

Planning Report and Statement of Consistency with Planning Policy

In respect of

Proposed Mixed Use Development at

**BELGARD SQUARE EAST,
TALLAGHT, DUBLIN 24**

Prepared for

Ravensbrook Ltd

Prepared by

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Executive Summary

The development will consist of the redevelopment of an existing brownfield site (c. 1.26ha) and the construction of a mixed-use development comprising 310 no. build to rent residential apartments including 99 no. one bedroom units, 203 no. 2 bedroom units and 8 no. 3 bedroom units, 2,289 sqm of commercial space is provided at the ground floor over 10 commercial units, including a creche, all within a part 6 to part 12 no. storey building over basement. 2,223 sqm of external amenity space provided in the form of a ground floor garden and external terraces at fifth, sixth, seventh and eighth floor levels, 1,026 sqm of public open space provided in the form of a central courtyard and landscaped areas adjacent to the perimeter of the site, 1,785 sqm of internal resident support facilities and amenity space provided at basement, ground and first floor levels.

Vehicular access to the basement will be from a new access point from Belgard Square East with a new tertiary route provided through the site linking Belgard Road and Belgard Square East. Provision of 130 no. car parking spaces (7 no. disabled access spaces, 8 no. car club spaces) at basement level in addition to 5 set down spaces and 1 no. disabled access space at ground level, 6 no. motorcycle spaces and 763 no. bicycle parking spaces, site wide landscaping and all associated services and infrastructure required to facilitate the development.

The proposed development has been subject to formal pre-application consultation with the Planning Authority and An Bord Pleanála under the provisions of the Planning & Development (Housing) and Residential Tenancies Act 2016 and the submitted proposals have taken account of the feedback and opinions of both ABP and SDCC. The following changes are noted to the scheme submitted at pre-application consultation stage:

- Reduction in unit numbers from 326 to 310 no. units and development density from 362 units per hectare to 342 uph
- Introduction of 3-bedroom apartments at Block B
- Increase in commercial (retail, office and restaurant) floor space at ground floor level from 1,702 sqm to 2,289 sqm, or 34% increase, all with active street frontage
- Relocation of some internal amenity space to first floor level in Blocks A and B
- Improved external landscaping strategy and amended development boundary extended to include landscaped open space designed to taking in charge standards to enhance public realm and streetscape
- Reconsidered material finishes and balcony positioning and increased greening at roof terraces
- Revised and reconfigured external amenity space with roof terrace at tenth storey level omitted
- Tertiary route layout and landscaping refined and agreed in principle with South Dublin County Council
- Reduction in car parking provision from 149 to 130 (preferred Planning Authority provision) at basement level and rationalised crèche car parking and set down area
- Increase in bicycle parking provision from 631 to 763 spaces including cargo bike parking

The subject site is currently vacant in combination of hard standing and scrub located to the south of Blessington Road, west of Belgard Road and east of Belgard Square East, Tallaght. A McDonald's restaurant is located on the lands to the south. The site perimeter is defined by a boundary wall, with access from Belgard Square East taken from the west side of the site.

The site is located within a wider area comprising a large range of uses including commercial, residential, civic and educational. The site is currently surrounded by commercial buildings and associated surface car parking to the west, residential and retail to the east and restaurant use to the south.

The site is strategically located within the designated Tallaght Town Centre (to the west) and within close proximity to a third level institution, Technological University Dublin (TUD) - Tallaght Campus (to the north-east) and Tallaght University Hospital (to the north-west).

The site is located within 340m of Technical University of Dublin Tallaght Campus to the northeast and c. 380m from the Tallaght Centre Luas stop. The no. 27, 54A, 65, 75, 75A, 77A and 175 bus routes serve the Blessington Road located 75 metres east of the site, with route no. 76 serving Belgard Road c. 100 metres north of the site. A designated cycle lane exists on Belgard Road to the east. The proposed

Bus Connects Route 9 would also directly connect the site to Dublin city centre from a stop on Belgard Square North, approximately 150m north of the site.

National and Regional Policy

The proposed development accords with the National Planning Framework (2018) (NPF), in particular with the principles of compact growth and the reinforcement of the country's existing urban structure. Where housing policy is concerned, the proposed development accords with the NPF's core principles for housing delivery – in particular that the location of new housing be prioritised in existing settlements – and its objectives for the provision of homes at sustainable locations and increased residential density within settlements. A presumption in favour of the proposed development is considered to apply in accordance with NPF National Policy Objective 11.

The National Planning Framework recognises that *“currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040. Yet, the stock of housing in Ireland is largely comprised of detached and semi-detached houses with three to four bedrooms.”*

Having regard to the above, the proposed development responds to the identified strategic need for a greater mix in the housing stock in urban areas and in particular apartments, which will complement the wider housing stock in the area within an urban setting that facilitates higher density development alongside local employment.

The proposal will deliver much needed housing within the Metropolitan Area of the Greater Dublin Area in accordance with the aims of Housing for All – A New Housing Plan for Ireland 2021 which seeks to deliver an average of 33,000 homes per annum to 2030. In particular, the proposal will support pathway No. 2 which seeks to increase social housing delivery and pathway No. 4 which seeks to increase new housing supply.

The proposal is in compliance with Specific Planning Policy Requirement 4 of the Urban Development and Building Height Guidelines (December 2018) which requires that developments meet the provisions of Sustainable Residential Development in Urban Areas Guidelines (2009) in respect of density and provides an appropriate range of building heights relative to the area. The proposal, located within an urban centre, provides an appropriate density in compliance with the Sustainable Residential Development in Urban Areas (2009) at 342 units per hectare.

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines 2020 (the Apartment Guidelines) recognise the unique requirements of build-to-rent developments which do not require the same unit mix and car parking provision in order to provide an attractive and functional development. This is provided for by the inclusion of residential support facilities and amenities which are not a requirement within a 'build to sell' development, whilst also providing public and communal open space. The Apartment Guidelines state that in the context of sustainably increasing housing supply, targeting a greater proportion of urban housing development and matching to the type of housing required, there is a need for greater flexibility, removing restrictions that result in different approaches to apartment mix on the one hand, and to other forms of residential accommodation on the other.

The proposed development accords with the Guidelines for Planning Authorities on Sustainable Residential Development (SRD) in Urban Areas (2009) located on a brownfield, infill site (c. 1.26 hectares), adjacent to various bus routes and within 150 metres of a stop on the proposed Bus Connects Route 9, connecting to the site to the city centre. The site also benefits from an established cycle route on Belgard Road and is within 380m of the Tallaght Centre Luas Stop.

The proposed development conforms to the detailed guidance within the SRD Guidelines on layout, design and density – by making effective use of the site, making a positive contribution to its surroundings, having a sense of identity and place, providing for effective connectivity and featuring a design which is guided by the best principles of passive surveillance. The proposed development successfully addresses the 12 criteria for sustainable residential development contained within the Urban Design Manual (2009), a companion document to the SRD Guidelines.

The proposed development will make efficient use of land, be of high-quality design and the proposed apartments, internal resident support facilities and amenities and associated communal open spaces conform to and exceed the standards in the Apartment Guidelines (2020).

Local Planning Policy

South Dublin County Development Plan 2016-2022 and Tallaght Town Centre LAP 2020

The proposed development accords with the over-arching policies of the County Plan and LAP relevant development management policies, including with respect to residential development, regeneration green infrastructure, retail, open space and social infrastructure. The proposal includes a departure from the height and density standards for the site. A Statement of Material Contravention accompanies this SHD application in this regard.

Draft South Dublin County Development Plan 2022-2028

The draft South Dublin County Development Plan 2022-2028 is expected to be adopted in June 2022 and come into effect in August 2022 and will therefore be the Plan in force at the time of the decision of this application. The draft Plan has been carefully considered in the design development of the proposed development and consistency with this is demonstrated within this document.

Conclusions

The proposed development is considered to be consistent with the proper planning and sustainable development of the area, Section 28 Guidelines and the local planning policy framework; a presumption in favour of the proposed development, which will regenerate a vacant, brownfield site, is considered to apply, and it is therefore respectfully submitted that the proposed development should be approved by An Bord Pleanála.

1.0 INTRODUCTION

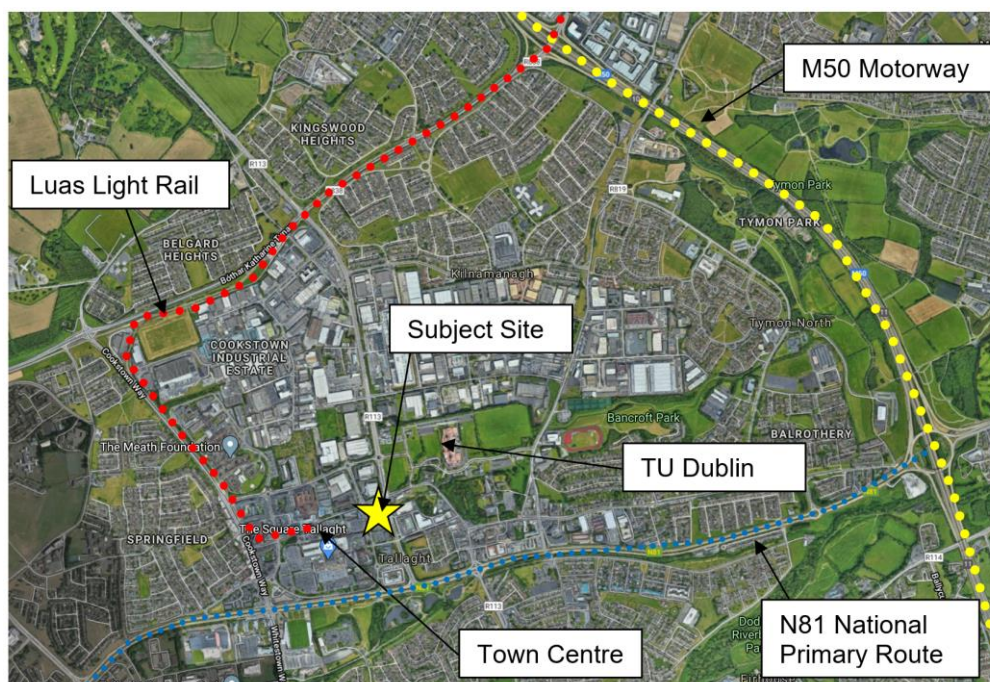
- 1.1 On behalf of the applicant, Ravensbrook Ltd, this Planning Report and Statement of Consistency with Planning Policy has been prepared to accompany a Strategic Housing Development application to An Bord Pleanála in relation to a mixed-use development including build-to-rent residential accommodation and commercial uses at a c. 1.26ha vacant brownfield site Belgard Square East, Belgard Road and Blessington Road, Tallaght, Dublin 24.
- 1.2 In summary, the development will consist of the demolition of existing boundary wall and the construction of a mixed-use development comprising:
- c. 2,289 sqm of retail/commercial floor space across 10 no. units including retail, restaurant/café and Class 2 financial/professional services and office use, and a crèche (257sqm) at ground and first floor levels;
 - 310 no. build to rent residential apartments including 99 no. one bedroom units, 203 no. 2 bedroom units and 8 no. three bedroom units within a part 6 to part 12 no. storey development across 3 blocks over partial basement;
 - c. 2,223 sqm of communal external amenity space provided in the form of a ground floor garden and external terraces at fifth, sixth, seventh and eighth floor levels; c. 1,026 sqm of public open space provided in the form of a central courtyard with landscaped areas at site perimeters;
 - c. 1,785 sqm of resident support facilities and services and amenities provided at basement, ground and first floor levels;
 - Vehicular access to the basement development from a new access point at Belgard Square East;
 - A new tertiary route will be provided in the southern part of the site linking Belgard Square East and Belgard Road;
 - Provision of 130 no. car parking spaces (including 8 no. club car spaces and 6 no. disabled access spaces) at basement level in addition to 5 no. set down spaces (4 no. serving creche) and 1 no. disabled access space at ground level, layby on Belgard Square East, 6 no. motorcycle spaces and a total of 763 no. bicycle parking spaces;
 - Provision of 4 no. Ø0.3m microwave link dishes to be mounted on 2 no. steel support pole affixed to lift shaft overrun, all enclosed in radio friendly GRP shrouds, together with associated equipment at roof level at Block B;
 - Provision of 3 no. ESB substations with switch rooms and plant rooms at basement level, hard and soft landscaped areas, bin and bicycle stores, public lighting, attenuation, green roof, plant at roof level, service connections and all ancillary site development works.
- 1.3 This report, prepared by John Spain Associates, demonstrates that the proposal is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy. It should be read in conjunction with the accompanying detailed documentation prepared by Henry J Lyons Architects, Parkhood Landscape Architects and CS Consulting Engineers, as well as other supporting documentation provided with the application.
- 1.4 For details of consistency with the quantitative standards for residential units as outlined in the Apartment Guidelines 2020, the Quality Housing for Sustainable Communities, the South Dublin County Development Plan 2016-2022 and the Draft South Dublin County Development Plan 2022-2028 please refer to the Housing Quality Assessment and Schedules Document prepared by Henry J Lyons Architects.

2.0 SITE AND DEVELOPMENT DESCRIPTION

Site Description

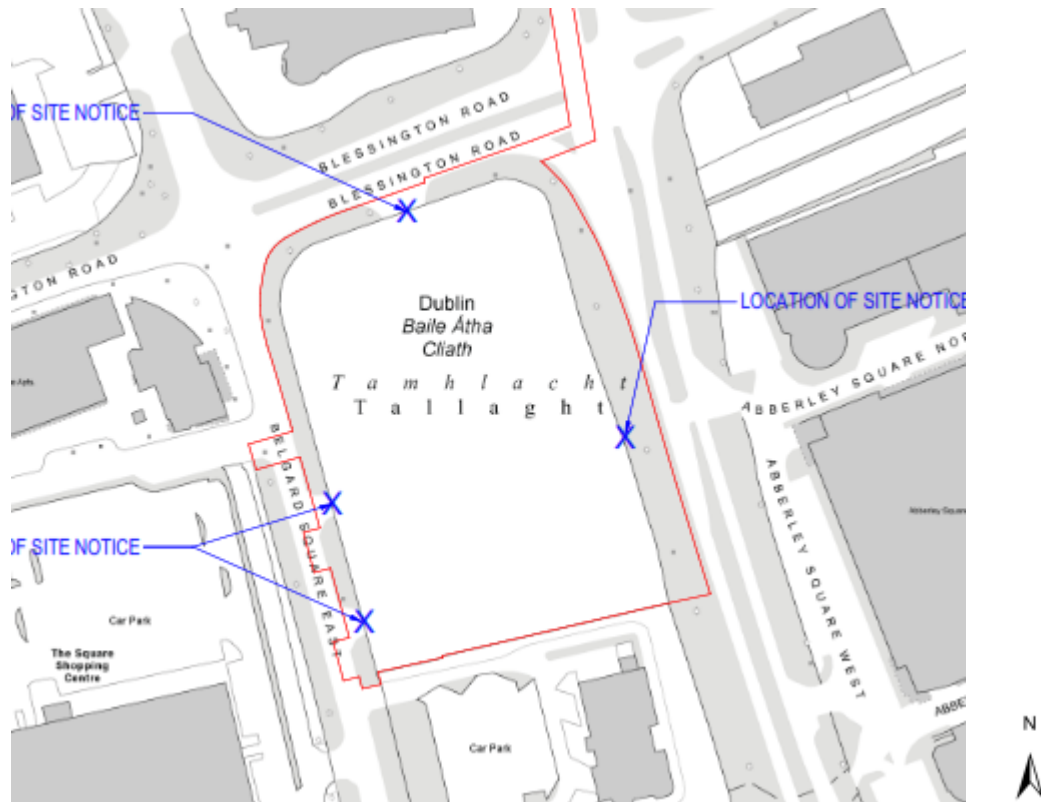
- 2.1 The subject site is currently vacant and exists as a combination of hard standing and scrub, enclosed by a boundary wall, with access taken from Belgard Square East on the western side of the site. The site extends to c. 1.26ha and is bound by Blessington Road to the north, Belgard Road to the east and Belgard Square East to the west. An existing McDonald's restaurant borders the site to the south.
- 2.2 The site is located within a wider area comprising a large range of uses including commercial, residential, civic and educational. The site is currently surrounded by commercial buildings and associated surface car parking to the west, residential and retail to the east and restaurant use to the south. The site is located within the designated Tallaght Town Centre (to the west) and within close proximity to a third level institution, Technological University Dublin (TUD) - Tallaght Campus (to the north-east) and Tallaght University Hospital (to the north-west).
- 2.3 The site is located within the wider town centre of Tallaght, which extends to the west of the site around the Luas stop and Tallaght hospital. The wider area is undergoing an evolution comprising residential-led development in close proximity to high quality public transport links, employment opportunities and third level institutions as well as a range of services and facilities.
- 2.4 The site is located within 342m of TU Dublin Tallaght Campus to the northeast and c. 380m from the Tallaght Centre Luas stop. The no. 27, 54A, 65, 75, 75A, 77A and 175 bus routes serves the Blessington Road located 75 metres east of the site, with route no. 76 serving Belgard Road c. 100 metres north of the site. A designated cycle lane is also provided on Belgard Road to the east. Bus Connects Route 9 would also directly connect the site to the city centre from a stop on Belgard Square North, approximately 150m north of the site.

Figure 1 – Site Location in context of surrounding area



Source: Google Maps

Figure 2 – Subject site



Source: HJLA

Figure 3 – Proposed site layout plan



Source: HJL

Description of Proposed Development

- 2.5 The Site Layout Plan (Figure 3) prepared by Henry J Lyons Architects shows the overall layout in context.
- 2.6 In summary, the proposed development will comprise of the construction of a mixed-use development including 310 no. build to rent residential units and commercial units as well as a c. 257 sqm crèche (including internal parking and set down) on a net site of c. 0.9 hectares. The proposal will provide a high level of internal residential amenity in combination with landscaped external communal and public open spaces and roof terraces. The development is divided into three blocks, Block A forming the western part of the main 'U' shaped building fronting Belgard Square East and extending midway along the Blessington Road frontage to meet Block B which completes this elevation and branches south along Belgard Road. Block C extends the length of the southern perimeter on the east-west axis.
- 2.7 The proposed development focuses on high quality landscaped external amenity at ground floor and upper floor levels through a combination of external terraces and a central courtyard located between the buildings, with building heights increasing from 6-8 storeys at Block C at the southern perimeter to 7, 10 and 11 storeys set back from the western perimeter at Belgard Square East at the northwest corner (Block A) and to 10 and 12 storeys at the northeast corner fronting to Blessington Road at Block B, which benefits from a separation distance of over 55 metres to the nearest building to the north. This also provides an appropriately scaled element of height at the corner of the block and graduates from the 6 and 7 storey buildings to the west at Belgard Square East and to the east at the mixed-use development at Belgard Road.
- 2.8 The proposed tertiary route through the site will facilitate and promote walking and cycling links, restricted to emergency vehicle and service/taxi access only with set down bays provided. This will enhance permeability through the site and encourage the use of the established cycle lanes on Belgard Road to the east. A 'town link' route is provided through the central courtyard and links to Blessington Road at the northern perimeter for exclusive use of pedestrians and cyclists.
- 2.9 The proposal includes significant improvements to the public realm at site edges to Blessington Road, Belgard Road and Belgard Square East, introducing high quality landscaped buffers at these locations, enhancing the pedestrian network around the site and making provision for future cycle lanes in accordance with the objectives of the Tallaght TC LAP. Tree planting, raised beds and bicycle parking provide a high quality appearance to the development, attracting footfall and permeability through the site via the tertiary route and the 'town link', with landscaping provision enhanced following pre-application consultation with the Planning Authority and An Bord Pleanála.
- 2.10 Landscaping, roads and drainage works proposed outside the applicant's ownership boundary have been subject to discussion with South Dublin County Council, with agreement in principle established for the works. A letter of consent from the Planning Authority accompanies this application in respect of these areas.
- 2.11 A total of 130 car parking spaces are provided at basement level including 8 club car spaces, with 7 no. disabled access spaces and 4 no. creche drop off spaces. In addition, a total of 763 bicycle parking spaces are provided including 214 visitor park spaces, 20 staff spaces with 6 motorcycle spaces and 8 cargo bike spaces. A total of 27 spaces are fitted with EV charging points.

- 2.12 A summary of the key elements of the proposed scheme are set out below for ease of reference.

Parameter	Proposal
Site Area	0.91 ha net / 1.26 ha gross
No. of BTR Apartments	310 units
Density (net)	342 per ha.
Plot Ratio	3.4
Site Coverage	49%
Dual Aspect	48%
Other Uses	Retail/Commercial: 2,289 sqm <ul style="list-style-type: none"> - Retail/Restaurant (609 sqm) - Creche (257 sqm) - Retail/Class 2 / Professional Services/Office (586 sqm) - Retail (467 sqm) - Retail/Café (252 sqm) - Ancillary (119 sqm)
Residential Facilities & Amenities	1,785 sqm
Communal Open Space	2,223 sqm
Public Open Space	1,026 sqm
Car Parking	130 spaces + 5 set down spaces
Bicycle Parking	763 spaces
Part V	31 units

Residential

Unit Mix

- 2.13 The proposed development will comprise the following unit mix:

Table 2.1 – Overall Dwelling Mix

	1 bedroom	2 bedroom	3 bedroom	Overall
Apartments	99	203	8	310
Overall Mix	32%	65%	3%	100%

Source: Henry J Lyons Architects Schedule of Areas

- 2.14 As above, a mix of one, two and three bedroom units will be provided throughout the development. The proposed mix is considered to respond appropriately to current residential need in Tallaght and the wider trend of decreasing household sizes. The proposed development will provide high quality residential accommodation in a range of apartment types that meet and exceed the minimum area standards as set out at Appendix 1 of the Apartment Guidelines 2020. Refer to the accompanying Housing Quality Assessment prepared by HJL Architects for further details.

Amenity

- 2.15 The proposed development will include internal amenity spaces (998 sqm) in the form of a residents' gym, lounge and yoga deck at ground floor level of Block C, complemented by 2 no. additional coworking spaces looking onto the courtyard at Block A and residents lounge and games room/amenity space at ground floor level of Block B looking onto the courtyard. At first floor level at Block B, a residents' gym, lounge and games room are provided, complementing provision at ground floor level. This is in addition to 787 sqm of reception and management office, shared support facilities comprising secured and covered bicycle parking at basement and surface level, maintenance stores, secure storage and refuse storage areas, parcel locker and letter boxes (at each block) providing a total of 1,785 sqm of resident support facilities and amenities, equating to c. 3.4 sqm per bedroom. Internal amenity and support facilities are distributed across each of the blocks commensurate with the quantum of residential units within each.
- 2.16 The suitability of the proposed amenity for the intended rental market is set out within the accompanying Operational Management Plan prepared by Hooke & MacDonald. It is considered that the coworking elements of the proposed amenity within the development will complement the working from home trend which has been accelerated by the Covid-19 pandemic and is expected to form an important part of a hybrid model of working in future. The quantum of coworking space within the development will provide residents with an alternative to working within their apartment and offer a pleasant working environment overlooking the central area of public open space. Gym space, lounge, games room as well as a yoga deck adjacent to the south-facing residents' garden at the southern elevation of Block C encourages an active lifestyle for residents. Residential amenity is consolidated by the various commercial uses such as café, restaurant and creche facilities which contribute to a high-quality residential environment which complements the existing retail provision nearby.
- 2.17 Communal external amenity space (2,223 sqm) is provided throughout the site in the form of useable ground level landscaped spaces in the form of a residents' garden at ground level along the southern boundary of the site, benefiting from a southerly aspect complemented by external roof terraces at fifth, sixth, seventh and eighth floor. These areas provide a high-quality landscaped environment and include a range of passive and active recreation whilst receiving high levels of sunlight access throughout the year. Please refer to the accompanying landscape documents prepared by Parkhood for more details.
- 2.18 All apartments benefit from private amenity in the form of external balconies. Please refer to accompanying Housing Quality Assessment prepared by HJL Architects for confirmation of compliance with relevant amenity standards as set out at Appendix 1 of the Apartment Guidelines.

Commercial

- 2.19 The proposal includes 10 no. commercial units at ground and first floor levels providing active frontage at street level throughout the site. The provision of commercial units has been increased significantly to that proposed at pre-application stage, with an additional 5 no. commercial units now proposed, increasing commercial floor space to c. 2,289 sqm from c. 1,702 sqm at pre-application stage. This represents a c. 34% increase in commercial floor space in the development now submitted in response to pre-application engagement with South Dublin County Council and An Bord Pleanála and represents c. 7% of the overall gross floor area. The majority of proposed units front Belgard Square East, Blessington Road and Belgard Road, with a single retail

unit C1 providing active frontage to the tertiary route which bisects the southern part of the development.

- 2.20 The commercial units provide a variety of retail-based uses including 2 no. restaurant units, 1 no. café unit, 4 no. retail, 2 no. financial/professional services/offices and 1 no. creche providing c. 2,289 sqm of commercial floor space as follows:

Table 2.2 – Commercial Provision

Unit	Commercial Use	Floor Space (sqm)
A1	Retail/ Restaurant	284
A2	Retail/ Restaurant	325
A3	Retail/Financial Services/Office	233
B1	Retail	145
B2	Retail/Estate Agent / Retail (ground floor)	226
B2.1	Office / Retail (first floor)	127
B3	Retail	109
B4	Retail/Café	252
C1	Retail	114
C2	Retail	98
C3	Crèche	257
	Ancillary Commercial Bin & Bike Stores	119
	Total	2,289

Source: Henry J Lyons Architects Schedule of Areas

- 2.21 The total provision consists of 2,289 sqm of commercial use, equating to 7% of the overall gross floor area. This is consistent with the Planning & Development (Housing) and Residential Tenancies Act 2016 which sets out a limit of 15% of 'other uses'. This ensures the proposed development is including the maximum quantum of commercial uses as possible under the SHD regulations and provides an appropriate mix of uses at the site.
- 2.22 A range of unit sizes are proposed to accommodate different uses to meet the needs of various commercial types. The proposed commercial provision has been informed by market analysis and research undertaken by Bannon Property Consultants, in respect of existing and anticipated demand in the area, with units sized accordingly. Please refer to this report at Appendix 2. Bin stores are provided at Blocks A and B, making provision for all commercial units at an accessible location. A total of 20 no. secure staff bicycle parking spaces are provided at basement level, with additional bicycle parking at ground level adjacent to commercial units. Secure staff bicycle parking is accessed conveniently from the tertiary link road through the site, with bicycle friendly stairs descending to a store at basement level.
- 2.23 This is in addition to a c. 257 sqm crèche adjacent to the south of the vehicular access from Belgard Square East at Block C, with a designated set down / drop off area with 4 car parking spaces and cargo bike parking at ground level serving the creche. This segregated access area will minimise vehicular use of the tertiary route through the site with 1 no. accessible space and set down space parallel to Block C on the southern side of the tertiary route. The crèche includes a 154 sqm external space to the rear

adjacent to the southern perimeter, benefiting from good access to sunlight at this location.

- 2.24 Visitor bicycle parking spaces are provided adjacent to the external façades of commercial units, as well as located within and around the edge of the internal courtyard. Visitor bicycle parking has increased to provide 214 spaces at surface level, complemented by secure staff bicycle parking at basement level. External restaurant and café seating areas are included adjacent to unit A1 and B4 fronting Belgard Square East (Block A) and Belgard Road (Block B) respectively. The remaining commercial units (with the exception of C2) occupy locations fronting the public streets at Belgard Road, Blessington Road and Belgard Square East, with additional commercial units having replaced residential amenity at these locations. The commercial provision included will optimise the ground floor aspects and ensure active frontage and passive surveillance to the streetscape, as well as contributing to the night-time economy, inviting footfall and creating an active urban environment. Double height commercial elevations are proposed at Block B to further animate and contribute positively to the public realm in combination with landscaped edges of the site.

Figure 4 - Proposed Active Frontage to Blessington Road



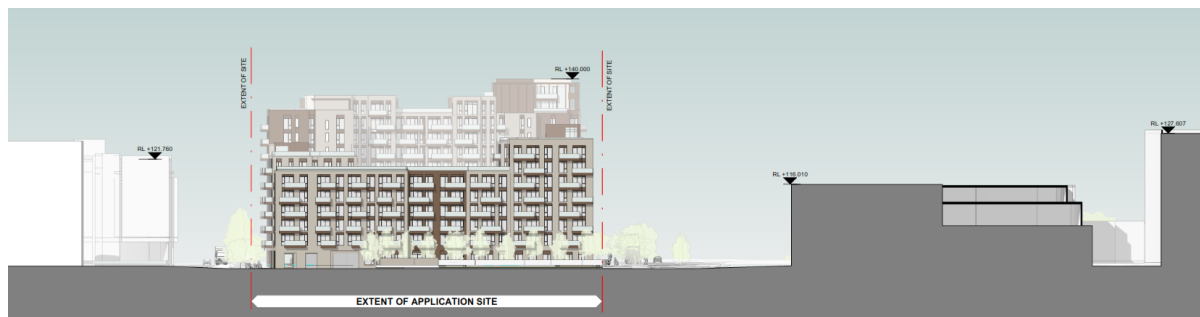
Source: HJL

Built Form and Design

- 2.25 The proposed building design has been carefully modulated to respect the adjoining sites and any future development which may occur. Building height has been designed to step up from proposed 6 and 8 storeys at Block C along the southern boundary, graduating to 7, 10 and 11 storeys at Block A and 10 and 12 pop up and setback storeys at Block B at the northern elevation to Blessington Road. Building heights have been designed to integrate and relate to the adjacent developments extending to 6 and 7 storeys to the east at Belgard Road and up to 7 storeys at Thunsgate apartments neighbouring to the west at Belgard Square East. Heights step down to the internal public open space at the centre of the site, contributing to the creation of a sense of place and enclosure at this location without any overbearing factor, with the lesser heights at Block C ensuring the central courtyard and roof terraces receive good levels of sunlight throughout the year, adding positively to the scheme and the usability of this public open space.
- 2.26 The appearance of the proposed development in the context of adjacent existing building heights is shown below. Please refer to the accompanying architectural

drawings and design statement prepared by HJL and the Design, Townscape and Visual Impact Assessment prepared by City Designer (informed by Photomontages prepared by Visual Lab) for further details.

Figure 5 – Building Height Context (Southern Elevation)



Source: HJL

- 2.27 The proposed graduation in building height has been informed by the principles of the Tallaght Local Area Plan which promotes increased heights moving north through the site, with a strong urban grain at the northern elevation at Blessington Road, complemented by the commercial uses and double height frontages at ground floor level at this location. Building heights proposed are considered appropriate having regard to the site's separation distances from neighbouring buildings to the west (in excess of 20 metres and 40 metres), to the north (in excess of 55 metres) and to the east across Belgard Road (approximately 50 metres). The proposed predominantly 6 storey Block C is c. 17 metres north of the gable of the adjacent single storey restaurant to the south, with a significant landscape buffer at this location including a residents' garden. The setbacks of the proposed development from site boundaries serves to respect the existing separation distances and enhance these in order to preserve amenity. The proposed development height and density is considered appropriate having regard to the site's location in close proximity to high frequency public transport, employment and educational facilities and recreation. This is further addressed within the accompanying Design Townscape Visual Assessment (DTVA) prepared by City Designer.
- 2.28 The proposed range of building heights provide for the inclusion of various external roof terraces across the scheme which will benefit from excellent levels of sunlight throughout the year. Roof terraces at fifth, sixth, seventh and eighth storey levels across Block A, B and C respectively, contribute positively to the range and quality of communal residential amenity within the scheme and include a mix of recreational activities and planting. This is detailed further within the accompanying landscaping drawings and report prepared by Parkhood which have been refined and enhanced following pre-application stage. The remainder of the roof areas will be occupied by green roofs, boosting biodiversity at the site and contributing to the creation of habitats superior to the current use on site, with the majority of plant located at basement level.
- 2.29 The proposed materials and finishes include selected white and buff brick, elements of selected stone at ground floor levels and metal cladding which are durable materials and will weather well. Double glazing windows and doors are provided to apartments, with selected bronze spandrel panels and low iron frameless cantilevered glass balustrades providing a high-quality modern finish to the building. Glazing with metal frames provides the predominant material finishes at upper floors of Blocks A and B at the northern elevation, presenting a high-quality fenestration and quiet visual appearance at this level, set back from the building lines. Balustrades have been increased in height to provide a useable environment for residents. Glazing is used

extensively at ground floor levels at commercial units and residential amenity areas providing active frontage to the public realm at these locations and attracting footfall. Please refer to Section 5 of the HJL Design Statement for greater details on materials and finishes proposed.

Car Parking and Cycle Parking Provision

- 2.30 The scheme will provide a sustainable quantum of car and bicycle parking across the site considered appropriate in the context of the site's location and proximity to public transport links.
- 2.31 It is proposed to provide a total of 130 no. car parking spaces within the development, assigned to the residential aspect of the development and shall be located at basement level. 4 no. spaces are provided within a set down area serving the proposed crèche at ground floor level of Block C and accessed via the tertiary route branching east from Belgard Square East. This gives the residential aspect of the development a parking ratio of 0.42 spaces per unit. A total of 8 club car sharing spaces will be reserved for an operator such as Go Car or Yuko. 7 no. disabled access spaces are provided, alongside 27 no. EV charging spaces and 2 no. layby/set down spaces at Belgard Square East and parallel to the tertiary route. Please refer to the accompanying Traffic & Transport Assessment prepared by CS Consulting for further details. The proposed car parking provision responds to the advice and comment of the Planning Authority at pre-application stage and is considered to be appropriate in the context of the proper planning and sustainable development perspective having regard to the site's highly accessible location proximate to high frequency and high-capacity public transport links, surrounding services and facilities and employment opportunities.
- 2.32 As previously described, the development site is located within 5 minutes' walk of the Tallaght Centre Luas stop, which benefits from a high frequency 3-4 minute service to Dublin city centre and other Luas connections. Bus stops on Blessington Road are located approximately 75 metres east and are served by the nos. 27 (high quality bus route with 10 minute peak frequency), 54A (30 min frequency), 65 (60 min frequency), 75 (30 min frequency), 75A (25 min frequency), 77A (20 min frequency) and 175 (15 min frequency) bus routes, with route no. 76 (20 min frequency) serving Belgard Road c. 100 metres north of the site. A designated cycle lane is also provided on Belgard Road to the east. Proposed Bus Connects Route 9 will also connect the site to the city centre from a stop on Belgard Square North, approximately 150m north of the site.
- 2.33 The proposed development provides a total of 763 bicycle parking spaces on site, increased from 631 at pre-application stage. This includes 214 visitor parking spaces and 8 cargo bike spaces located at various locations throughout the site within public open space in the central courtyard and landscaped areas and adjacent to commercial units on primary elevations fronting Belgard Square East, Blessington Road and Belgard Road. The proposed cycle parking provision exceeds the South Dublin CDP standard as set out at Table 25 of the CS Consulting TTA below and contributes to the sustainable nature of the development which promotes multi-modal travel.

Table 25 – South Dublin Development Plan Cycle Parking Provision

Dwelling Type		Parking Standard	Quantum	Min. Parking Provision	Proposed Provision
Apartment	Short Stay	1 space per 10 units	310 units	31 spaces	159 spaces
	Long Stay	1 space per 5 units	310 units	62 spaces	529 spaces
Commercial (Retail Comparison)		1 space per 50m ² GFA	1939m ² GFA	39 spaces	55 spaces
Crèche		1 per 5 staff	21 staff	4 spaces	20 spaces
Total				136 spaces	763 spaces

- 2.34 A total of 529 secure residential bicycle parking spaces are provided, alongside 20 staff bike spaces at basement level. A total of 214 visitor parking spaces (50% covered) are provided at ground level, with 6 no. motorcycle spaces and 8 no. cargo bike spaces. The proposed development promotes the use of sustainable modes of travel and includes excellent provision for cyclists with a ‘town link’ included through the public open space in the centre of the site branching north from the tertiary route connecting Belgard Road and Belgard Square East. This provides access to the established cycle lane on Belgard Road and the proposed 9A Cycle Route on Blessington Road to the north.

Landscaping Strategy

- 2.19 The landscape design aims to create a sense of connectivity between spaces and promotes a sense of place and well-being within the mixed-use residential development. This will be achieved through the use of high-quality materials and the establishment of a carefully considered planting scheme. A coherent pedestrian footpath network ensures that residents and guests can navigate around the development easily. The use of urban furniture, nature play areas with trees, hedges and other planted areas, help to create areas of seclusion and privacy for the residents in the inner yard.
- 2.20 This is complemented by a residents’ garden along the southern perimeter of the site which includes a seating area, community garden and raised planters with boundary planting. A yoga deck forms an extension to the residents’ gym and lounge at this location, which benefits from an attractive southerly aspect.
- 2.21 The planting scheme uses a mix of native and ornamental tree and shrub species to create a seasonal landscape that is functional, whilst sympathetic to the surrounding environment. The design will create high quality public spaces including carefully designed public realm and a pedestrian connection through the site. The central courtyard park at ground floor and roof terrace gardens will ensure that residents on all levels readily have access to exterior garden spaces. The creche outdoor space is proposed to the south of the unit, benefiting from a southerly aspect and carefully sheltered from the view and noise of surrounding streets and adjacent properties with a planting buffer.

- 2.22 The design includes an open space for natural play, passive and active recreation thanks to flexible lawn area, but also social/communal interaction for a diverse type of user.
- 2.23 The landscaping strategy provides a high-quality quantum of communal open space equating to 2,223 sqm across ground floor level and various roof terraces at fifth, sixth, seventh and eighth storey levels, exceeding the requirements of the Apartment Guidelines in this respect.
- 2.24 In respect of public open space, the proposal includes a total of 1,026 sqm of landscaped open space at ground level focused on the central courtyard, equating to 11.3% of the net site area and exceeding the 10% requirement set out in the County Development Plan 2016 and draft CDP 2022. The draft Plan also sets out a requirement for 2.4 ha public open space per 1,000 population. This is addressed in the accompanying Statement of Material Contravention. The landscaping scheme introduces a wide variety of activities for residents and visitors and integrates with the existing public realm along the site edges, enhancing the visual appearance of the streetscape and vastly improving biodiversity on the site.
- 2.25 The public open space and the internal areas of the site have been enhanced with additional high-quality landscaping in response to pre-application consultation with the Planning Authority and An Bord Pleanála, with increased quantum of landscaping, planting and play areas within the courtyard and adjacent to the tertiary route which bisects the southern part of the site and includes a shared surface prioritising pedestrian and cycle movement. This is complemented by additional landscaping around the site edges, contributing to an enhanced public realm and quality streetscape and providing a good balance of hard and soft landscaping.
- 2.26 Please refer to the Landscape Design & Access Statement and accompanying drawings prepared by Parkhood for further details.

Drainage & Infrastructure

- 2.1 In terms of surface water drainage, a restricted discharge rate of 2.0 l/s will be provided by means of a flow control device. The attenuation tank for the development is designed to cater for the 1 in 100 year storm event including an additional 20% for climate change. It is proposed to discharge the storm water via a pumping station. SUDS proposals are integrated within the landscaping strategy and consist of green roofs, permeable paving, rain gardens and local tree pits for enhanced interception, designed in accordance with South Dublin County Council requirements.
- 2.2 It is proposed that all foul effluent from the proposed development from upper floors will be collected in separate foul pipes and flow under gravity, via the new 225mm sewer to the existing 225mm diameter foul sewer on Belgard Square East, located to the west of the site via a new connection. The outfall into the public system will be onto Belgard Square East and the last private manhole will be designed in accordance with Irish Water requirements. Please refer to CS Consulting Drawing Q003-CSC-ZZ-XX-DR-C-0002 for more details.
- 2.3 In respect of water supply, it is proposed to connect the development to the existing watermain on Belgard Road via a new 150mm ID pipe with bulk water meters to Irish Water specifications. The existing 6" CI main shall be replaced with a new 200mm ID pipe over a length of 165m along Belgard Road to the north of the development site. Please refer to CS Consulting Drawing Q003-CSC-ZZ-XX-DR-C-0003 for more details.

- 2.4 Irish Water have issued a Confirmation of Feasibility and Statement of Design Acceptance in respect of the proposed drainage and water supply strategies, which has been subject to pre-application engagement with Irish Water and South Dublin County Council who are agreeable in principle to the strategy. Both letters are enclosed with the accompanying CS Consulting Engineering Services Report.

3.0 PLANNING HISTORY

Subject Lands

SD04A/0975

- 3.1 South Dublin County Council issued a final grant of permission on 16th March 2006 for a mixed used development extending to 4-6 storeys in height (over basement) consisting of retail (c. 6,300 sqm), crèche, and a total of 223 no. residential apartments at upper floors, alongside a 200 space Luas park and ride located at basement level and residents parking. The permission was granted an extension in 2013 which expired on 16th March 2016. The permission was not implemented.

SD09A/0419

- 3.2 South Dublin County Council issued a final grant of permission on 1st April 2010 for a mixed used development extending to 5 storeys over basement car parking comprising of c. 6,339 sqm of retail and 297 sqm of café/restaurant uses at ground floor level, retail use of c. 6,856 sqm at first floor level, leisure/bowling use of 3,321 sqm and cinema of 2,736 sqm at second floor level and a 14 screen multiplex cinema of 6,154 sqm at third floor level with projector floor at fourth floor level, as well as a new landscaped public plaza at the corner of Belgard Square East and Blessington Road and a public link street linking Belgard Square East and Belgard Road and provision of 240 car parking spaces. The permission was granted an extension in 2015 which expired on 1st April 2020. The permission was not implemented.

Surrounding Area

ABP-309916-21

- 3.3 On 21st September 2021, An Bord Pleanála issued a grant of permission for development comprising the demolition of the existing buildings, construction of 170 no. Build to Rent apartments, creche and associated site works on a site at Glen Abbey, Belgard Road, Cookstown Industrial Estate, Dublin 24, approximately 750 metres north of the subject site. The proposal extended to 4-7 storeys over basement and a net density of 256 units per hectare.
- 3.4 The proposal was a material contravention of the Tallaght Local Area Plan in terms of height, density and plot ratio. In granting permission, the Board had regard to: the provision of Project Ireland 2040 National Planning Framework with regard to compact growth and the provision of new homes within existing settlements, the Dublin Metropolitan Area Strategic Plan, the provision of the Urban Development & Height Guidelines and the Sustainable Urban Housing: Design Standards for New Apartments Guidelines 2020, the pattern of existing and permitted development in the area and the planning history of the wider area.

ABP-303306-18

- 3.5 In April 2019, An Bord Pleanála granted permission for a Strategic Housing Development (SHD) within 600m of the subject site, at the junction of Belgard Road and Belgard Square North, Tallaght, Dublin 24 as summarised below:
- 3.6 The proposed development will consist of a mixed-use residential development (total gross floor area, 180 square metres) 438 no. apartments and 403 no. student bedspaces and amenity and staff facilities, crèche, 6 retail/commercial units, parking, public plaza and associated site works:
- Block A1 will be four to seven storeys in height comprising 34 number one bed units, 41 number two-bed units and 13 number three-bed units with residents' amenities (circa 298 square metres) on the ground floor.
 - Block A2 will be four to seven storeys in height comprising 27 number one bed units, 77 number two-bed units and 15 number three-bed units with residents' amenities (circa 307 square metres) on the ground floor.
 - Block A3 will be four to ten storeys in height comprising 51 number one bed units, 58 number two-bed units and seven number three-bed units with residents' amenities (circa 127 square metres) on the ground floor.
 - Block B1 will be four to eight storeys in height comprising 39 number one bed units, 53 number two-bed units and 15 number three-bed units with one number two-bed live/work unit and seven number one-bed live/work units.
- 3.7 The permitted development consisted of a density of 146 units per hectare and extended to building heights of 4-10 storeys.

ABP-303803-19

- 3.7 In July 2019, an SHD application was granted by An Bord Pleanála on a site on Second Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24, c. 1km northwest from the subject site.
- 3.8 The development will consist of demolition of the existing 2,590 square metres industrial building and the construction of a 'build-to-rent' housing development providing a total of 196 number residential apartments in four number six to nine storey blocks over basement. The development will include one number commercial unit (248 square metres, accommodating Class 1, 2 and 8 uses as per the Planning and Development etc.
- 3.9 The proposal was subject to an Oral Hearing on the 9/07/2019. The main concern which was discussed at the Oral Hearing was in relation to proposal potential impact on aviation safety. The development consisted of a net density of 329 units per hectare and extended to building heights of 6-9 storeys.

ABP-305763-19

- 3.10 Permission was granted by An Bord Pleanála through the SHD planning process on 20th February 2020 for development at a site at the corner of Airton Road and Belgard Road, Tallaght, Dublin 24, c. 400m north of the subject site. This permission involved the demolition of an existing industrial building and construction of 328 apartments in 2 blocks.
- 3.11 The permitted development consisted of a development density of 276 units per hectare and a maximum height of 9 storeys.

ABP-306705-20

- 3.12 The former Gallaher's Cigarette Factory site is located 850m northeast from the subject site, at the junction of Airton Road and Greenhills Road, Tallaght, Dublin 24. On 16th of June of 2020 permission was granted via the SHD process for the demolition of the existing factory and construction of 502 apartments.
- 3.13 The development applied for consisted of the following:
- Demolition of existing factory/warehouse buildings on site (total floor area circa 10,076.8 square metres).
 - Construction of 502 number apartments (comprising 197 number one-bed; 257 number two-bed; and 48 number three-bed units) within six number blocks ranging in height from four to eight storeys. All residential units provided with associated private balconies/terraces to the north/south/east/west elevations.
 - Provision of residential amenity facilities, three number retail units, creche, and services/bin store areas (total non-residential floor area circa 1,839 square metres).
- 3.14 The permitted development comprised of building heights of 4-8 storeys and a density of 202 units per hectare.

ABP-308398-20

- 3.15 An Bord Pleanála granted permission for the demolition of existing industrial buildings and the construction of 252 no. build to rent apartments with private open space, communal amenity space, a gym and all associated site works on 28th January 2021 on a site at Units 66 and 67 Fourth Avenue, Cooksotwn Industrial Estate, Tallaght, Co. Dublin. The site is c. 900 metres / 11 minutes walking distance from the subject site.
- 3.16 The permitted density was 292 unit per hectare and building heights of up to 9 storeys.

4.0 NATIONAL AND REGIONAL PLANNING POLICY

- 4.1 The key provisions of national and regional planning policy as it relates to the proposed development are as follows:
- National Planning Framework (2018);
 - Housing for All – A New Housing Plan for Ireland 2021;
 - Regional Spatial and Economic Strategy - Eastern and Midlands Regional Assembly 2019-2031.

National Planning Framework

- 4.2 The National Planning Framework is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.
- 4.3 As a strategic development framework, '*Project Ireland 2040*' sets the long-term context for our country's physical development and associated progress in economic, social and environmental terms and in an island, European and global context.

National Strategic Outcomes

- 4.4 The NPF states that carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. Section 2.6 of the NPF seeks to provide compact and sustainable growth.
- 4.5 Chapter 4 of the National Planning Framework seeks to make urban places stronger *“to enhance people’s experience of living and working in and visiting urban places in Ireland.”*
- 4.6 The following is outlined:
- National Policy Objective 3a of the NPF states that it is a national policy objective to *“deliver at least 40% of all new homes nationally within the built up envelope of existing urban settlements”*.
- 4.7 National Policy Objective 3b seeks to:
- “Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints”*.
- 4.8 National Policy Objective 4 states *‘ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being’*.
- 4.9 National Policy Objective 5 seeks to: *“Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity”*.
- 4.10 National Policy Objective 13 states:
- “In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.”*
- 4.11 National Policy Objective 31 seeks to:
- “Prioritise the alignment of targeted and planned population and employment growth with investment in:...*
- The provision of childcare facilities and new and refurbished schools on well located sites within or close to existing built-up areas, that meet the diverse needs of local populations;”...*
- 4.12 National Policy Objective 32 seeks to *“target the delivery of 550,000 additional households to 2040”*.
- 4.13 National Policy Objective 33 - *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

- 4.14 National Policy Objective 34 - *Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.*
- 4.15 National Policy Objective 35 - *Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

Evaluation of Consistency

- 4.16 The proposed development accords with the National Planning Framework (2018) (NPF), in particular with its principles of compact growth and the reinforcement of the country's existing urban structure at all levels. Where housing policy is concerned, the proposed development accords with the NPF's core principles for housing delivery – specifically that the location of new housing be prioritised in existing settlements on an infill site. The proposed development is aligned with NPO5 which seeks proposals of scale to make Dublin an internationally competitive city and is of appropriate height to provide a well-designed urban grain and contribute positively to the living environment and streetscape.
- 4.17 In accordance with the NPF's strategy of compact growth, it is proposed to develop new homes at an underutilised, brownfield infill site.
- 4.18 In accordance with the above referenced policy objectives, new homes will be provided at a sustainable location, with access to existing services and facilities close by such as Tallaght Town Centre. The site is located adjacent to the number 27 and 175 bus routes with 10-15 minute peak frequency and a range of other bus services and is located adjacent to the proposed Bus Connects Route 9, to connect the site to the city centre, an existing cycle lane along Belgard Road and proposed cycle route along Belgard Square North. In addition, the site is within 380m of the Tallaght Centre Luas Stop. The proposal includes the provision of a creche which will meet the needs of the proposed development and consolidate provision in the local area, as well as enhancing the range of facilities and services in Tallaght town centre.

Housing for All – A New Housing Plan for Ireland

- 4.14 The Government's 'Housing for All – A New Housing Plan for Ireland' was published on 2nd September 2021 sets out a series of key pathways to delivering a sustainable housing system in the period to 2030 with the overall aim that *'everyone in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life'*. The Plan sets a target of constructing an average of 33,000 homes per annum until 2030 to meet targets set out for additional households as outlined in the National Planning Framework. Housing is required to satisfy demand for housing across four tenures: affordable, social, private rental and private ownership, and should be *'advanced through the planning process and built within the context of specific development targets for the five cities and major towns'*.
- 4.15 In order to achieve this, Housing for All provides four pathways to achieving four overarching Housing Policy Objectives:
1. Supporting Homeownership and Increasing Affordability
 2. Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;
 3. Increasing New Housing Supply; and
 4. Addressing Vacancy and Efficient Use of Existing Stock.

- 4.16 The Plan has the largest ever housing budget in the history of the state to support these pathways, with in excess of €20bn in funding from the Exchequer, the Land Development Agency (LDA) and the Housing Finance Agency over the next five years. This will also support the creation of an enabling framework of a more sustainable housing system that will meet the housing needs of a generation.

Evaluation of Consistency

- 4.17 The proposed build to rent development is wholly in accordance with the general direction and specific objectives of Housing for All. The proposal will see the delivery of quality rental accommodation and associated facilities in a highly accessible urban location adjacent to high frequency existing and proposed public transport, comprising the proposed Bus Connects Route 9, to connect the site to the city centre, and a designated cycle route. In addition, the site is within 380 metres of the Tallaght Centre Luas Stop. The proposed development will contribute to increasing new housing supply and addressing vacancy through the regeneration of brownfield lands.

Eastern and Midlands Regional Authority Regional Economic and Spatial Strategy 2019

- 4.18 The Regional Spatial and Economic Strategy is a strategic plan and investment framework to shape the future development of the eastern regional to 2031 and beyond. The Eastern and Midland Regional assembly (EMRA) was established in 2015 as part of the regional tier of governance in Ireland.
- 4.19 The principal function of the assembly is the delivery of a Regional Spatial and Economic Strategy (RSES), a new concept in Irish planning where not only the spatial but also the economic factors that go into the future of the region are brought together into one all-encompassing strategy.
- 4.20 Policy RPO 4.3 states the following:

“Support the consolidation and re-intensification of infill / brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburb and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects”

Dublin Metropolitan Area Strategic Plan

- 4.21 The MASP provides a spatial strategy for the development of the Dublin Metropolitan Area and forms a central part of the RSES.
- 4.22 In respect of Dublin City and Suburbs, the MASP seeks to support the National Policy Objectives set out in the NPF through the consolidation and re-intensification of infill, brownfield and underutilised lands with 50% of all new homes to be provided in the existing built-up area of Dublin City and Suburbs in tandem with the delivery of key infrastructure to achieve a population of 1.4 million people by 2031.

“For urban-generated development, the development of lands within or contiguous with existing urban areas should be prioritised over development in less accessible locations. Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.”

- 4.23 The overarching vision statement of the RSES is ‘to create a sustainable and competitive region that supports the health and wellbeing of our people and places,

from urban to rural, with access to quality housing, travel and employment opportunities for all.

- 4.24 A guiding principle for the Metropolitan Area is 'Integrated Transport and Land Use' by focusing growth '*along existing and proposed high quality public transport corridors and nodes on the expanding public transport network*'.
- 4.25 A guiding principle for the growth of the DMA is to achieve '*employment density in the right places... near high quality public transport nodes, near third level institutes and existing employment hubs*'.
- 4.26 As part of the Integration of Land Use and Transport, the RSES aims to support the '10 minute' settlement concept, which is when a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements. The future residents of the proposed development will have all the essential facilities accessible to them in walking distance.
- 4.27 In relation to housing delivery RPO 5.4 states: "*Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments' Guidelines, and 'Urban Development and Building Heights Guidelines for Planning Authorities'.*"

Evaluation of Consistency

- 4.28 The Dublin Metropolitan Area Strategic Plan supports the overall Settlement Strategy and sets out an integrated land use and transportation strategy for the sequential development of the metropolitan area focussed on '*consolidation of Dublin city and suburbs*'.
- 4.29 The proposed development will consolidate the urban footprint, providing higher densities in proximity to existing public transport options and avoiding further inefficient and unsustainable sprawl whilst helping to meet an identified need for quality residential accommodation.
- 4.30 The proposed development will consolidate the existing built-up area of the Dublin Metropolitan Area and promote sustainable compact growth with access to public transport (adjacent to the proposed Bus Connects Route 9) and in close proximity to existing employment hubs, hospitals and third level institutions within Tallaght. The development of the lands at a sustainable density is in accordance with national strategic guidance and in accordance with the proper planning and sustainable development of the area.

5.0 CONSISTENCY WITH SECTION 28 GUIDELINES

- 5.1 The key section 28 guidance documents of relevance to the proposed development are as follows:
- Urban Development and Building Height Guidelines (December 2018);
 - Sustainable Urban Housing: Design Standards for New Apartments (2018);
 - Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
 - Design Manual for Urban Roads and Streets (2013);
 - Guidelines for Planning Authorities on Childcare Facilities (2001);

- Draft Water Service Guidelines for Planning Authorities (2018);
- Quality Homes for Sustainable Communities (2007);
- The Planning System and Flood Risk Management (2009)

5.2 In addition to section 28 guidelines this report also addresses the proposed development in the context of the following documents:

- Transport Strategy for the Greater Dublin Area 2016 – 2035;
- Draft Greater Dublin Area Transport Strategy 2022 - 2042;
- BusConnects – Transforming City Bus Services (2018).

Urban Development and Building Heights (December 2018)

5.2 The Government published the Urban Development and Height Guidelines in 2018. The Guidelines set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040.

5.3 The Guidelines acknowledge that Planning Authorities have set generic maximum height limits that can undermine wider national policy objectives to provide more compact forms of urban development and continue an unsustainable pattern of urban sprawl, rather than consolidating and strengthening the existing built-up area in accordance with National Planning Policy.

5.4 The Guidelines emphasise the policies of the NPF to greatly increase levels of residential development in urban centres and significantly increase building heights and overall density and to ensure that the transition towards increased heights and densities is not only facilitated but actively sought out and brought forward by the planning process and particularly at Local Authority level and An Bord Pleanála level.

5.5 In addition, the Guidelines states that *“the preparation of development plans, local areas plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights”*.

5.6 Under SPPR3 it is a specific planning policy requirement that where (1) an applicant for planning permission sets out how a development proposal complies with the criteria set out at para. 3.2; and (2) the assessment of the planning authority concurs, taking account of wider strategic and national policy parameters set out in the NPF and the Height Guidelines, *then* the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.

Evaluation of Consistency

5.7 With regard to SPPR3, the proposal has been prepared with cognisance of the 2018 Section 28 Guidelines on building heights, as set out in greater detail in the Statement of Material Contravention, and the criteria for higher buildings set out therein, which can be summarised as follows:

- The proposed development is accessible in nature and well served by public transport with high capacity, frequent service and good links to other modes of public transport, being located within 380m of the Tallaght Centre Luas stop as well as Dublin Bus services, located along Blessington Road and Belgard Road.

This is addressed in detail in the accompanying CS Consulting Traffic & Transport Assessment.

- The proposed taller element of Block B will enhance the character and public realm of the area by providing legibility and a strong urban edge to the main urban grain of Blessington Road to the north, with building heights stepping up away from the single storey restaurant building adjacent to the south and complementing the existing 6-7 storey buildings to the west and east.
- The scheme now proposed uses height to achieve a greater density of development, in line with Government Guidelines, while ensuring variety of scale in order to create visual interest and contribute to the creation of an attractive urban environment, enhanced permeability and high-quality public and communal open space. It is noted that density has been reduced following pre-application consultation with SDCC and ABP.
- The higher elements will improve legibility both within the site and for the surrounding area.

5.8 The subject site is served by high quality and high frequency public transport, located c. 380m from the Tallaght town centre Luas terminus and is served by a range of bus services. Capacity and frequency of public transport is detailed in the accompanying CS Consulting Traffic & Transport Assessment.

5.9 The Tallaght LAP was adopted in July 2020, after the Government published the Urban Development and Building Height Guidelines. This Statement of Consistency demonstrates the proposal is in accordance with the strategic and national policies set out in the NPF and other policy documents. The LAP includes height limitations within the lands which are exceeded by the proposed development, as such SPPR 3 applies to the proposed development as it is respectfully submitted that the proposal satisfies the Development Management Criteria (section 3.2 of the Guidelines) as summarised above, and as addressed in detail in the Statement of Material Contravention and therefore may be permitted *“even where specific objectives of the relevant development plan or local area plan may indicate otherwise”*.

Sustainable Urban Housing: Design Standards for New Apartments 2020

5.10 Updated Sustainable Urban Housing Design Standards for New Apartments were published in March 2018 and updated in December 2020. The guidelines provide for revised guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.

Evaluation of Consistency

5.11 This application is accompanied by a Housing Quality Assessment, prepared by Henry J Lyons Architects, which demonstrates that the proposed apartments and associated communal spaces will conform to and exceed the standards set out within Sustainable Urban Housing: Design Standards for New Apartments.

5.12 The following is noted with reference to the Specific Planning Policy Requirements (SPPRs):

Specific Planning Policy Requirement 1 (Mix)

- 5.13 Specific Planning Policy Requirement 1 (SPPR1) states that 'Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)'.
- 5.14 The proposed development comprises Build to Rent apartment accommodation and as per the content of SPPR8 discussed below, no restriction on dwelling mix is applicable. It is considered that the proposed 32% 1-bed, 65% 2-bed and 3% 3-bed units proposed responds appropriately to the projected housing need in the area.

Specific Planning Policy Requirement 2

- 5.15 SPPR2 of the Apartment Guidelines refer to sites of up to 0.25 ha and is not applicable to the subject site.

Specific Planning Policy Requirement 3 (Minimum Areas)

- 5.16 SPPR3 of the Apartment Guidelines 2020 states that the following minimum floor areas for apartments apply:
- Studio apartment Minimum 37 sq.m
 - 1 bedroom apartment Minimum 45 sq.m
 - 2 bedroom apartment Minimum 73 sq.m
 - 3 bedroom apartment Minimum 90 sq.m
- 5.17 The proposed development complies with the minimum apartment floor area requirements set out in SPPR3. The schedule of accommodation / Housing Quality Audit and drawings prepared by Henry J Lyons Architects demonstrates that the proposed development complies and exceeds the standards outlined in the Sustainable Urban Housing: Design Standards for New Apartments 2020.
- 5.18 In addition, the Guidelines state that 'the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10%'. As per SPPR8 of the Guidelines, BTR development is exempt from this requirement, however the proposed development provides a generous quantum (38%) of units which are in excess of 10% larger than the minimum standards set out in the Guidelines. Please refer to the accompanying HQA by HJL for further information.

Specific Planning Policy Requirement 4 (Aspect)

- 5.19 SPPR4 of the Guidelines relates to the provision of dual aspect units and states the following:

"Specific Planning Policy Requirement 4:

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

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

5.20 As confirmed within the HJL Design Statement and Schedule, the proposed development includes 48% dual aspect units. The site is located in a central and accessible location in Tallaght town centre in close proximity to public transport and employment in the context of the Apartment Guidelines. Therefore, the development is in accordance with SPPR4.

Specific Planning Policy Requirement 5 (floor to ceiling heights)

5.21 The apartment blocks comply with the requirement for floor to ceiling heights of 2.7m at ground floor level, with commercial uses at ground floor level providing in excess of 3m floor to ceiling heights, with some double height features included at Block B.

Specific Planning Policy Requirement 6 (Max units per core)

5.22 SPPR 6 notes that a maximum of 12 apartments per core may be provided within apartment schemes. The scheme includes a maximum of 8 apartments per floor per core. BTR developments are not required to comply with this SPPR6 as set out in SPPR8 of the Guidelines.

Specific Planning Policy Requirement 7 & 8 - Build to Rent

5.23 SPPR7 of the 2020 Guidelines applies specifically to BTR development and is set out below:

“BTR development must be:

(a) Described in the public notices associated with a planning application specifically as a ‘Build-To-Rent’ housing development that unambiguously categorises the project (or part of thereof) as a long-term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such. Such conditions include a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period;

(b) Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development.

These facilities to be categorised as:

(i) Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.

(ii) Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.”

- 5.24 In accordance with SPPR7, the proposed development has been described as Build to Rent development within the development description set out within the pre-application form. A draft BTR covenant is also provided with the application.
- 5.25 The proposed development includes Resident Support Facilities in the form of a parcel locker, reception and management office at Block A in close proximity to the set down area at Belgard Square East, maintenance stores, bicycle and refuse storage at basement and ground floor levels and bike repair zone equating to c. 787 sqm. This is complemented by Resident Services and Amenities in the form of coworking spaces at Blocks A and B overlooking the central courtyard, 2 no. gyms at Block B and Block C, yoga deck adjacent to the residents' garden at Block C, 3 no. lounges and games room, providing c. 998 sqm. This equates to a total of c. 1,785 sqm of facilities and amenities throughout the development, providing c. 3.4 sqm per bedroom. This is detailed further with the accompanying Schedule of Accommodation, drawings and design statement prepared by HJL. The operation and management of resident support services and amenities and facilities will be undertaken by a single operator.
- 5.26 SPPR8 of the 2020 Guidelines also applies specifically to BTR development. SPPR8 reads as follows:
- “For proposals that qualify as specific BTR development in accordance with SPPR7:*
- (i) No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;*
 - (ii) Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;*
 - (iii) There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures;*
 - (iv) The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;*
 - (v) The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.”*
- 5.27 In accordance with part (i) of SPPR8, the proposed development provides for a mix of one-bedroom apartments and two-bedroom apartments. This unit mix is predicated on a demand for one-bedroom and two-bedroom units in this location, particularly having regard to the mixed-use context of the proposed development and its proximity to local employment centres and Dublin city centre via existing and proposed public transport connections. The Tallaght area is characterised by a predominance of low density, 3-

and 4-bedroom, semi and detached dwellings and is well-placed to accommodate an element of 1 and 2 bedroom apartment units having regard to the site's 'town centre' location in close proximity to public transport both existing and proposed. The implementation of BTR units will add positively to the overall dwelling mix in the area which remains to be predominantly family-type dwellings.

- 5.28 In accordance with Part (ii) of SPPR8, the proposed development provides for private open space for all units in the scheme. Balconies are provided at each unit with 9 sqm per unit for 3-bed apartments, 7 sqm per unit for 2-bed apartments and 5 sqm for 1-bed units in accordance with (and exceeding) the standards set out at Appendix 1 of the Apartment Guidelines. The proposal meets the standards for storage provision as set out in the HQA.
- 5.29 With reference to communal open space the proposed development would require a communal open space provision of 1,988 sqm based on 5 sqm for 1-bed, 7 sqm for 2-bed (4 person) and 9 sqm for 3-bed apartments. The communal open space provided within the proposed development at various levels) equates to 2,223 sqm, in excess of the requirement of the Apartment Guidelines. This is complemented by a total of 1,026 sqm of public open space representing c. 11.3% of the net site area which is located in the centre of the site which can also be enjoyed and utilised by residents.
- 5.30 The quality of the facilities to be provided, and the standard of residential amenity which will be enjoyed by future residents is illustrated in detail within this planning report and the accompanying documentation prepared by HJL Architects and Parkhood Landscape Architects forming part of this submission.
- 5.31 In accordance with part (iii) of SPPR 8 above, the proposed development includes car parking provision which responds appropriately to the site's location, proximity to existing and proposed public transport links and the Build to Rent nature of the proposals, with 130 car parking spaces proposed at basement level with an additional 4 no. set down spaces serving the creche and 1 no. disabled access space and set down space on the tertiary route. A total of 8 no. share car spaces are included, consolidating this provision, with a total of 763 no. bicycle parking spaces and 6 motorcycle spaces and 8 cargo bike spaces. Bicycle parking provision has been increased to pre-application stage having regard to enhanced commercial floor area at ground floor level, with 20 staff spaces included alongside 214 visitor spaces and 529 residential spaces.
- 5.32 The development places an emphasis on sustainable modes of travel and cyclists will be able to make optimal use of the existing cycle lane on Belgard Road and the proposed cycle route along Blessington Road north of the site. The proposed car parking provision is considered to be appropriate having respect to the site's accessible location with a designated 'town centre' and in close proximity to a range of high frequency public transport connections, third level institutions, employment opportunities and local facilities. In this regard, the car parking provision proposed responds appropriately to the suitability of the site for BTR use in accordance with SPPR8 and has been directly informed by pre-application consultation with SDCC roads department.
- 5.33 All proposed units meet and, in some cases, exceed the minimum floor areas (38%) for one bedroom, two-bedroom and three-bedroom apartments set out within the Guidelines, which will assist in providing a good quality of residential accommodation within the scheme. It is noted that no. 3 apartment types fall within 5% short of the minimum living/dining/kitchen and bedroom widths set out at Appendix 1 of the Guidelines. However, the apartment meets the required minimum overall apartment

floor area and is therefore acceptable having regard to page 35 of the Guidelines which states '*Variation of up to 5% can be applied to room areas and widths subject to overall compliance with required minimum overall apartment floor areas*'. Refer to the HJL HQA for further details.

- 5.34 Notwithstanding the provisions of part (v) of SPPR 8, the proposed development provides for significantly less than 12 units per floor per stair core, with a maximum of 8 apartments per floor per core included.
- 5.35 The Housing Quality Assessment, prepared by Henry J Lyons Architects demonstrates how the proposed apartments comply with Appendix 1 of the Apartment Guidelines 2020 in respect of sizes of apartments, minimum aggregate floor areas, widths, storage, minimum private open space.

Sustainable Residential Development in Urban Areas (2009)

- 5.36 The Sustainable Residential Development in Urban Areas (SRD) Guidelines provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. To assist with this, the Guidelines are accompanied by a Design Manual discussed below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.
- 5.37 The role of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas is to ensure the '*plan led*' delivery of new development throughout the country.

Evaluation of Consistency

- 5.38 The proposed development accords with the Guidelines for Planning Authorities on Sustainable Residential Development (SRD) in Urban Areas (2009) and could be best described as a brownfield, infill site within the built-up town centre of Tallaght, which is located on a public transportation corridor, within c. 380m of the Luas stop at Tallaght Centre and within 75m of Dublin Bus 27 route from Blessington Road to the east.
- 5.39 The SRD note that a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill.
- 5.40 The design approach is based on a need to protect the amenities of the surrounding residential development and the design intent is to protect the amenities of the adjoining neighbours and general character of the area and its amenities. It is considered, that having regard to the location of the site, and national strategic guidance contained in the SRD, the proposed density is appropriate for the subject site.
- 5.41 Section 5.8 of the Guidelines recommends that '*in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes*'.
- 5.42 Owing to the site's town centre location and excellent access to existing and proposed public transport connections, as well as employment centres, third level institutions and

local services and facilities, the proposed density of 342 units per hectare is considered appropriate.

Urban Design Manual – A Best Practice Guide (2009)

Figure 6 – Urban Design Manual 12 criteria



Source: Urban Design Manual DoEHLG 2009

- 5.43 The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications. The 12 criteria are discussed in detail below. This application is accompanied by a Design Statement, prepared by HJL Architects, which demonstrates how the proposed development has regard to and has been developed in accordance with best practice in respect to urban design. The Design Statement should be read in conjunction with this Planning Report and Statement of Consistency and with the plans and particulars accompanying this submission.
- 5.44 The Urban Design Manual is based around 12 criteria that have been drawn up to encapsulate the range of design considerations for residential development based on *“a distillation of current policy and guidance and tried and tested principles of good urban design.”* The 12 no. criteria are assessed as follows:

Context: How does the development respond to its surroundings?

- 5.45 The proposed development responds to its surroundings by providing attractive streets and open spaces, high quality buildings and feature setbacks from neighbouring dwellings. The development has been designed and sited to make optimal use of the subject site, with strong, uniform building lines along the northern, western and eastern perimeters at the public realm, reinforcing the shape and structure of the site. The proposed buildings are setback appropriately from the site boundary and provide a landscaped interface with the public realm, enhancing the aesthetic appearance of the site replacing an existing concrete boundary wall at the location.

- 5.46 The proposed building heights have been designed to graduate moving north, with the 6 and 8 storey Block C to the south of lesser height to allow adequate sunlight access to the central area of public open space and to instil a sense of enclosure to this. The buildings graduate in height to reflect and respond to existing developments to the east and west which rise to 7 storeys. The proposed development includes pop up building heights of 11 and 12 storeys setbacks at the northern elevation with Blessington Road, with a separation distance in excess of 55 metres at this location to the nearest building to the north. Appropriate setbacks are also proposed at the western and eastern boundaries, ensuring neighbouring properties are not significantly impacted by the proposed scheme in terms of light access/ overshadowing or overbearing impacts. The proposed height strategy responds to the established block road layout and provides a robust frontage to the northern perimeter which will bring an element of character through height at this location with Blessington Road.

Connections: How well is the new neighbourhood / site connected?

- 5.47 The proposed development features an integrated model of street design that provides pedestrian and cyclist priority over the motorcar. The proposed development includes a tertiary street through the scheme adjacent to the northern elevation of Block C linking Belgard Road and Belgard Square East which prioritises sustainable modes of travel and is restricted to access by service and emergency vehicles. The development also includes a 'town link' located to the east of the public open space branching north from the tertiary street to Blessington Road at the northern elevation with bicycle parking provided throughout the site at ground floor.
- 5.48 The proposal includes two vehicular entrances at the southwest corner, one providing access to the basement car park and the other providing limited access to the creche set down area via the tertiary route. The proposal includes several points of entry for residents to the scheme throughout the development at ground and basement level and along the site perimeters providing access to Blocks A and B adjacent to the commercial units provided at ground floor level. This provides a welcoming and animated façade at each elevation of the development which is well connected by pedestrian links to Tallaght town centre and the Luas stop to the west, as well as bus stops and cycle lanes on Belgard Road and Blessington Road to the north. The proposed Bus Connects Corridor 9 is routed along the northern perimeter of the site. A good range of educational, employment and recreational facilities are located nearby as set out in Section 1.2 of the accompanying HJL Design Statement.

Inclusivity: How easily can people use and access the development?

- 5.49 The proposed development includes apartments and 10 no. commercial units which are suitable for mobility impaired persons. Landscape design and detailing of roads and footpaths provide for movement throughout the development by mobility impaired persons, in compliance with Building Regulations Part M.
- 5.50 The overall development will include 10% social housing which will be provided within the scheme in the form of 31 no. apartments.
- 5.51 The proposed development will provide a variety of vehicle, pedestrian and cycle routes throughout the site. The internal tertiary route and walking/cycling network provides for a clear navigable route throughout the development with a series of cycle paths and footpaths to increase the overall level of connectivity and permeability for future residents. Bicycle parking is provided throughout the scheme with 214 visitor parking spaces includes adjacent to commercial units to encourage access via bicycle.

The site is located in Tallaght town centre and the town centre Luas stop is a 5 minute walk.

- 5.52 The development will provide for 8 disabled car parking spaces and all communal areas and house types are designed to be accessible to all.

Variety: How does the development promote a good mix of activities?

- 5.53 The proposed development provides for a good mix of dwelling types including a mix of apartments and commercial units. This will ensure a mix of tenures is provided for within the scheme. The proposal also includes a substantial area of public open spaces measuring 1,026 sqm which equates to 11.3% of the net site area.

- 5.54 It is considered that the proposed development provides for the necessary internal amenity and support facilities required for this residential development, whilst having regard to the significant range of community, commercial and social infrastructure in the wider Tallaght area, including the town's retail and commercial centre located c. 300m from the proposed development entrance to the west. The c. 31% increase in commercial floor space to that provided at pre-application stage enhances the range and mix of activities at the development. The inclusion of café, retail, creche and commercial office/ financial services uses complements the residential nature of the development and the emphasis on coworking and working from home which has been accelerated by the Covid-19 pandemic.

- 5.55 The proposed development includes for a substantial amount of usable open space in the form of active and passive open space all of which will cater for a wide range of population. We refer the Board to the enclosed Landscape Design Report and drawings prepared by Park Hood Landscape Architects for further detail.

Efficiency: How does the development make appropriate use of resources, including land?

- 5.56 The proposed development proposes 310 no. dwellings on a net site of c. 0.91 hectares resulting in a gross density of 342 units per hectare. This density makes efficient use of the residential zoned land, which is located within a public transportation corridor, as outlined above.

- 5.57 The proposed development will regenerate a vacant, underutilised site which currently exists as a mix of hard standing and scrub vegetation. As illustrated in the accompanying Parkhood document pack, the focus is on providing green infrastructure at the site. A range of public green open spaces will be created for active and passive recreation, incorporating SUDS features, and a variety of habitats, implementing a net increase in biodiversity levels on the site in comparison to the site's current condition.

- 5.58 The buildings and terrace layouts are orientated north-south to maximise the penetration of sunshine between the buildings and minimise north facing facades. Roof terraces each benefit from southerly aspects, with building height carefully designed and modulated to maximise light access and provide high quality areas of amenity. The central area of public open space and the main area of the residents' garden and communal open space along the southern boundary will receive high levels of sunlight throughout the year. In this respect, the proposal will make optimum use of brownfield land and implement compact growth in accordance with national strategic outcomes and policy objectives of the RSES.

Distinctiveness: How do the proposals create a sense of place?

- 5.59 In this case, the site layout plan has been devised to provide a legible, permeable layout which allows for future connections to the public interface along the northern, western and eastern perimeters. The proposed landscaping strategy will provide an attractive, soft edge to the site at the public realm and attract footfall through active frontage. Internally, a central area of public open space encourages use and activity throughout the day, with commercial units providing dual aspects to the internal courtyard and the external perimeters, animating the ground floor facades in combination with residential amenity.
- 5.60 The Landscape Design Report prepared by Park Hood Landscape Architects sets out in detail the landscaping, which aims to create a strong and positive identity for the proposed development. Stepped building heights moving north and setback upper floors to the central courtyard contribute to the creation of a sense of place, providing passive surveillance whilst negating overbearing impacts. Users will be encouraged to visit and spend time in the courtyard space, with a range of activities provided, including children's play areas and seating.
- 5.61 There is a variety and mix of dwelling types, heights and design, with a mix of apartment buildings, proposed throughout the scheme, thereby providing a distinctive sense of place on site.
- 5.62 As set out in the TVIA prepared by City Designer:
- "The proposed development would bring a welcome central focus to the view [number 5], and an enhanced sense of legibility, its presence indicating that a significant townscape, i.e. Tallaght town centre, lies just beyond the Plaza Hotel building."*
- 5.63 A large number of the new apartments will have views of the town centre of Tallaght and the picturesque background landscape of the Dublin Mountains to the south – providing visual amenity to the residents and enhancing the sense of place, within the proposed development. The development has been designed to maximise the site's southerly aspect, with heights graduating moving north.
- 5.64 The proposed finishes have been carefully considered to provide variety in robust materials, including a mix of brick, spandrel panels and extensive glazing, as well as a mix of street surfaces and planting to provide a distinct character to the area.

Layout: How does the proposal create people-friendly streets and spaces?

- 5.65 The priority for the design team is to propose a pedestrian friendly series of streets and spaces whereby the proposed site layout plan provides for a legible, permeable and distinctive layout. The proposal includes a range of pedestrian and cycle access points along the site perimeters, with residents accessing basement car and bicycle parking via access to the southwest corner of the site. The tertiary route through the site promotes and prioritises sustainable modes of travel and provides a link to the existing cycle network on Belgard Road to the east as well as the proposed 'town link' through the area of public open space linking to Blessington Road to the north. This promotes cycling and walking and discourages the use of the private car, with hard standing minimised at ground level of the site and soft landscaping enhanced.
- 5.66 The structure of the Site Layout Plan is based on the principles of best practice urban design including permeability, connectivity and legibility as set out above. We refer the

Board to the DMURS Compliance Statement prepared by CS Consulting, which sets out how the proposed development provides people-friendly streets.

- 5.67 The proposal includes a landscaped interface with the existing public realm at the northern, western and eastern perimeters, promoting pedestrian and cycle access to various entrances to the residential and commercial aspects of the scheme at these locations.
- 5.68 The proposed layout of the development provides for a straightforward, easily accessible and easily navigable network of places for pedestrians and cyclists. The hierarchy of streets and routes are clearly defined, as per the Tallaght Local Area Plan 2020, with a tertiary route included on site in accordance with the LAP.

Public Realm: How safe, secure and enjoyable are the public areas?

- 5.69 The layout and design of the proposed development has been influenced by the level of security and overlooking to be provided by the future residents. The design of the development has been carefully considered so as to provide a high level of passive surveillance on both the areas of communal open space and public open space. The design of the residential blocks provides for a direct frontage onto all public areas ensuring the provision of a safe, secure and enjoyable residential development.

Figure 7 – Landscape Drawing



Source: Parkhood

- 5.70 The proposed development includes a landscaped buffer to the public interfaces along the northern, western and eastern perimeters characterised by a mix of planting and landscaping features, with the main central area of public open space located between Blocks A and B, also benefiting from passive surveillance from Block C to the south. The 'soft' landscaped edge of the development will attract footfall and encourage internal use of the scheme via the 'town link' at Blessington Road between Blocks A and B as well as via the tertiary route to the south. This encourages use of existing and

proposed cycle lanes on Belgard Road and the surrounding area. Public open space accounts for 11.3% of the site area, in excess of the development plan requirement.

- 5.71 In addition, it is proposed to provide c. 2,223 sqm of communal open space for the apartments at ground floor level, as well as a number of communal terraces within the apartment blocks, providing in excess of the requirements of the Apartment Guidelines relative to communal open space.
- 5.72 The open space provision for the entire scheme was carefully considered by the design team, and it is submitted the detailing and high-quality finish as illustrated in the Landscape Design Statement by Park Hood Landscape Architects, which confirms a high degree of amenity for future residents of the scheme.

Adaptability: How will the buildings cope with change?

- 5.73 Each of the proposed dwellings meets or exceeds the minimum standards for residential unit size. The development provides a mix of 1 and 2-bedroom units.
- 5.74 The overall architectural style is contemporary and reflects the modern requirements to balance lighter, airier elevations with the need to satisfy energy reducing objectives. Similarly, all proposed units incorporate generous space standards so as to provide for adaptable living requirements. The Henry J Lyons Architectural Design Statement provides further detail on the adaptability of the buildings. In addition, Lifecycle Report prepared by HJL provides detail on the robustness of the materials reducing future running costs etc.

Privacy / Amenity: How do the buildings provide a high-quality amenity?

- 5.75 Each dwelling is provided with an area of useable private open space which meets the Development Plan standards. All of the apartments meet or exceed the Section 28 Guidelines unit size requirements. The design of apartments has also had due regard to the siting and orientation of the development in order to maximise solar gain potential and natural light aspect of each dwelling, with the development benefiting from a southerly aspect, increasing in height moving north, with external roof terraces receiving excellent access to sunlight. It is noted all of the apartments exceed the BRE Sunlight Guidelines and through careful siting and design. A total of 48% of the apartments are dual aspect.
- 5.76 This is complemented by the generous quantum of external communal and public open space throughout the site at ground level and internal amenity and support services and facilities, providing a high quality, attractive residential environment.
- 5.77 In this regard, reference should be made to Housing Quality Assessment prepared by Henry J Lyons Architects, which contains a detailed appraisal of the standards achieved in the proposed development in meeting the space and amenity needs of future residents.

Parking: How will the parking be secure and attractive?

- 5.78 It is proposed to provide 130 no. car parking spaces at basement level in addition to set down and disabled access spaces at ground level and 763 no. cycle spaces within the scheme. The apartment units will be provided with a total of 130 no. car spaces at basement level, with 4 set down spaces provided for the crèche use at ground floor level and a disabled access space and set down space adjacent to the tertiary route. A total of 7 no. disabled access spaces are provided, with 1 no. at ground level parallel to the tertiary route with 27 no. EV charging spaces provided at basement level and

the remaining spaces fitted with ducting to facilitate charging points in future. A layby is also included on Belgard Square East to facilitate deliveries.

- 5.79 Residential car parking is provided at basement level via a ramped access from Belgard Square East and is secure and accessible. Creche set down parking area is provided at ground floor level beneath Block C and adjacent to the creche at the western perimeter of the site. Cycle parking is predominantly provided within the basement, with additional secure residential cycle parking at ground floor level of Blocks A and B. A total of 214 visitor cycle parking spaces are included, with 50% of these sheltered. Additional visitor parking is provided at surface level, throughout the site and adjacent to commercial uses around the site edge, with 20 staff parking spaces provided at basement level conveniently located to commercial units with various points of access to ground floor via stairwells.

Detailed Design: How well thought through is the building and landscape design?

- 5.80 The design rationale from an urban design and architectural perspective is explained in the Design Statement prepared by Henry J Lyons Architects. The landscape design rationale is set out in the Landscape Design Statement prepared by Park Hood Landscape Architects. The proposed buildings and landscape are of extremely high-quality design and material quality and would elevate the townscape value of the locality. Please refer to the accompanying Design, Townscape and Visual Assessment by City Designer for more details.

Design Manual for Urban Roads and Streets (DMURS) (2013)

- 5.81 The Design Manual for Urban Roads and Streets (DMURS), 2013 (updated in 2019), sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

Evaluation of Consistency

- 5.82 The DMURS Compliance Statement prepared by CS Consulting Engineers provides detail in respect of the consistency of the proposed development with DMURS. The report sets out how the key principles of DMURS and of design aim to guide a more place-based/integrated approach to road and street design. The proposed development responds appropriately to the aims and objectives of the Tallaght LAP by incorporating a tertiary route through the southern part of the site which will enhance permeability through the development and enhance the public realm in the area. The accompanying DMURS Statement confirms that the proposed scheme has been designed in compliance with DMURS 2019, alongside other relevant guidance. Please refer to this document for further details.

Guidelines for Planning Authorities on Childcare Facilities (2001)

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

- 5.84 Section 4.7 of the Apartment Guidelines 2020 (to be considered in tandem with the Childcare Guidelines) state the following in respect of the provision of childcare facilities:

“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.”

Evaluation of Consistency

- 5.85 The overall proposed development provides for 310 no. residential units. However, the 1-bedroom units are discounted when calculating the childcare provision, as provided for by the 2020 Apartment Guidelines. This exclusion may also apply, in part or whole, to units with two or more bedrooms. As such, a conservative proportion of the two-bedroom units within the proposed development (30%) have also been excluded from the calculation of likely demand generation. This is to reflect that a number of the two-bedroom units may be occupied by single people or couples without children. BTR development may typically be occupied by younger people sharing or older retired people who may be downsizing, reducing the incidence of children of creche age arising from the scheme.
- 5.86 In accordance with the Apartment Guidelines, the total number of units in the scheme which have been included in relation to the requirements for an additional childcare facility amounts to c. 143 no. units. Based on the recommended provision of 20 no. childcare places for every 75 no. units, it is calculated the proposed development may generate the need for c. 38 no. childcare places. The proposed 257 sqm creche is considered to cater for c. 40 childcare places and sufficient to cater for the estimated demand arising from the development.
- 5.87 The development includes a 257 sqm creche with a 157 sqm external play area at Block C with set down area adjacent. The creche is considered appropriately scaled to cater for the anticipated demand arising from the development as detailed above. The proposed creche has been sized to cater for c. 40 children and c. 10 staff, providing full day care, sessional, after school facilities, operating from 7.30am to 6.30pm every weekday. The creche is located at the western part of Block C immediately adjacent to the new access from Belgard Square East, with a set down car parking area provided at the location to limit vehicular movement through the development and minimise noise and disturbance to residential amenity. The creche is generously sized with an external area of 157 sqm. The facility is accessible, located c. 380 metres from the Tallaght Luas stop and c. 150 metres from the bus stop on Bus Connects Corridor 9, as well as proximate to Tallaght town centre, Tallaght Hospital and TU Dublin. The proposal is considered compliant with the Guidelines in this respect. Please refer to the accompanying Social Infrastructure Assessment prepared by JSA for further details.

Draft Water Services Guidelines for Planning Authorities 2018

- 5.88 The Draft Water Services Guidelines for Planning Authorities were published in January 2018 by the DoHPLG, which sets out a clear structure for actively managing

the interface between spatial planning and development and water services planning. The Water Services Guidelines for Planning Authorities have been prepared by the Department of Housing, Planning and Local Government in consultation with Irish Water.

- 5.89 The Guidelines provide best practice guidance in relation to the interface between planning and development functions provided by planning authorities and the delivery of public water services by Irish Water.
- 5.90 The key aims of the Guidelines are to:
- *Provide advice to planning authorities on the operational framework within which Irish Water must operate to deliver water services,*
 - *Establish mechanisms for effective engagement between planning authorities and Irish Water across all the relevant functions of planning authorities, and*
 - *Set out how the planning system, in setting out a spatial framework for growth and development, will relate to and inform the planning and delivery of water services by Irish Water at a national, regional and local level.*
- 5.91 The Draft Guidelines state that it is a requirement for Strategic Housing Development applications to contain evidence that Irish Water has confirmed that it is feasible to provide the appropriate service or services and that the relevant water network or networks have the capacity to service the development.
- 5.92 The Draft Guidelines outline that having regard to the views of Irish Water and having satisfied itself *“that there is a reasonable prospect of the constraint(s) being addressed within the lifetime of the permission, a planning authority or An Bord Pleanála (in the case of a SHD application) may approve, inter alia, this aspect of the development, subject to a condition that requires the applicant to enter into a connection agreement (s) with Irish Water to provide for a service connection to the public water supply and / or wastewater collection networks, as appropriate.”*

Evaluation of Consistency

- 5.93 CS Consulting have consulted with Irish Water on the design of the development and a confirmation of feasibility letter and statement of design response is included with this submission.

Quality Homes for Sustainable Communities – 2007

- 5.94 The Department’s Best Practice Guidelines entitled *‘Quality Housing for Sustainable Communities’* promotes high standards in the design and construction and in the provision of residential and services in new housing schemes. They encourage best use of building land and optimal utilisation of services and infrastructure in the provision of new housing; point the way to cost effective options for housing design that go beyond minimum codes and standards; promote higher standards of environmental performance and durability in housing construction; seek to ensure that residents of new housing scheme enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and provide homes and communities that may be easily managed and maintained.

Evaluation of Consistency

- 5.95 This application is accompanied by a Housing Quality Assessment, prepared by Henry J Lyons Architects, which demonstrates that the proposed houses conform to and exceed the standards set out within the best practice guidelines.

Transport Strategy for the Greater Dublin Area 2016 – 2035

- 5.96 This strategy has been prepared by the National Transport Authority. The Vision of this strategy is for Dublin to be a competitive, sustainable city-region with a good quality of life for all by 2030.
- 5.97 The Strategy includes five overarching objectives to achieve the vision which are as follows:
- *Build and strengthen communities;*
 - *Improve economic competitiveness;*
 - *Improve the built environment;*
 - *Respect and sustain the natural environment;*
 - *Reduce personal stress.*

- 5.98 The Strategy sets out measures to achieve the vision and objectives for the GDA. These include better integration of land use planning and transportation, consolidating growth in identified centres, providing more intensive development in designated town and district centres and control parking supply.

- 5.99 The strategy builds on previous strategies and investment programmes, and for this reason several major infrastructure schemes that are included in the government's transport 21 investment framework are included in all of the strategy options.

Evaluation of Consistency

- 5.100 The proposed development is located c. 75 m from the Dublin Bus stop served by the high-frequency (10-minute peak hour) 75 route, located on Blessington Road, with the site located within 380m of the Luas stop at Tallaght town centre. This is in addition to route nos. 54A, 65, 75, 75A, 77A and 175 bus routes that serve the Blessington Road located 75 metres east of the site, with route no. 76 serving Belgard Road c. 100 metres north of the site. A designated cycle lane exists on Belgard Road to the east. The proposed Bus Connects Route 9 would also directly connect the site to Dublin city centre from a stop on Belgard Square North, approximately 150m north of the site.
- 5.101 The proposed development is in accordance with the over-arching principles of better integration of land use and transportation, along with consolidating growth in Tallaght, as identified in Local Area Plan for the area.

Draft Greater Dublin Area Transport Strategy 2022-2042

- 5.102 This draft strategy has been prepared by the National Transport Authority and was subject to public consultation up to January 2022. The Strategy Aim of this strategy is to provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports economic growth.

5.103 The Strategy includes four Strategic Objectives to achieve the aim which are as follows: An enhanced natural and built environment; connected communities and better quality of life; a strong sustainable economy; and an inclusive transport system.

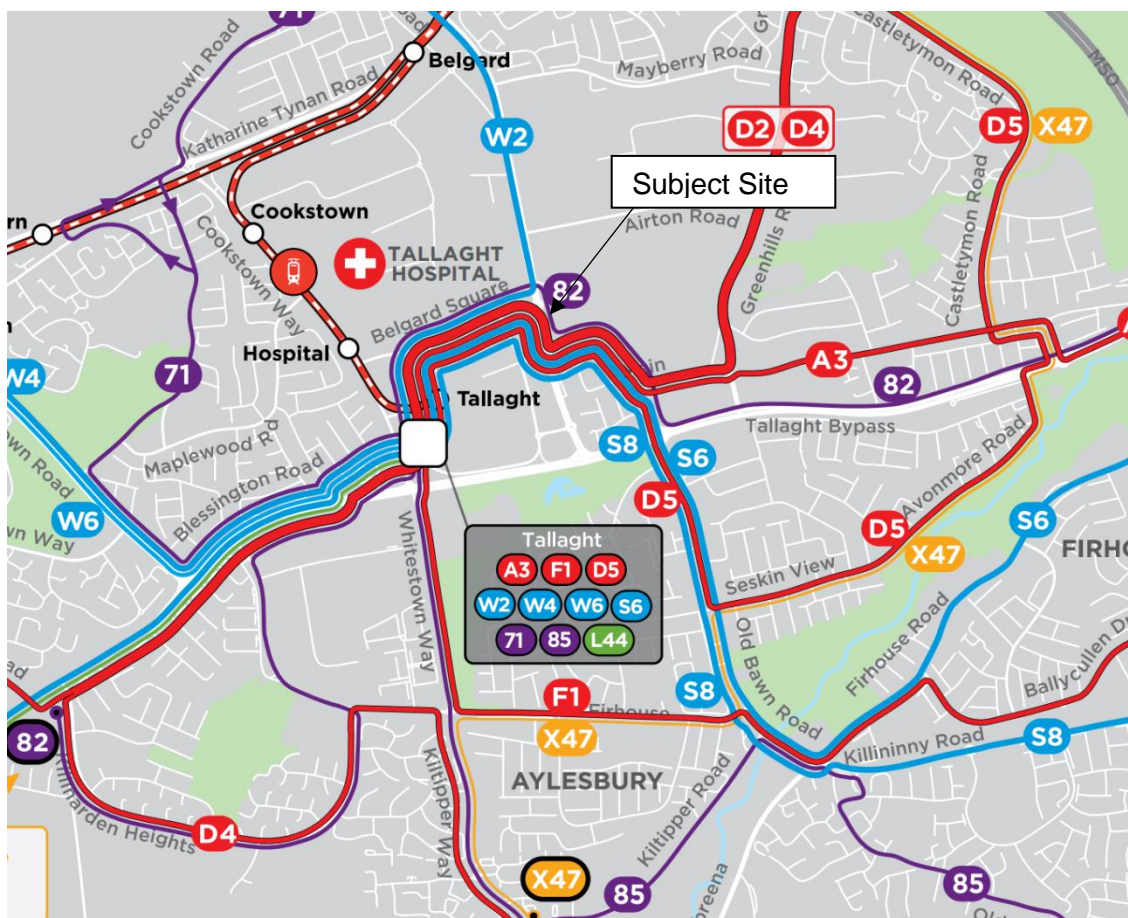
Evaluation of Consistency

5.104 The proposed development is considered to be consistent with the objectives of the draft Transport Strategy as it will enhance the quality of the existing built environment at Belgard Road and Blessington Road, promote a better quality of life for existing and future residents by the regeneration of an underutilised brownfield site with a compatible use and support the use of existing public transport connections whilst also promoting sustainable modes of travel such as walking and cycling.

BusConnects – Transforming City Bus Services (2018)

5.105 The proposed development is located immediately adjacent to the proposed Bus Connects Corridor 9, located to the north along Belgard Square North, with the nearest stop 150 metres from the subject site. The site also benefits from numerous other bus routes. The location of the subject site in respect of the local bus network proposed by BusConnects is shown below. Please refer to CS Consulting Traffic & Transport Assessment and Mobility Management Plan for further details.

Figure 8: Site Location in context of Bus Connects Network(busconnects.ie/maps/)



The Planning System and Flood Risk Management (2009)

5.106 *The Planning System and Flood Risk Management* Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under

Section 28 of the Planning & Development Act 2000 (as amended). The Planning system and flood risk management guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere; adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

Evaluation of Consistency

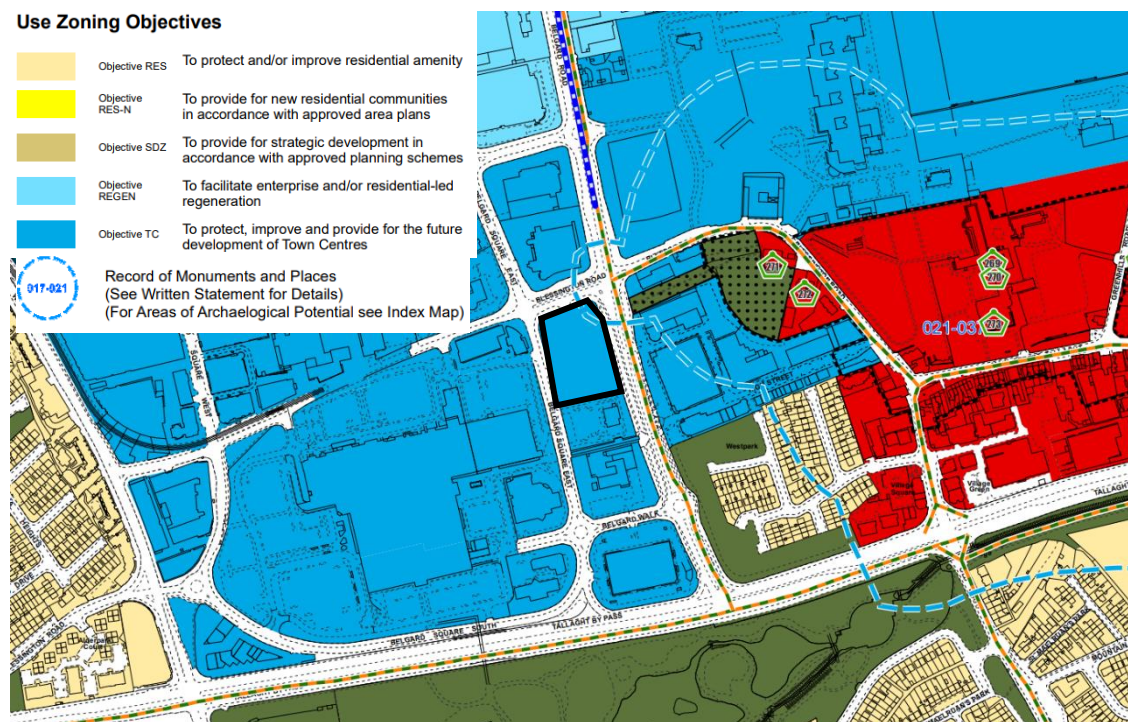
- 5.107 A Flood Risk Assessment has been prepared by CS Consulting Engineers and accompanies this submission. The FRA has been undertaken in accordance with The Planning System and Flood Risk Management (FRM), Guidelines for Planning Authorities (2009) and its Technical Appendices.
- 5.108 As confirmed within the accompanying FRA, the proposed development is located in Flood Zone C. The proposed residential development is considered as 'Highly Vulnerable' in the context of the Guidelines which is 'appropriate' when located in Flood Zone C. The FRA notes that the site is not considered to be at risk from fluvial, coastal and groundwater flooding, with any potential risk from pluvial flooding mitigated by attenuation measures and surface water systems proposed on site. Please refer to the CS Consulting FRA for further details.

6.0 LOCAL PLANNING POLICY – SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2016-2022

- 6.1 The site is located within the administrative area of South Dublin County Council and is therefore subject to the land use policies and objectives of the South Dublin County Development Plan 2016-2022 (CDP).

Zoning

- 6.2 The subject site is zoned as *“Town Centre - To protect, improve and provide for the future development of Town Centres”* under both the Development Plan and LAP. The indicative site location is shown below outlined in black.

Figure 9 – Land Use Zoning (SD CDP 2016-2022 Map 9)

- 6.3 Proposed residential, retail/commercial and café/restaurant uses are 'Permitted in Principle' under Table 11.5 of the CDP.

Archaeology & Conservation

- 6.4 The northeast corner of the subject site is located with an 'Area of Archaeological Potential'. The perimeter Tallaght Architectural Conservation Area including protected structures at St. Maelruan's church is located approximately 150 metres east.

- 6.5 **Comment:** An Archaeology Report prepared by IAC accompanies this submission and concludes:

'Given the results of the assessment the proposed development area is considered to possess a low archaeological potential due to the likely disturbance caused by the modern development in the site. It is probable that any archaeological remains that may have been present within the site would have been negatively impacted upon. As such, the risk of adverse impacts on the archaeological resource as a result of the development going ahead are considered to be low.'

- 6.6 The report recommends that all ground disturbances associated with the proposed development, including site investigations, be monitored by a suitably qualified archaeologist that will be implemented by the applicant.

Core Strategy

- 6.7 The Core Strategy of the development plan has the following objectives relating to Metropolitan Consolidation Towns (such as Tallaght):

CS2 Objective 5: *To promote and support high quality infill development in existing built-up areas.*

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

CS3 Objective 6: *To ensure the phased development of new housing areas in tandem with the delivery of physical and social infrastructure provision as identified within Local Area Plans or as informed by assessments carried out by the Planning Authority.*

Comment: The proposed development provides an intensification and regeneration of under-utilised lands from a vacant infill site to a mixed-use commercial and residential development and will promote higher residential densities in close proximity to high-capacity public transport nodes. The Luas red line stop at Tallaght town centre is located c. 380 metres west of the site. It is submitted that the proposal aligns with both the zoning and the related objectives. The proposed development will implement housing in accordance with the site's Town Centre zoning in the Tallaght LAP including retail and commercial uses, a creche, public open space and a tertiary route through the site consistent with the objectives of the LAP.

Tallaght

- 6.8 Within the development plan Tallaght is classified as both a “*metropolitan consolidation town*” and the “*county town*.” These classifications are due to the areas transport links and large scale of the town centre, with the development plan aiming to grow Tallaght to a “*population of up to 100,000 people*.”
- 6.9 **Comment:** The inclusion of the subject development would aid this by providing 310 new residential units on appropriately zoned lands, as well as commercial units and regeneration of an infill site.

Regeneration and Infill

- 6.10 The development plan is in favour of infill development such as the subject site, under Objectives CS1 O1, CS1 O3 and CS2 O5:

CS1 Objective 1: *To promote and support high quality infill development.*

CS1 Objective 3: *To promote and support the development of undeveloped zoned lands and promote pre-application consultation in accordance with Section 247 of the Planning and Development Act 2000 (as amended).*

CS2 Objective 5: *To promote and support high quality infill development in existing built-up areas.*

- 6.11 The proposed development will regenerate a vacant, brownfield site and support high quality infill development which will contribute positively to the streetscape at the location. The proposed development has been subject to formal pre-application consultation prior to this submission, with details enclosed at Appendix 1. Please refer to the accompanying Design Statement prepared by HJL for details on design and finishes of the development.

Density

- 6.12 The following objectives promote higher densities on appropriate and zoned lands and consider higher densities at certain locations:

H8 Objective 1: *To ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).*

H8 Objective 2: To consider higher residential densities at appropriate locations that are close to Town, District and Local Centres and high-capacity public transport corridors in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).

6.13 However, H8 O5 aims to comply densities with the LAP requirements:

H8 Objective 5: To ensure that developments on lands for which a Local Area Plan has been prepared comply with the local density requirements of the Local Area Plan.

6.14 **Comment:** The proposed development provides a higher density residential development at an appropriate infill location. The density of the site in relation to the LAP plot ratio/density requirement is discussed in the LAP section below.

Retail

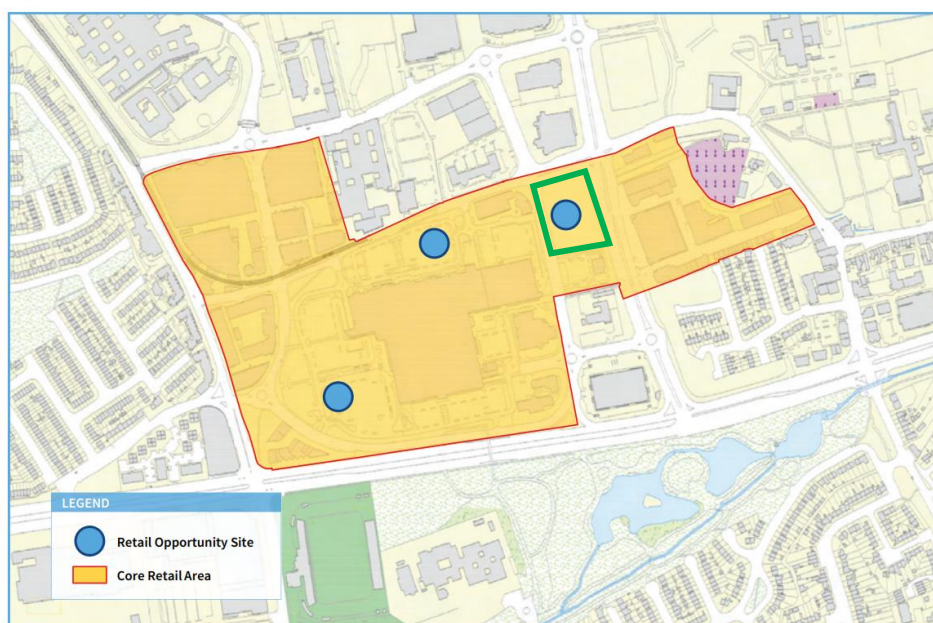
6.15 New retail provision and the development of smaller and medium sized supermarkets are encouraged under R1 O3 and R1 O7:

R1 Objective 3: To support new retail provision in the County to meet the needs of the County's population and to direct new retail floor space into designated retail centres in accordance with the County Retail Hierarchy, so that centres can maintain and expand their retail offer.

R1 Objective 7: To support, subject to identified need, the development of smaller and medium sized supermarkets in preference to superstore and hypermarket outlets, development of which should be generally limited.

6.16 The subject site is identified as a 'Retail Opportunity Site' within the Core Retail Area of Tallaght, shown below in extract of Figure 5.4 of the CDP (indicative site location shown in green).

Figure 5.4 Tallaght Core Retail Area



6.17 Any new retail should be in keeping with the relevant guidelines outlined below:

R1 Objective 1: To have regard to the Retail Planning Guidelines for Planning Authorities, DOECLG (2012), the Retail Strategy for the Greater Dublin Area 2008-

2016, *Regional Planning Guidelines Office (2008) and the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (2010) in defining the role of retail centres and in determining planning applications for retail development.*

RETAIL (R) Policy 2 Sequential Approach

It is the policy of the Council to guide retail development where practical and viable in accordance with the framework provided by the Sequential Approach to enable the vitality and viability of existing town, major retail, village and district centres to be sustained and strengthened.

R2 Objective 1: *To consolidate the existing retail centres in the County and promote town, village, district centre and local centre vitality and viability through the application of a sequential approach to retail development.*

R2 Objective 2: *To direct new major retail floorspace in the County to designated centres of the appropriate level and the identified Retail Opportunity Sites, and to further direct retail development in designated centres into the Core Retail Areas and restrict retail development outside of the Core Retail Area to an appropriate level and form of retail development.*

RETAIL (R) Policy 3 Tallaght Town Centre

It is the policy of the Council to maintain and enhance the primary retailing and major town centre function of Tallaght Town Centre as a Level 2 Retail Centre.

R3 Objective 1: *To continue to develop Tallaght as a vibrant and sustainable County Town at the top of the County's settlement and retail hierarchies, and improve Tallaght's importance in regional retail terms.*

R3 Objective 2: *To facilitate the provision of the highest level and broadest range of retailing in the County in the Core Retail Area of Tallaght Town Centre, along with a broad range of services and functions in the wider Town Centre and Village Centre zonings.*

R3 Objective 3: *To promote the intensification of the Core Retail Area of Tallaght.*

R3 Objective 4: *To promote and encourage the development and redevelopment, to a high standard of urban design, of the identified Retail Opportunity Sites at, and adjacent to, the Square Shopping Centre and the former Woodies site on the Belgard Road.*

- 6.18 **Comment:** The proposed development provides new retail and retail-related services in a sustainable manner, in keeping with guidelines, zoning and the site's location within the Tallaght Town Centre Area. It is noted that Policy R2 Objective 2 seeks to direct '*new major retail floorspace in the County to designated centres of the appropriate level and the identified Retail Opportunity Sites*'. The subject site is identified as an 'Retail Opportunity Site' located within the Core Retail Area of Tallaght town centre. The proposal includes c. 2,289 sqm of commercial use, including c. 1,913 sqm of retail and retail-related services within a mixed-use development that comprises 310 BTR apartments. This is comprised of the following:

Retail/Commercial: 2,289 sqm

- Retail/Restaurant (609 sqm)
- Retail/Class 2 / Professional Services/Office (586 sqm)
- Retail (467 sqm)

- Retail/Café (252 sqm)
 - Creche (257 sqm)
 - Ancillary Space (119 sqm)
- 6.19 It is noted that the subject site is currently vacant and provides no retail space. The proposed development includes a mix of retail, café/restaurant, office/professional services and creche use at ground floor level, consistent with the mixed-use frontages required by the LAP along Belgard Square East, Blessington Road and Belgard Road, contributing positively to an active façade and animated streetscape. The commercial provision has been increased by c. 34% to that proposed at pre-application stage in direct response to the ABP and SDCC opinions.
- 6.20 The proposals direct a significant quantum of retail floorspace to an identified retail opportunity site in accordance with Retail Policy 2 Objective 2. It is noted that the development plan does not identify a threshold of 'major retail floorspace' with the proposals introducing retail and commercial floorspace as part of a mixed-use development including 310 residential units which are essential to the viability of the development and will consolidate the Tallaght town centre Core Retail Area and is appropriate in this respect in accordance with Policy R3 Objective 2, R3 Objective 3 and R3 Objective 4.
- 6.21 Tallaght Town Centre is a Level 2 Major Town Centre within the Retail Hierarchy of the GDA and the County. The Town Centre has well established and significant retail provision of over 72,000 sqm, focused on the Square Shopping Centre as the retail core. Further significant areas of additional retail have been developed over the last 20 years in the Town Centre, including at Tallaght Cross and Tallaght Central, to the northwest of The Square. As is noted in the report by Bannon Property Consultants, a number of the units in this area have remained vacant since they were developed over 12 years ago. While a Marks and Spencer store did open in part of Tallaght Cross, unfortunately it closed after a few years trading and this large unit has remained vacant for a number of years.
- 6.22 Furthermore, again as noted in the planning report, there is a planning permission for a significant extension to the Square Shopping Centre which would provide an additional c.18,000 sqm of retail space. Therefore, there is more than adequate existing and permitted retail floor space available to accommodate likely future retail demand in Tallaght Town Centre. Notwithstanding this, significant further additional retail is provided in the proposed scheme in a range of retail units and retail related services, which will complement the core retail area focused on the Square to the west of the subject site and also help form a retail link to the existing retail units to the east at Tallaght Village, and which will therefore enhance and strengthen the overall retail provision of Tallaght Town Centre, in accordance with the policies and objectives of the Development Plan. This retail provision in the proposed scheme will deliver on the retail opportunities this site presents in the context of the retail structure of the town centre.
- 6.23 The provision of retail and commercial uses at the proposed development has been informed by market research undertaken by Bannon Property Consultants which accompanies this submission. This includes an assessment of the current retail provisions in Tallaght. The report estimates current vacancy of in excess of 17,000 sqm, a rate of 24% of the total stock and notes that *'based on the current vacancy and approved retail space within The Square there is a more than adequate supply currently in place to satisfy this demand'* arising from the development of various Town Centre sites for residential use.

- 6.24 The report recognises the low vacancy in The Square and *'the agglomeration of retail uses within the core can provide a successful and comprehensive range of services and facilities to the wider town centre users'* with the town centre lacking *'residents not more retail'*. Retail is considered to only be viable *'when supported by identifiable retail spend'* which is demonstrated to be lacking through a shortfall in residential uses in the Town Centre. The proposed retail uses are included in accordance with Retail Policy 2 Sequential Approach to *'guide retail development where practical and viable'* to existing town centres to ensure these are *'sustained and strengthened'* and are considered viable in this context and in this location.
- 6.25 The report considers the proposed scale and nature of the commercial uses provided within the scheme, such as financial and professional services *'may work within the subject development'* as they are *'businesses which do not fit naturally in the retail core at The Square'*, being more suited to High Street locations. There may also be scope for medical services at the location. These uses, alongside *'local coffee shops and small-scale food operators... may suit the retail offer'* with viability increased *'given the lower costs associated with service charge and rents'*. The proposed retail and associated uses are complementary to that existing in the town centre area and complementary in this regard, effectively forming a secondary high street provision which assists in linking the old and new Tallaght town centres and respond positively to the existing mix of uses whilst making provision for a mix of uses at the site. This will improve and enhance the variety of services within Tallaght, increasing the intensification of retail and assisting in achieving R3 Objective 4 by the redevelopment of the former Woodies site.
- 6.26 Please refer to the accompanying document by Bannon Property Consultants for further details.

Unit Mix

- 6.27 A range of unit mixes and social housing is promoted within the development plan:
- H1 Objective 4:** *To promote social integration and facilitate a diverse range of dwelling tenures within housing developments, including social housing in a balanced way in all Local Electoral Areas of the County.*
- H10 Objective 1:** *To ensure that new residential developments provide for a wide variety of housing types, sizes and tenures in line with the Interim South Dublin County Council Housing Strategy 2016-2022.*
- 6.28 **Comment:** The proposed development is comprised of 1 (32%), 2 (65%) and 8 (3%) bedroom units, that provide a range within the smaller variety of Build-to-Rent housing. In relation to social housing, the development will provide 31 social housing units under the Part 5. These are incorporated into the overall development and will provide integrated and high-quality social housing.
- 6.29 The proposal includes a mix of apartment types and tenures which will contribute positively to the range of dwelling types in Tallaght. The BTR apartments adds to the tenure of the local area, with just one other BTR scheme permitted within a 10-minute walk of the subject site at Glen Abbey (ABP Ref: 309916-21). The proposal also includes a mix of tenures, with 10% of the apartments being provided for social housing, with the balance for market rental. This adds to the dwelling mix and tenure in the area, with low density 3- and 4-bedroom family homes located in Tallaght to the east of the site at Westpark and to the south at Old Bawn Road. The proposals are compliant with the Housing Strategy which states a need for a range of dwelling types and mix.

Design:

- 6.30 The creation of sustainable communities is a policy and objective of the development plan generally and in relation to the Guidelines on Sustainable Residential Development and Urban Design Manual.

HOUSING (H) Policy 6 Sustainable Communities *It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.*

H7 Objective 1: *To ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).*

- 6.31 This is compounded by objectives relating to high quality design, design and development standards and adaptability relating to government documents such as the New Apartment Design Standards (2015), Guidelines for Sustainable Residential Development (2009), Urban Design Manual, and Sustainable Communities (2007):

H11 Objective 1: *To promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in Chapter 11 Implementation.*

H14 Objective 1: *To ensure that all residential units and residential buildings are designed in accordance with the relevant quantitative standards, qualitative standards and recommendations contained in Sustainable Urban Housing: Design Standards for New Apartments (2015), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the companion Urban Design Manual and have regard to the standards and targets contained in Quality Housing for Sustainable Communities (2007), particularly the standards and recommendations that relate to internal amenity/layout, overall unit size, internal room sizes, room dimensions, aspect, sound insulation, communal facilities, storage, sustainability and energy efficiency.*

H14 Objective 2: *To support adaptable housing layouts that can accommodate the changing needs of occupants, through extension or remodelling.*

- 6.32 **Comment:** The proposed development has been carefully designed to provide a high-quality residential environment and amenity for future residents and the surrounding area. A design statement has been provided by HJL Architects as part of this application. This statement provides an in-depth explanation of the design proposed and the response to the Design Manual 12 Criteria. The remaining guidelines and standards have been assessed in the previous section.

Public Realm:

- 6.33 In relation to public realm, the Development Plan details the following objectives for positive placemaking, infill design and street frontage:

H7 Objective 2: *To ensure that residential development provides an integrated and balanced approach to movement, place-making and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013).*

H7 Objective 3: *To support public realm improvements as part of infill developments.*

H15 Objective 2: *To ensure that all developments are designed to provide street frontage and to maximise surveillance of streets and spaces.*

- 6.34 **Comment:** The Design Manual for Urban Roads and Streets has been complied with as part of the overall design. In addition, the development provides an active street frontage, with commercial units, providing surveillance while planting and landscaping improve the public realm and design of the site. The proposed ground floor commercial units work collectively with the residential amenity spaces at these locations, providing a continuous active frontage along the public realm interface on three sides of the development. This will enhance and integrate with the public realm whilst also providing a dual aspect element to the internal public courtyard at the centre of the development.

Building Height:

- 6.35 The LAP for the site has defined height limits that are addressed in the LAP section. The development plan has broader requirements set out below:

H9 Objective 1: *To encourage varied building heights in new residential developments to support compact urban form, sense of place, urban legibility and visual diversity.*

H9 Objective 2: *To ensure that higher buildings in established areas respect the surrounding context.*

H9 Objective 3: *To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing (see also Section 11.2.7 Building Height).*

- 6.36 **Comment:** The proposed development ranges in height from 6 to 12 storeys. This includes a graduation in height moving north through the site, with 11 and 12 storeys at the northern perimeter, providing an element of legibility to the Blessington Road frontage. The height strategy reflects the content of the LAP, with greater height on the eastern side of the site. Setback building lines contribute to generous separation distances between the proposed development and neighbouring properties. The proposal complements and reflects the existing 6-7 storey developments neighbouring to the west and east, stepping up away from the single storey restaurant to the south.

Energy:

- 6.37 Ensuring energy efficiency and low carbon district heating are objectives set out below:

H11 Objective 2: *To promote new residential developments taking account of energy efficiency, prioritising passive house construction standards, as well as renewable energy opportunities, including solar energy where appropriate, in accordance with Part L of the Building Regulations.*

E6 Objective 3: *To ensure that all development proposals in Low Carbon District Heating Areas of Potential carry out an Energy Analysis and explore the potential for the development of low carbon district heating networks.*

- 6.38 **Comment:** A Part L compliance statement has been prepared by Axiseng Engineering and is submitted as part of this application.

Public Open Space:

- 6.39 The Development Plan objective relating to public open space aims to ensure sufficient, high quality open space is provided and this still space has recreational potential, passive surveillance and a clear definition.

H12 Objective 1: *To ensure that public open space in new residential developments complies with the quantitative standards set out in Chapter 11 Implementation and the qualitative standards set out in Chapter 11 and Chapter 4 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009), together with the design criteria illustrated under the Urban Design Manual – A Best Practice Guide, DEHLG (2009).*

H12 Objective 2: *To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development.*

H12 Objective 3: *To enhance the recreational value of open spaces that serve existing residential areas as part of any future infill developments.*

G4 Objective 3: *To enhance and diversify the outdoor recreational potential of public open spaces and parks, subject to the protection of the natural environment.*

11.3.1: Residential (iii) Public Open Space / Children's Play

- *In all other zones all new residential development shall be required to incorporate a minimum of 10% of the total site area as public open space.*
- *Developments of 50 units or over shall include formal provision for children's play in semiprivate or public open spaces through provision of a Young Children's Area for Play (YCAP), or a Local Equipped Area for Play (LEAP) or a Natural Play Area.*

- 6.40 **Comment:** The proposed development provides high quality open spaces that provide an active interface with the public realm to the north, west and east perimeters and include a range of planting and mixed landscaping materials. This is complemented by a large central courtyard including a range of passive and active recreation (including nature-based children's play areas) and permeable pedestrian and cycle routes through the site. The total public open space provision equates to 11.3% of the overall site area, in excess of the 10% requirement for public open space on brownfield sites set out in Chapter 11 Implementation and Chapter 4 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009), together with the design criteria illustrated under the Urban Design Manual – A Best Practice Guide, DEHLG (2009).

- 6.41 Public open space is clearly defined to communal provision which is provided to the south of Block C and within various roof terraces across each of the blocks, only accessible to residents. Tree lines are provided along Belgard Square East and Belgard Road, complementing existing planting and landscaping at the edge of the site, with public open space design in accordance with the qualitative standards in the SRD Guidelines and Chapter 11 of the CDP. Parkhood have prepared and submitted a Landscape Design & Access Statement as part of this submission which describes the landscape strategy in detail.

Private Open Space:

- 6.42 Regarding private open space, the development plan aims to safeguard adequate standards for size and depth as well as supporting a range of uses, privacy, security, high quality design and a clearly defined space:

H13 Objective 1: *To ensure that all private open spaces for apartments and duplexes including balconies, patios and roof gardens are designed in accordance with the qualitative and quantitative standards (including minimum balcony size and depth) set out under Sustainable Urban Housing: Design Standards for New Apartments, DECLG (2015), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide, DEHLG (2009).*

H13 Objective 2: *To ensure that new apartments have access to high quality and integrated semi-private open space that supports a range of active and passive uses, in accordance with the quantitative standards set out in Chapter 11 Implementation.*

H15 Objective 1: *To ensure that there is a clear definition between private, semi-private and public open space that serves residential development.*

H15 Objective 3: *To ensure that private open spaces are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security.*

H15 Objective 4: *To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity.*

Table 11.21: Minimum Space Standards for Apartments

TYPE OF UNIT	APARTMENTS	PRIVATE OPEN SPACE	COMMUNAL OPEN SPACE	STORAGE
Studio	40 sq.m	4 sq.m	4 sq.m	3 sq.m
One Bedroom	45 sq.m	5 sq.m	5 sq.m	3 sq.m
Two Bedroom	73 sq.m	7 sq.m	7sq.m	6 sq.m
Three Bedrooms	90 sq.m	9 sq.m	9 sq.m	9 sq.m

- 6.43 **Comment:** All proposed apartments benefit from private balconies which are sized in accordance with Appendix 1 of the Sustainable Urban Housing: Design Standards for New Apartments 2020 which have superseded the 2015 version stated in H13 Objective 1, as well as the SRD Guidelines 2009. All balconies are fitted with a balustrade for safe and sheltered environment. All private open space balconies provided are in compliance with Table 11.21 of the Development Plan.
- 6.44 Communal roof terraces are provided at sixth storey level at Block C, seventh storey level at Blocks A and B and eighth storey level at Block B. Roof terraces include community gardens, lawns and seating areas, as well as informal play areas enclosed by permeable blocks.
- 6.45 The remainder of the roofs are provided as green roofs, planted with sedum/wildflower contributing to water retention at the development. All planting and landscaping features are sensitively designed to withstand the elements, as detailed with the accompanying documents prepared by Parkhood.

Privacy:

- 6.46 Section 10 of the Urban Design Manual (2009) addresses privacy and amenity. A separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy. Reduced distances will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy.
- 6.47 **Comment:** The proposed development includes separation distances of c. 31 metres between Blocks A and B across the central courtyard. Approximately c. 11 metres separation distances are included at the southern ends of Blocks A and B to Block C. Where this is the case, windows have been designed to be translucent and high level on the southern ends of Blocks A and B to mitigate overlooking potential, with the majority of these windows serving bathrooms. In accordance with Section 11.3.1 (v) of the CDP, these reduced distances are considered appropriate having regard to the proposed density of the development and infill nature at an urban location which will promote compact growth. The architectural solution maintains a high standard of privacy, as detailed within the accompanying HJL drawings and the BPG3 daylight and sunlight reports which note that subject rooms achieve good levels of average daylight factor in accordance with the BRE recommended guide.
- 6.48 The Board may consider the proposed separation distances between Blocks A and B with Block C to be a material contravention of Section 11.3.1(v) of the County Development Plan 2016-2022. Please refer to the accompanying Statement of Material Contravention with the South Dublin County Development Plan 2016-2022 and Tallaght LAP 2020 for further details.

Childcare:

- 6.49 In accordance with to Policy C8, Policy C8 Objective C8 2 and Section 11.3.11 the proposed development provides a 257 sqm creche facility which is considered appropriate to cater for the estimated demand of c. 38 childcare places which may arise from the development. Please refer to the accompanying Social Infrastructure Assessment for further details.

Policy C8 (b) *It is the policy of the Council to require the provision of new childcare facilities in tandem with the delivery of new communities.*

C8 Objective 2: *To require childcare infrastructure to be provided in new communities on a phased basis in tandem with the delivery of residential development, in accordance with the phasing requirements of Local Area Plans or approved Planning Schemes.*

Green Infrastructure:

- 6.50 The development plan outlines the following objectives in relation to green infrastructure:

G1 Objective 1: *To establish a coherent, integrated and evolving Green Infrastructure network across South Dublin County with parks, open spaces, hedgerows, grasslands, protected areas, and rivers and streams forming the strategic links and to integrate the objectives of the Green Infrastructure Strategy throughout all relevant Council plans, such as Local Area Plans and other approved plans.*

G2 Objective 5: *To integrate Green Infrastructure as an essential component of all new developments.*

G5 Objective 2: *To promote the provision of Green Roofs and/or Living Walls in developments where expansive roofs are proposed such as industrial, retail and civic developments.*

G4 Objective 2: *To connect parks and areas of open space with ecological and recreational corridors to aid the movement of biodiversity and people and to strengthen the overall Green Infrastructure network.*

G6 Objective 1: *To protect and enhance existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design process.*

G6 Objective 2: *To require new development to provide links into the wider Green Infrastructure network, in particular where similar features exist on adjoining sites.*

- 6.51 **Comment:** The proposed development provides planting and green infrastructure in the form of tree lines along perimeters, a landscaped buffer to the south and a range of planting, grassed areas and rain gardens across the site. Green sedum roofs and wildflower meadows are provided at roof level, with communal gardens included, boosting biodiversity and creating habitats at the location. The central area of public open space at the courtyard has been refined and additional planting and activities included to design at pre-application stage, with edge of the site planting complementing existing landscaping at the location.

Drainage and Water Management:

- 6.52 Under the development plan, SUDS, water management within open space and the impact of climate change must all be considered within new applications:

G5 Objective 1: *To promote and support the development of Sustainable Urban Drainage Systems (SUDS) at a local, district and county level and to maximise the amenity and biodiversity value of these systems.*

G6 Objective 3: *To require multifunctional open space provision within all new developments that includes provision for ecology and sustainable water management.*

E4 Objective 1: *To ensure that medium to large scale residential and commercial developments are designed to take account of the impacts of climate change, including the installation of rainwater harvesting systems, and that energy efficiency and renewable energy measures are incorporated in accordance with national building regulations, policy and guidelines.*

- 6.53 **Comment:** SUDS features have been incorporated into the proposed development, including permeable paving, rain gardens, tree pits and green roofs, as well as a range of energy efficient, green and sustainable practices. Further details of these can be found in the CS Consulting Engineering Services Report.

Car Parking

- 6.46 Tables 11.23 and 11.24 of the Development Plan set out the maximum parking rates for residential development. Parking rates are divided into two main categories, Zone 1 and Zone 2. The subject development is located in Zone 1, the proposed car parking is below that of the development plan, which are stated as maximum standards.

Use	Standard	Zone 1	Maximum Development Plan Standard	Proposed
Apartment / duplex	1 bed	0.75	99	-
	2 bed	1	203	-
	3 bed	1.25	10	-
Commercial		1 per 25 sqm	78	-
Creche		0.5 per classroom	4	-
		Total	365	130

6.47 Accompanying text states that:

The number of spaces provided for any particular development should not exceed the maximum provision. The maximum provision should not be viewed as a target and a lower rate of parking may be acceptable subject to:

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

6.48 The subject site is located within a 380m of the Luas Tallaght Centre station and with 100m of bus stops on Belgard Square North and Blessington Road served by high frequency Dublin Bus services. Belgard Square North is indicated as an indicative high-capacity bus route in the Tallaght LAP and the Bus Connects Corridor 9 linking to Dublin city centre with services stopping at Belgard Square North approximately 150m to the north. In this regard, the site is well served by high-quality public transport. This is clearly set out in the accompanying Design Statement prepared by Henry J Lyons.

6.49 The subject site benefits from proximity to a range of services and facilities, located within Tallaght town centre including everyday retail and commercial activities, as well as medical and educational uses. This provides the opportunity for residents to walk or cycle to work in the surrounding area, reducing the reliance on the private car. A Mobility Management Plan prepared by CS Consulting is submitted with the application, setting out the site's attributes in terms of public transport links and pedestrian and cycle infrastructure. The accompanying Social Infrastructure Assessment by JSA provides an overview of the provision of services and facilities in the surrounding area.

6.50 The TTA prepared by CS Consulting confirms that the surrounding road network can cater for an increase in traffic. The proposed car parking quantum has been subject to discussion with South Dublin County Council who are agreeable to the 130 no. car parking spaces included.

- 6.51 We also note Transport and Mobility (TM) Policy 7 which relates to car parking. TM7 Objective 1 aims:
- “To carefully consider the number of parking spaces provided to service the needs of new development.”*
- 6.52 TM7 Objective 2 aims:
- “To effectively design and manage parking to ensure the efficient turnover of spaces.”*
- 6.53 TM7 Objective 3 aims:
- “To ensure that car parking does not detract from the comfort and safety of pedestrians and cyclists or the attractiveness of the landscape.”*
- 6.54 TM7 Objective 4 aims:
- “To make provisions for the use of electric vehicles through a significant increase in the provision of clearly and exclusively designated electric car charging points on public and private land in partnership with ESB and other relevant stakeholders and landowners.”*
- 6.55 Proposed car parking has been designed to comply with the provisions of the CDP in terms of mobility and will help to ensure the provision of EV charging points (20% of all parking spaces provided with EV charging point) whilst respecting the safety of pedestrians and cyclists. The accompanying TTA prepared by CS Consulting further justifies the proposed provision.

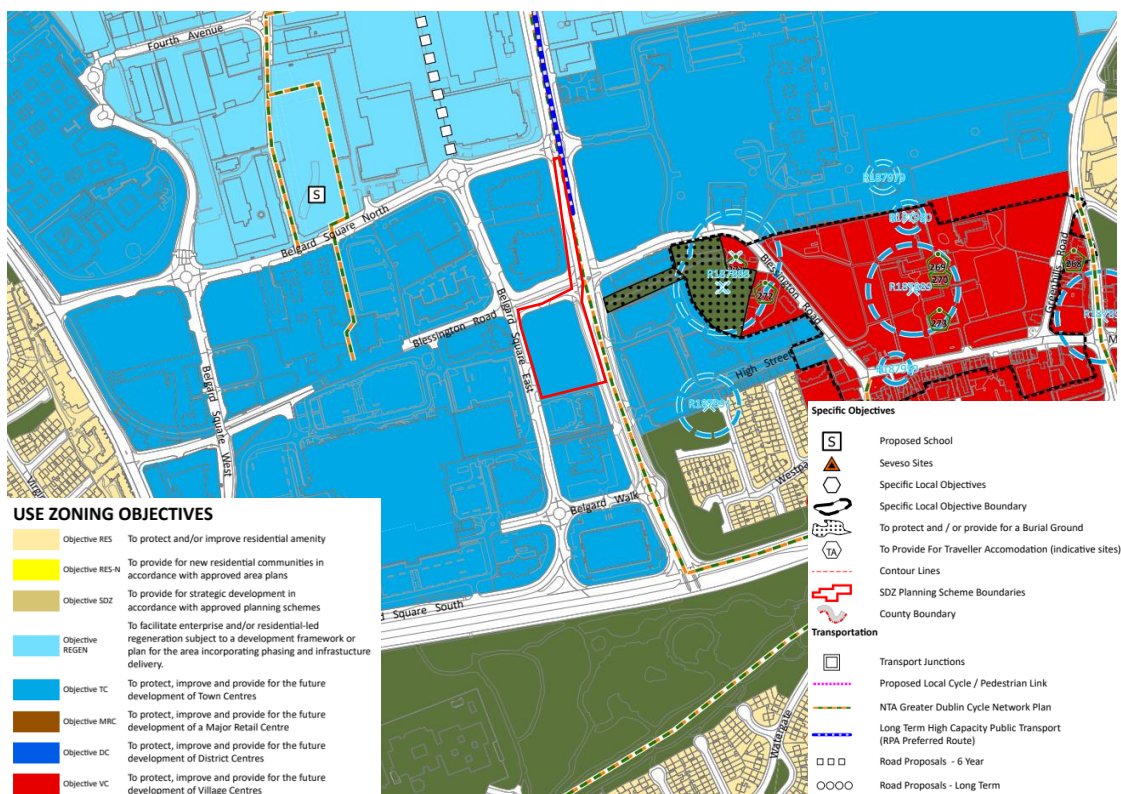
DRAFT SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028

- 6.56 The draft development plan for South Dublin County Council is expected to come into effect in August 2022 and will therefore be the Plan in place at the time of the Board’s decision on this application. An assessment of the proposed development against the relevant criteria of the draft Plan is set out below, as proposed to be amended by the Material Amendments published in March 2022.

Zoning

- 6.57 Chapter 13: Implementation and Monitoring sets out land use zoning objectives for the County. The subject site is zoned as *“Town Centre - To protect, improve and provide for the future development of Town Centres”* under the parameters of the Draft Plan. A small part of the subject site extends into the public road and footpath network to facilitate infrastructure connections and landscaping.

Figure 10: Land Use Zoning Objectives Map Sheet 9 (Draft SD CDP 2022-2028)



6.58 Proposed residential, childcare facilities, shop - neighbourhood, restaurant/café, offices 100 sqm – 1,000 sqm uses are 'Permitted in Principle' under Table 13.5 of the Draft CDP.

Core Strategy & Settlement Strategy

6.59 The relevant policies objectives as they relate to the subject development are noted and responded to as follows.

Policy CS6: Settlement Strategy - Strategic Planning Principles

Promote the consolidation and sustainable intensification of development within the urban settlements identified in the settlement hierarchy.

CS6 Objective 1: *To implement the Growth Strategy detailed in the RSES and in particular, the delivery of sustainable growth in the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (consistent with RPO 3.1)*

CS6 Objective 2: *To promote compact growth and to support high quality infill development in existing urban built-up areas by achieving a target of at least 50% of all new homes to be located within or contiguous to the built-up area of Dublin City and Suburbs (consistent with NSO 1, RSO 2, NPO 3b and RPO 3.2).*

CS6 Objective 3: *To promote compact growth and to support high quality infill development in existing urban built-up areas, outside Dublin City and Suburbs, by achieving a target of at least 30% of all new homes to be located within or contiguous to the CSO defined settlement boundaries (consistent with NPO 3b and RPO 3.2).*

CS6 Objective 4: *To promote higher densities (50+ units per hectare) subject to meeting qualitative standards at appropriate locations, in urban built-up areas,*

especially near urban centres and/or high-capacity public transport nodes in line with prevailing Section 28 Ministerial Guidelines and where it can be demonstrated that the necessary infrastructure is in place or can be provided to facilitate the development.

CS6 Objective 5: *To design future development in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive, universally accessible street environment for pedestrians and cyclists, where adequate transport links are in place, or will be situated, close to new developments and, insofar as possible, to existing developments which need them.*

CS6 Objective 6: *To support, through the compact growth model in the Core Strategy and settlement strategy and by ensuring population growth and plot densities are sustainable, the just transition to a climate resilient, biodiversity-rich, environmentally sustainable and carbon neutral economy before 2050.*

- 6.60 The proposed development will assist in delivering on national and regional objectives to deliver at least 50% of all new homes within the built-up area of Dublin City and Suburbs which includes Tallaght. The site is brownfield in nature and its redevelopment will deliver on compact urban form objectives. The proposed density of 342 uph is an efficient use of land as a resource.

Policy CS7: Consolidation Areas within the Dublin City and Suburbs Settlement

Promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary.

CS7 Objective 1: *To promote more intensive population and employment uses focussing on good community, civic and school facilities, good quality streets and spaces whereby existing and new neighbourhoods are knitted together alongside essential infrastructure and amenities that are required to develop sustainable communities and employment within the key urban centres, consistent with RPO 4.3.*

CS7 Objective 3: *To promote and support the development of undeveloped infill and brownfield zoned lands and to promote pre-application consultation in accordance with Section 247 of the Planning and Development Act, 2000 (as amended) (consistent with RPO 4.3).*

- 6.61 The proposed development will deliver a more intensive population and employment use within a key urban centre, Tallaght. The site is a brownfield site, zoned town centre with the objective to deliver a mix of uses as is proposed. The proposal will implement a childcare facility alongside other retail and commercial uses contributing to the vitality of the town centre area and promotes permeability through the site in the form of a tertiary route as well as pedestrian and cycle routes.

Natural, Cultural and Built Heritage

- 6.62 Relevant policies and objectives in respect of the above are set out at Chapter 3 of the Draft CDP with those relative to the proposed development noted below.

Policy NCBH2: Biodiversity

NCBH2 Objective 1: *To support the implementation of the National Biodiversity Action Plan (2017-2021) and the All-Ireland Pollinator Plan (2021-2025) and to support the adoption and implementation of the South Dublin County Biodiversity Action Plan (2020-2026) and Pollinator Action Plan (2021-2025) and any superseding plans.*

NCBH2 Objective 2: *To ensure the protection of designated sites in compliance with relevant EU Directives and applicable national legislation.*

NCBH2 Objective 3: *To protect and conserve the natural heritage of the County, and to conserve and manage EU and nationally designated sites and non-designated locally important areas which act as 'stepping stones' for the purposes of green infrastructure and Article 10 of the Habitats Directive.*

NCBH2 Objective 4: *To protect our rivers and in particular to avoid overdevelopment which could have an adverse effect on the biodiversity and ecosystems of the river.*

Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas

NCBH5 Objective 2: *To ensure that an Ecological Impact Assessment is undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals.*

Policy NCBH10: Invasive Species

NCBH10 Objective 1: *To ensure that development proposals do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, applicants should submit a control and management programme with measures to prevent, control and/or eradicate the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).*

- 6.63 An Ecological Impact Assessment has been prepared by Enviroguide as part of the application. The subject site exists as a vacant site with boundary wall. The EclA concludes:

'It is considered that as the mitigation measures proposed to protect the local biodiversity within the vicinity of the Proposed Development are carried out in full, there will be no significant negative impact to any valued habitats, or individual or group of species as a result of the Proposed Development.

With the successful implementation of these measures and proposed works, to be carried out in accordance with the landscape plan, there will be no significant negative ecological impacts arising from Construction and Operational Phases of the Proposed Development.'

- 6.64 An Appropriate Assessment Screening Report and Hydrological Risk Assessment have been prepared and are submitted with the application. Please refer to these reports for further details.
- 6.65 The proposal includes a comprehensive landscaping strategy which includes significant elements of planting, providing a net increase in species and biodiversity at the site in accordance with the above objectives. Please refer to the accompanying Parkhood documents for further details.

Policy NCBH3: Natura 2000 Sites

NCBH3 Objective 1: *To prevent development and activities that would adversely affect the integrity of any Natura 2000 site located within or adjacent to the County and promote the favourable conservation status of the habitats and species integral to these sites.*

NCBH3 Objective 3: *To ensure that planning permission will only be granted for a development proposal that, either individually or in combination with existing and/or proposed plans or projects, will not have a significant adverse effect on a European Site, or where such a development proposal is likely or might have such a significant adverse effect (either alone or in combination), the planning authority will, as required by law, carry out an appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92/43/EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the development proposal will not adversely affect the integrity of any European site, will the planning authority agree to the development and impose appropriate mitigation measures in the form of planning conditions. A development proposal which could adversely affect the integrity of a European site may only be permitted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation.*

- 6.66 An Appropriate Screening Report and Hydrological Risk Assessment have been prepared and are submitted with the application in accordance with the above objectives and to fully assess the potential impact of the proposed development upon Natura 2000 sites. The AA Screening concludes:

‘On the basis of the screening exercise carried out, it can be concluded, on the basis of the best scientific knowledge available, that the possibility of any significant effects on any European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a Natura Impact Statement (NIS) is not required.’

- 6.67 Please refer to these for further details.

Policy NCBH11: Tree Preservation Orders and Other Tree Protections

NCBH11 Objective 3: *To protect and retain existing trees, hedgerows, and woodlands which are of amenity and/or biodiversity and/or carbon sequestration value and/or contribute to landscape character and ensure that proper provision is made for their protection and management taking into account Living with Trees: South Dublin County Council’s Tree Management Policy (2015-2020) or any superseding document and to ensure that where retention is not possible that a high value biodiversity provision is secured as part of the phasing of any development to protect the amenity of the area.*

- 6.68 There are no tree preservation orders or other tree protections on the application site. A small number of low value ‘C Category’ trees and hedgerow are to be lost to development as part of the proposals, as detailed within the accompanying Arboricultural Report and drawings prepared by Charles McCorkell. The proposal includes a comprehensive landscaping strategy which includes significant elements of planting, providing a net increase in species and biodiversity at the site and enhance the amenity of the area.

Policy NCBH13: Archaeological Heritage

NCBH13 Objective 1: *To favour the preservation in-situ of all sites, monuments and features of significant historical or archaeological interest in accordance with the recommendations of the Framework and Principles for the Protection of Archaeological Heritage, DAHGI (1999), or any superseding national policy document.*

NCB13 Objective 2: *To ensure that development is designed to avoid impacting on archaeological heritage including previously unknown sites, features and objects.*

- 6.69 The northeast corner of the subject site is located with an 'Area of Archaeological Potential'. An Archaeology Report prepared by IAC accompanies this submission and notes no evidence of features of significant historical or archaeological interest on the subject site. The report concludes:

'Given the results of the assessment the proposed development area is considered to possess a low archaeological potential due to the likely disturbance caused by the modern development in the site. It is probable that any archaeological remains that may have been present within the site would have been negatively impacted upon. As such, the risk of adverse impacts on the archaeological resource as a result of the development going ahead are considered to be low.'

Policy NCBH14: Landscapes

NCBH14 Objective 2: *To ensure that development is assessed against Landscape Character, Landscape Values and Landscape Sensitivity as identified in the Landscape Character Assessment for South Dublin County (2021) in accordance with Government guidance on Landscape Character Assessment and the National Landscape Strategy 2015-2025.*

NCBH14 Objective 4: *To require a Landscape/Visual Impact Assessment to accompany all planning applications for significant proposals, located within or adjacent to sensitive landscapes and to provide mitigation measures to address any likely negative impacts.*

- 6.70 The planning application is accompanied by a Design Townscape and Visual Assessment prepared by City Designer in accordance with the above. The site appears to be located with an area of landscape sensitivity defined as 'N/A' in Figure 3.2 of the draft Plan, shown below.

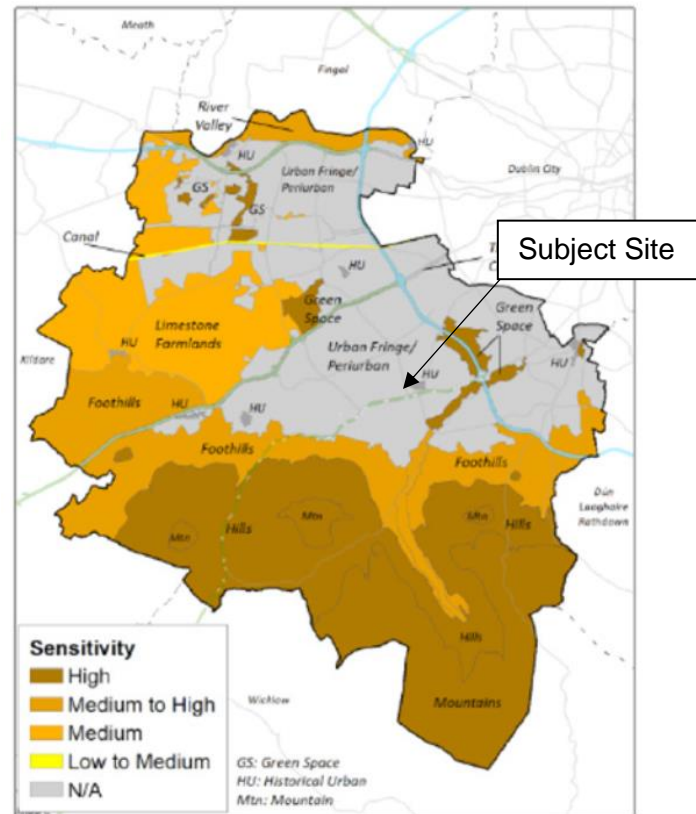


Figure 3.2: Landscape Character Types and Sensitivity for South Dublin County

- 6.71 The Design Townscape and Visual Assessment considers the vacant nature of the subject site and concludes:

'The success of the design is confirmed both the Design Quality section and, in the assessments, set out with the images of the 16 views. In each case it has been possible to be positive about the scheme, in terms of its height, massing, elevational compositions, materiality and landscaping.'

- 6.72 It is noted that there are no prospects to be preserved and protected which are relevant to the proposed development.

Policy NCBH20: Architectural Conservation Areas

NCBH20 Objective 3: *To ensure that new development, including infill development, extensions and renovation works within or adjacent to an Architectural Conservation Area (ACA) preserves or enhances the special character and visual setting of the ACA including vistas, streetscapes and roofscapes.*

NCBH20 Objective 8: *To ensure that all planning applications for new developments within or immediately contiguous to an ACA include an Architectural Impact Assessment and Design Rationale addressing design considerations such as urban structure and grain, density and mix, scale, height, materials, landscape, views and landmarks and historic development.*

- 6.73 The perimeter of the Tallaght Architectural Conservation Area including protected structures at St. Maelruan's church is located approximately 150 metres east. An Archaeology Report prepared by IAC accompanies this submission and concludes:

'Given the results of the assessment the proposed development area is considered to possess a low archaeological potential due to the likely disturbance caused by the

modern development in the site. It is probable that any archaeological remains that may have been present within the site would have been negatively impacted upon. As such, the risk of adverse impacts on the archaeological resource as a result of the development going ahead are considered to be low.'

- 6.74 The Design Townscape & Visual Assessment notes 'no effect' from St Maelruain's Church (View 8) and concludes the following in respect to views from the church graveyard within the ACA:

'The proposed development would greatly enhance the quality of this view, providing it with an attractive and skilfully composed central focus of high-quality design, and would result in a much more coherent backdrop to the graveyard and other foreground elements, enhancing the compositional value of the view in general.'

Green Infrastructure

Policy GI4: Sustainable Urban Drainage Systems

GI4 Objective 1: *To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide.*

GI4 Objective 3: *To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.*

GI4 Objective 4:

To require that all SuDS measures are completed to a taking in charge standard.

Policy GI5: Climate Resilience

GI5 Objective 7: *Require the provision of green roofs and green walls, providing benefits for biodiversity and as an integrated part of Sustainable Drainage Systems (SuDS) and Green Infrastructure, in apartment, commercial, leisure and educational buildings, wherever possible and develop an evidence base for specific green roof requirements as part of the Council's ongoing SuDs strategy development.*

- 6.75 The proposed development has been designed with SUDS in accordance with the South Dublin County Council's Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide, integrated with open space and green roofs and to taking in charge standard. Please refer to the accompanying Engineering Services Report prepared by CS Consulting for further details.
- 6.76 The development includes a new tertiary route in accordance with the LAP. Public realm improvements enhancing the existing footpaths and landscaping at the edge of the site are provided, in addition to the central courtyard of public open space which includes various aspects of landscaping, planting, play areas and seating as well as pedestrian and cycle routes through the site.

Policy GI6: Human Health and Wellbeing

GI6 Objective 4: *To ensure that all new residential development provides access to multifunctional green open space, in accordance with the provisions of Chapter 8 Community and Public Open Space of this Development Plan and South Dublin County's Parks and Open Space Strategy.*

GI6 Objective 5: *To support the provision of new walkways and cycleways in suitable locations to improve the recreational amenity of GI corridors in a manner that does not compromise the ecological functions of the corridors.*

- 6.77 The proposal provides for a mix of public, communal and private open spaces, which facilitate multi use activities in accordance with the Council's Open Space Strategy. The scheme includes a new tertiary route which bisects the southern part of the site with pedestrian and cyclist priority, as well as pedestrian and cycle paths through the central part of the development encouraging active use of the public open space and improving permeability for the wider area as part of the scheme. The edge of the site will be enhanced through increased planting and landscaping, complementing the existing green infrastructure along Blessington Road and Belgard Road.

Quality Design and Healthy Placemaking

Policy QDP1: Successful and Sustainable Neighbourhoods

QDP1 Objective 1: *To ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).*

QDP1 Objective 2: *To ensure that residential, mixed use and employment development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013 as updated).*

QDP1 Objective 3: *To protect the quality, ambiance, vibrancy and vitality of urban centres by promoting an appropriate mix of complementary and compatible day and night-time uses, including commercial, recreational, civic, cultural, leisure and residential uses.*

QDP1 Objective 4: *To reinforce the network of urban centres as the appropriate locations for new mixed-use development, ensuring that the existing context including identified built and natural assets, urban design, integration and potential for connectivity fully informs development.*

- 6.78 Compliance with the Section 28 Guidelines referenced has been set out earlier in Section 5 of this report. The accompanying DMURS Statement prepared by CS Consulting sets out compliance with the Design Manual for Urban Roads and Streets. The proposal provides a mix of uses, contributing to activity throughout the day, introducing a range of retail and commercial uses such as offices and professional services uses, cafes and restaurants which complement the residential scheme and respond positively to the site's 'town centre' zoning.

Policy QDP2: Overarching - Successful and Sustainable Neighbourhoods

QDP2 Objective 1: *To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how 'The Plan Approach' has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design proposal.*

QDP2 Objective 2: *To ensure that 'The Plan Approach' to development is taken into consideration by the applicant and demonstrated during any pre-application*

consultations (under section 247 of the Planning & Development Act, 2000, as amended).

- 6.79 Please refer to the accompanying Architectural Design Statement prepared by Henry J Lyons which has been prepared in accordance with the above objectives and has considered the 8 Design Principles which form the basis of the Plan Approach. The proposed development is subject to high quality design and finishes which has been refined following pre-application consultation with the Planning Authority and ABP and detailed in the Architectural Design Statement.

Policy QDP6: Public Realm

QDP6 Objective 1: *To require that all development proposals, whether in established areas or in new growth nodes, contribute positively to the creation of new, and the enhancement of existing public realm. To demonstrate how the highest quality in public realm design is achieved and how it can be robustly maintained over time (see also Chapter 13 Implementation and Monitoring - Design Statements and Public Realm).*

QDP6 Objective 6: *To ensure that all new developments but particularly apartment developments where gardens do not form part of the home, make provision for sufficient public realm space to enable the community to enjoy a healthy living environment outdoors but within the boundaries of the development and that no new development whether it be private or social creates a development that downgrades the public realm to an extent that it is insufficient to serve as a healthy place to live, both mentally and physically.*

Policy QDP7: High Quality Design – Street Frontage

QDP7 Objective 2:

To actively promote well-designed streets and public spaces that provide for active frontages and 'live' edges that feel safe, secure and attractive for all to use.

QDP7 Objective 3:

To require a high quality of design and finish for new and replacement shopfronts, signage, and advertising, having regard to the requirements set out in Chapter 13 Implementation and Monitoring.

QDP7 Objective 4:

To ensure that the principles of good shopfront design as set out in South Dublin County Council Shopfront Design Guidelines (2019) (or any superseding guidelines) are adhered to.

- 6.80 The proposal will enhance the public realm at the location. The development will replace a vacant site and perimeter wall with a high-quality scheme which will enhance the visual appearance of the streetscape, provide additional landscaping and planting at the edge of the site and promote public use and permeability through the lands. The proposal includes a significant area of public open space which equates to 11.3% of the site and encourages active travel through the provision of 214 visitor cycle parking spaces and cargo bike spaces. The public realm at Belgard Square East, Blessington Road and Belgard Road will benefit from retail and commercial units at ground floor level overlooking the street, providing active frontage and passive surveillance, activating the street and attracting use and footfall to the location, as well as enhancing the biodiversity of the site through an extensive landscaping and planting strategy.

- 6.81 This is complemented by 2,223 sqm of communal open space for residents in the form of a residents' garden at the southern perimeter and a series of roof terraces, providing a range of activities to enhance the quality of life for residents.
- 6.82 The proposed commercial units at ground level have been designed with glazed frontage to activate the streetscape, with associated signage to be subject to future agreement with the Planning Authority. This will ensure that the public realm benefits from an attractive and well-designed frontage.

Policy QDP7: High Quality Design – Adaptability and Inclusivity

QDP7 Objective 8:

To promote and support a Universal Design Approach to residential and non-residential development – having regard in particular to the universal design principles and guidance in relation to Buildings for Everyone, Housing and Shared Space as promoted by the Centre for Excellence in Universal Design at the National Disability Authority – ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES. (See also Chapter 8 Community Infrastructure and Open Space).

QDP7 Objective 9:

To promote and support the provision of quality housing with long-term adaptability in residential and mixed-use developments, having regard to the principles and guidance in relation to adaptability as set out in the South Dublin County's Height and Density Guide (Appendix 10) and the Urban Design Manual – A Best Practice Guide (2009) and the guidance on Lifetime Homes as set out in the Quality Housing and Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities (2007).

QDP7 Objective 10:

To promote and support the principles of universal design, ensuring that all environments are inclusive and can be used to the fullest extent possible by users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.

QDP7 Objective 11:

To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive county.

QDP7 Objective 12:

To develop a network of pedestrian footpaths and public spaces, which includes access to public toilets, accessible outdoor seating and facilities for people with disabilities and/or mobility impairments and based on the principles of universal design.

- 6.83 The proposed mixed-use development has been designed to be adaptable and universally accessible, in accordance with Part M of the Building Regulations and RPO 9.12 and 9.13 of the RSES. Residential units are of high-quality and have long-term adaptability consistent with the Quality Housing and Sustainable Communities Guidelines 2007, Appendix 10 of the draft CDP and the Urban Design Manual 2009.
- 6.84 The proposed development contains a variety of apartment types and tenures, with 1-, 2- and 3-bedroom apartments providing a mix of units and 10% provided as social housing units with the balance provided as rental units in accordance with the

Apartment Guidelines under a BTR covenant (draft submitted with this application). This adds positively to the dwelling mix and tenure in Tallaght.

- 6.85 The proposal provides an inclusive environment accessible to all users, with a central area of public open space an attractive asset for residents and visitors, with activities for those of all ages. The BTR element of the scheme includes a generous quantum of resident support facilities and amenities complemented by external communal amenity which provides for a high-quality living environment for residents which are adaptable and accessible to all.

Policy QDP8: High Quality Design – Building Height and Density Guide

QDP8 Objective 1: *To assess development proposals in accordance with the Building Height and Density Guide set out in Appendix 10 of this Development Plan and associated planning guidelines. In this regard, all medium to large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) shall be accompanied by a 'Design Statement'. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the South Dublin County's Height and Density Guide. Any departures within the proposed development from the guidance set out in the Building Height and Density Guide for South Dublin County (Appendix 10) shall be clearly highlighted in the Design Statement. (See Chapter 13 Implementation and Monitoring).*

QDP8 Objective 2: *In accordance with NPO35, SPPR1 and SPPR3, to proactively consider increased building heights on lands zoned Regeneration (Regen), Major Retail Centre (MRC), District Centre (DC), Local Centre (LC), Town Centre (TC) and New Residential (Res-N) and on sites demonstrated as having the capacity to accommodate increased densities in line with the locational criteria of Sustainable Urban Housing: Design Standards for New Apartments (2018) and the Urban Design Manual – Best Practice Guidelines (2009), where it is clearly demonstrated by means of an urban design analysis carried out in accordance with the provisions of the South Dublin County's Building Height and Density Guide that it is contextually appropriate to do so.*

- 6.86 In response to QDP8 Objective 1, a Design Statement has been prepared by HJL which includes a detailed analysis of the proposal having regard to the South Dublin County Height and Density Guide and the 12 design principles set out in the Urban Design Manual. QDP8 Objective 2 requires proactive consideration of increased building heights on Town Centre zoned lands and those which demonstrate capacity to accommodate increased densities in line with the locational criteria of the Apartment Guidelines and the SRD Guidelines. The proposed development is located at a 'central and/or accessible urban location' in the context of the Apartment Guidelines and is therefore considered appropriate for higher density development which may comprise entirely of apartments. Furthermore, the site is located within a Public Transport Corridor consistent with the SRD Guidelines and considered suitable for densities of a minimum of 50 units per hectare. The accompanying HJL Design Statement and City Designer DTVA illustrates how the development is contextually appropriate to the area and will complement and regenerate a vacant brownfield site.

Policy QDP9: High Quality Design - Building Height and Density

QDP9 Objective 1: *To require that designers and applicants demonstrate to the satisfaction of the Planning Authority that applications for landmark type buildings or for amplified heights akin to a landmark, are contextually appropriate and that the*

proportionate function of the landmark justifies it, having regard to the primary, secondary and local landmark classifications.

- 6.87 The accompanying Design Townscape & Visual Assessment prepared by City Designer addresses the above objective in respect of the 12 no. storey element of the proposed development and illustrates its contextual appropriateness. The height of the proposal is considered a secondary landmark in the context of the draft Plan Height and Density Guide and considered entirely appropriate having regard to the surrounding context and townscape, responding positively to the pattern of development and including an element of legibility to the location at the corner of Blessington Road and Belgard Road. Please refer to the City Designer document for further information.

Policy QDP10: Mix of Dwelling Types

QDP10 Objective 1: *To ensure that new residential developments provide for a wide variety of housing types, sizes and tenures in line with the South Dublin County Housing Strategy 2022-2028.*

- 6.88 The proposed development consists of 310 no. build to rent apartments, providing 99 (32%) 1-bed units, 203 (65%) 2-bed units and 8 (3%) 3-bed units which will contribute to the range and availability of rental accommodation in Tallaght, which is predominantly 3- and 4-bedroom houses at present. The proposal will add to the overall housing stock in the area and provides an alternative way of living within a high-quality and professionally managed development with significant residential amenity.
- 6.89 The proposed development contains a variety of apartment types and tenures, with 1-, 2- and 3-bedroom apartments providing a mix of units and 10% provided as social housing units with the balance provided as rental units in accordance with the Apartment Guidelines. This adds positively to the dwelling mix and tenure in Tallaght and ensures that this new residential development provides for a variety of housing types, sizes and tenures.
- 6.90 It is noted that while Section 8.3.1 of the Housing Strategy states '*development comprising residential use will be required to provide a minimum of 30% 3-bedroom units as part of the proposed scheme*', **Policy H1 Objective 13** set out in Chapter 6 of the draft Plan (as per material amendments) states that '*Build-To-Rent (BTR) residential developments shall comply with the Sustainable Urban Housing: Design Standards for New Apartments (2020) (or any superseding Section 28 Ministerial Guidelines)*'. In this respect, the proposed BTR development is consistent with SPPR8 of the Guidelines which make provision for no restriction on unit mix, as addressed above in section 5 of this report.

Policy QDP14: Local Area Plans (LAP)

QDP14 Objective 1: *To support a plan led approach through Local Area Plans in identified areas by ensuring that development complies with the specific local requirements of the Local Area Plan, having regard to the policies and objectives contained in this Development Plan and ministerial guidelines.*

- 6.91 The proposed development has been informed by the content of the Tallaght Town Centre LAP 2020. While it is considered that the proposal is consistent with the LAP, the development may constitute a material contravention of the LAP in terms of building height, plot ratio, tenure and unit mix. This is discussed in detail in the accompanying Statement of Material Contravention of the Draft South Dublin CDP 2022-2028 and the Tallaght Town Centre LAP prepared by JSA.

Housing

Policy H1: Housing Strategy and Interim Housing Needs Demand Assessment

H1 Objective 2: *To require that 20% of lands zoned for residential use, or for a mixture of residential and other uses for development of 5 or more units or development of units on land greater than 0.1 hectares (or relevant figures as may be revised by legislation) be reserved for social and affordable housing in accordance with the Affordable Housing Act 2021 and the Planning and Development Act 2000 (as amended).*

- 6.92 The above Policy H1 is taken as per the Material Amendments to the draft Plan published in March 2022. The CE Report on submissions on the Material Amendments published on 26th May 2022 do not propose any changes to the Material Amendments.
- 6.93 The proposed development includes 31 units (10%) for the purposes of social housing. This is in accordance with the provisions of the Affordable Housing Act 2021 which allows for a 10% provision where sites have been acquired by the application between September 2015 and July 2021. The subject site was purchased by the applicant in February 2021 and in this regard 10% of total units are to be provided for social housing. Please see appended letter by A&L Goodbody confirming purchase date of the site by the applicant.

H1 Objective 13: *Proposals for residential development shall provide a minimum of 30% 3-bedroom units a lesser provision may be acceptable where it can be demonstrated that:*

- *there are unique site constraints that would prevent such provision or*
- *that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA; or*
- *the scheme is a social and/or affordable housing scheme*

Note: Build-To-Rent (BTR) residential developments shall comply with the Sustainable Urban Housing: Design Standards for New Apartments (2020) (or any superseding Section 28 Ministerial Guidelines).

- 6.94 The proposal includes 32% 1-bed apartments, 65% 2-bed apartments and 3% 3-bed apartments in accordance with SPPR1 of the Apartment Guidelines and the draft Plan (as proposed to be amended) in this respect. The unit mix complies with the Sustainable Urban Housing: Design Standards for New Apartments (2020) SPPR8 which sets no restrictions on dwelling mix in BTR developments, and therefore is consistent with Policy H1 Objective 13.
- 6.95 It is noted that the above referenced Policy H1 Objective 13 is consistent with the Materials Amendments to the draft Plan published on 29th March 2022. The subsequent Chief Executive's Report on submissions made to the Material Amendments was published on 24th May 2022 and proposes no change to H1 Objective 13.

H1 Objective 14: *Support the provision of a mix of tenure types across the County in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social rental or affordable purchase and rental) within*

any local area (within a 10-minute walking distance) or Local Electoral Area, in line with the Apartment Guidelines and the provision of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.

6.96 Appendix 11 of the draft Plan includes the Housing Strategy:

'8.3.1 Housing Mix Based on the analysis set out in section 6.8 above and the supporting data, development comprising residential use will be required to provide a minimum of 30% 3-bedroom units as part of the proposed scheme. In recognition that each area has specific socio-economic differences and thus different housing demands, development proposals may justify any deviation from the minimum 3-bedroom mix, based on the socio economic and demographic context within a 10-minute walking distance from the site.'

6.97 This is consolidated by Housing Strategy and Interim HNDA (HS) Policy 1: Overarching Policies and Objectives at Appendix 11 of the draft Plan:

***HS1: Objective 16:** To ensure that a balanced mix of tenure is provided for in the areas zoned for Regeneration in the Tallaght LAP lands and the Naas Road Framework Plan area. Such a mix shall take account of the existing or permitted tenure within a ten-minute walking distance of any proposed development and applicants for planning permission shall demonstrate, to the satisfaction of the planning authority, that there is no saturation of a single tenure within the defined area.*

6.98 The proposed BTR development will support and add positively to the overall tenure of residential development in the wider Tallaght area which has a traditional housing stock of 3- and 4-bedroom dwellings. The proposed development contains a variety of apartment types and tenures, with 1-, 2- and 3-bedroom apartments providing a mix of units and 10% provided as social housing units with the balance provided as private rental units. This adds positively to the dwelling mix and tenure in Tallaght and ensures that this new residential development provides for a variety of housing types, sizes and tenures.

6.99 The proposal includes a mix of apartment types and tenures which will contribute positively to the range of dwelling types in Tallaght. The BTR apartments adds to the tenure of the local area, with just one other BTR scheme permitted within a 10-minute walk of the subject site at Glen Abbey (ABP Ref: 309916-21), confirmed by JSA assessment of the local area using the ABP and South Dublin planning application search tools. This indicates no over proliferation of BTR tenure within a 10-minute walking distance of the subject site.

- 6.100 A socio-economic assessment of a 10-minute walking band of the site (in accordance with draft Plan policy and the Housing Strategy has also been undertaken by JSA which takes in a number of small areas as per the CSO mapping tool.



Figure 10: Study Area (indicative site location shown with a star)

- 6.101 This indicates that the study area includes c. 61% of households as 'owned with mortgage or loan' or 'owned outright', with 'rented from private landlord' comprising c. 22% of the total. This demonstrates that the area has the capacity to absorb additional private rental households in order to provide a balance of tenures in the area.
- 6.102 The study area has seen a c. 13.4% increase in population to 2016, with a higher proportion of 25-44 and 65+ demographics compared to state totals, with younger adults and older down-sizers typically expected to occupy BTR developments. In this respect, the proposal is considered to respond appropriately to the emerging demographic in the study area. Statistics also demonstrate a growth in professional and managers in the area who may be suited to BTR schemes.
- 6.103 It is noted that the proposed development provides 1, 2 and 3-bedroom units, with all 2-bedroom apartments designed to accommodate 4 people, alongside 3-bed units that provide for larger family sizes. This responds to the household size in the Tallaght-Springfield Electoral Division at the 2016 Census which demonstrates a low proportion (5.1%) of 1-person households, and 3 and 4 person households (totalling c. 15%) compared to the wider study area. The proposed development will provide for additional 1-bed apartments as well as providing 4-person 2-bed units and 3-bed units which will assist in increasing the proportion of 3 and 4 person households in the area.

Policy H2: Supply of Housing

H2 Objective 3: *To promote and facilitate the development of infill schemes throughout the County where it has been identified that such schemes will contribute towards the enhancement of communities within the County subject to the protection of residential amenity ensuring that sufficient and appropriate public spaces and amenities are preserved in existing residential estates.*

H2 Objective 4: *To promote lifetime housing standards in new homes built in the County in accordance with best practice.*

- 6.104 The proposal will comprise the sustainable development of brownfield, infill lands which will activate and make optimum use of a vacant site, contributing to a high-quality streetscape and implementing public open space and an improved public realm as well as increasing permeability and amenities to the surrounding area. As set out in the accompanying Building Lifecycle Report and Design Statement, the development will be adaptable and durable and designed to a high standard.

Policy H7: Residential Design and Layout

H7 Objective 1: *To promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide and the Design Standards for New Apartments (DHLGH as updated 2020) and Chapter 13 Implementation and Monitoring.*

H7 Objective 2: *To ensure that new residential developments incorporate energy efficiency measures and promote innovation in renewable energy opportunities.*

H7 Objective 3: *To support the principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling whilst taking account of anti-social behaviour, and only progressing vehicle permeability schemes where necessary.*

H7 Objective 4: *To ensure that residential development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013).*

- 6.105 The accompanying HJL Design Statement and Housing Quality Assessment detail the high-quality residential accommodation proposed in accordance with the Apartment Guidelines and the SRD Guidelines. The proposed development incorporates energy efficient systems as set out in the accompanying Part L statement prepared by Axiseng. The proposal includes enhanced permeability through the site to that currently existing, introducing a tertiary route, cycle and pedestrian routes a generous provision of public open space. Please refer to the accompanying CS Consulting drawings and DMURS Statement for details.

Policy H8: Public Open Space

H8 Objective 1: *To ensure that public open space in new residential developments complies with the quantitative and qualitative standards set out in Section 8.7 of Chapter 8: Community Infrastructure and Public Open Space and Chapter 13: Implementation and Monitoring.*

[Section 8.7 of Chapter 8: Community Infrastructure and Public Open Space and Chapter 13: Implementation and Monitoring sets out a required Overall Standard of 2.4 ha per 1,000 population and a minimum of 10% of the site.]

H8 Objective 2: *To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development.*

Policy COS5: Parks and Public Open Space – Overarching

COS5 Objective 1: *To support a hierarchy of multi-functional, accessible parks and public open spaces across the County in line with Table 8.1, based on existing populations and planned growth in accordance with the overall standard of 2.4ha per 1,000 population.*

COS5 Objective 4: *To require the provision of public open space as part of a proposed development site area in accordance with the Public Open Space Standards (minimum) set out in Table 8.2.*

Table 8.2: Public Open Space Standards

Land Use	Public Open Space Standards (minimum)
Overall Standard	2.4 Ha per 1,000 Population
New Residential Development on Lands Zone RES-N	Minimum 15% of site area
New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area
Institutional Lands / 'Windfall' Sites	Minimum 20% of site area

COS5 Objective 5: *The Council has the discretion to accept a financial contribution in lieu of any remaining open space requirement to achieve the overall standard of 2.4 ha per 1,000 population, such contribution being held solely for the purpose of the acquisition or upgrading of small parks, local parks and neighbourhood parks subject to the open space or facilities meeting the open space 'accessibility from homes' standards for each public open space type specified in Table 8.1.*

COS5 Objective 6: *To require that public open space calculations be based on an occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.*

COS5 Objective 10: *To support and facilitate the key role of parks and open spaces in relation to green infrastructure including sustainable drainage systems (SuDS), flood management, biodiversity and carbon absorption and to promote connections between public open spaces and the wider GI network.*

COS5 Objective 19: *To support the provision within new residential developments and parks and public open spaces, of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities where appropriate, ensuring that the needs of differing age groups including young children, older children and teenagers are catered for and that different abilities and needs are accommodated to be able to access and participate in play, and to ensure play spaces and play facilities comply with universal design principles.*

COS5 Objective 20: *To ensure that children's play areas are provided as an integral part of the design and delivery of new residential and mixed-use developments and addressed as part of a landscape plan in accordance with the requirements set out in Chapter 13: Implementation and Monitoring.*

Policy H9: Private and Semi-Private Open Space

H9 Objective 1: *To ensure that all private open spaces for houses and apartments/duplexes including balconies, patios, roof gardens and rear gardens are designed in accordance with the qualitative and quantitative standards set out set out in Chapter 13 Implementation and Monitoring.*

H9 Objective 2: *To ensure that the design and layout of new apartments, or other schemes as appropriate, ensures access to high quality and integrated semi-private or communal open space that supports a range of active and passive uses.*

Policy H11: Privacy and Security

H11 Objective 1: *To ensure there is a clear definition and delineation between private, semiprivate (communal) and the public open spaces that serve residential development.*

H11 Objective 2: *To ensure that all developments are designed to provide street frontage and to maximise surveillance of streets and the public realm.*

Policy H10: Internal Residential Accommodation**H10 Objective 1:**

To promote the provision of high-quality houses and apartments/duplexes within sustainable neighbourhoods by achieving the appropriate quantitative and qualitative standards, in accordance with Ministerial Guidelines and as set out in Chapter 13 Implementation and Monitoring.

H10 Objective 2:

To support the design of adaptable residential unit layouts that can accommodate the changing needs of occupants, through extension or remodelling subject to the protection of residential amenity.

H10 Objective 3:

To strongly encourage the provision of adequate space to allow for individuals to work from home in housing units, including apartments.

- 6.106 The proposed development provides high quality public open spaces at ground level centred around the courtyard located between Blocks A and B. The proposal includes soft landscaped edges and tree lined streets to the west, north and east perimeters and includes various points of entry to the site via the tertiary route and the 'town link' which accesses Blessington Road to the north. The development has been designed to instil a sense of enclosure and place, with building heights stepping down to the centre of the scheme and providing a high-quality environment for residents and visitors with a mix of recreational, retail and commercial activity provided.
- 6.107 Nature-based children's play areas are integrated into the public open space in accordance with COS5 Objective 20. All apartments benefit from balconies designed in accordance with development standards with communal amenity space meeting required standards set out at Chapter 13 of the draft Plan. Communal open space is located to the south of Block C and across several roof terraces accessible by residents only and clearly distinguished from public open space. Street frontage to Blessington Road, Belgard Road and Belgard Square East are maximised through retail and commercial uses at ground floor level providing active frontage and interaction with the public realm.

- 6.108 A total of 1,026 sqm of public open space is provided as a Smaller Residential Open Space in accordance with Table 8.1 to equating to 11.3% of the net site area (in the ownership of the applicant) in accordance with Table 8.2 of the draft Plan. This is in accordance with the development plan requirement for New Residential Development on Lands in Other Zones including mixed use schemes. Public open space located at a central location of the site benefits from passive surveillance by commercial units and internal amenity spaces and is accessible and inclusive to all.
- 6.109 Based on a household size of 1.5 and 3.5 in accordance with COS Objective 6, the proposed development may provide a population of c. 477. Extrapolated to 1,000, the public open space provided will fall below the 2.4 ha per 1,000 population standards set out at Section 8.7 and Policy COS5 of the draft Plan. This is addressed further within the accompanying Statement of Material Contravention prepared by JSA.
- 6.110 In the event of a shortfall in public open space of one the criteria, a financial contribution can be made in lieu under the provisions of Objective COS5 Objective 5 at the discretion of the planning authority for the purpose of the acquisition or upgrading of small parks, local parks and neighbourhood parks and in exceptional circumstances to allow provision or upgrade of Regional Parks. The applicant is agreeable in principle to a financial contribution in lieu if required necessary.
- 6.111 The subject site extends to a net area of c. 0.9ha and is suitably located at a town centre location within Tallaght to provide a high-quality mixed-use development. In this respect, the required 24 sqm of public open space per person would not be possible to implement at the site. The development will benefit from good access to nearby public parks at Bancroft Park, TUD etc. which are easily accessible.
- 6.112 There is a clear definition between public, communal and private open space within the development with communal space located south of Block C and at various roof terraces, accessible by residents only, with private balcony provided at each unit in accordance with the quantitative standards set out in Chapter 13. Public and communal open space provides a range of passive and active uses. The proposal includes active frontage to the public realm at the northern, western and eastern boundaries through a commercial activity. Please refer to the accompanying Park Hood Landscape Architects Design and Access Statement for further details on the landscape strategy which incorporates sustainable drainage systems and biodiversity and carbon absorption elements.
- 6.113 Proposed apartments have been designed in accordance with the qualitative and quantitative standards set out set out in Chapter 13 Implementation and Monitoring, with coworking areas provided within the amenity spaces included in the scheme to facilitate working from home. Please refer to the accompanying HQA prepared by HJL for details, including demonstrating adaptability, further detailed in the Building Lifecycle Report by HJL.

Sustainable Movement

Policy SM1: Overarching – Transport and Movement

SM1 Objective 2: *To ensure consistency with the NTA's Transport Strategy for the Greater Dublin Area (2016-2035) and any superseding document, as required by RPO 8.4 of the RSES.*

SM1 Objective 4: *To ensure that future development is planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating*

a safe and attractive street environment for pedestrians and cyclists, in accordance with RPO 5.3 of the RSES/MASP.

Policy SM2: Walking and Cycling

SM2 Objective 3: *To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced by promoting compact growth and permeability in the design and layout of new development areas.*

SM2 Objective 5: *To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types.*

Policy SM5: Street and Road Design

SM5 Objective 2: *To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets.*

Policy SM7: Car Parking and EV Charging

SM7 Objective 9: *To ensure that car parking is designed in such a manner as to promote visual amenity, green infrastructure, carbon sequestration and sustainable drainage (SuDS) by applying the following requirements: Provision of landscaping integrated into the design of all car parking, to include planting of native trees and pollinator species; Provision of not more than two parallel or five perpendicular spaces between trees/planting bays; Use of permeable paving, where appropriate.*

SM7 Objective 10: *To ensure that parking provision, including the provision of EV charging facilities, does not detract from the comfort and safety of pedestrians and cyclists, visual amenity or the character of an area. (refer also to Chapter 10 Energy).*

- 6.114 Compliance with the Greater Dublin Area Transport Strategy 2016-2035 and draft Strategy 2022-2042 has been demonstrated above. The proposal has been designed to promote cycling and walking, providing a generous quantum of cycle parking spaces and a range of publicly accessible shared pedestrian paths and cycle routes. Enhanced access to existing cycle lanes on Belgard Road is also provided via the tertiary route bisecting the southern part of the site in accordance with the provisions of the Tallaght LAP. The subject site is located within 380m of the Tallaght Luas stop and 150m of the proposed Bus Connects Corridor 9 stop on Belgard Square North. All roads and streets have been designed in accordance with DMURS, as set out in the accompanying DMURS Statement prepared by CS Consulting.
- 6.115 The proposed car parking facilities are located at the basement level and therefore do not impact on visual amenity. In addition, the development is capable of facilitating EV charging points at basement level, with 20% of all spaces fitted with EV charging points in accordance with the draft Plan standard. Car parking at ground level is associated with the tertiary route with a set down area for the creche provided adjacent to this. Hardstanding and car parking areas have been reduced, with soft landscaping and planting prioritised within the scheme in accordance with the policies above.

Community Infrastructure and Open Space

Policy COS1: Social Inclusion and Community Development

COS1 Objective 1: *To provide appropriate and accessible community facilities to meet the needs of all citizens of the County, comprising of a fast-growing young population and including an ageing population, consistent with NPOs 28 and 30 of the NPF.*

COS1 Objective 2: *To support the implementation of the South Dublin County Local Economic and Community Plan (2016-2021 or superseding Plan) through the spatial planning policies and objectives of the County Development Plan, in collaboration with the Local Community Development Committee (LCDC), consistent with RPO 9.18 of the RSES.*

COS1 Objective 3:

To support and facilitate the implementation of local plans and programmes (and any superseding documents) with a social inclusion and community development focus including:

- *Social Inclusion and Community Activation Programme (2018-2022)*
- *South Dublin County Council Integration Strategy (2019-2023) – A More Inclusive County*
- *The South Dublin County Traveller Accommodation Programme (2019- 2024)*
- *South Dublin Disability Accommodation Strategy*
- *South Dublin Age Friendly Strategy (2020- 2024)*
- *A Strategy for a Healthy South Dublin (2019-2022)*

Policy COS2: Social/Community Infrastructure

COS2 Objective 1: *To support the provision of a wide range of community facilities and to ensure that such facilities are provided in new and existing communities in tandem with housing development, with special consideration for period of review to adapt to the needs of an increasingly multi-cultured and diverse community, in accordance with the phasing requirements of Local Area Plans and Planning Schemes.*

COS2 Objective 4: *To support the clustering of community facilities such as community centres, sports and leisure facilities, schools, childcare facilities and open spaces to create multi-purpose community hubs.*

- 6.116 The proposed development includes a 257 sqm creche, commercial units, public open space and movement and public realm infrastructure which contributes positively to the regeneration of the subject site and improve the provision of facilities for residents and the wider public in accordance with the objectives of the LAP and the site's Town Centre zoning. Open space includes a range of activities for all ages and the development seeks to be inclusive in accordance with relevant plans and programmes as well as relevant policies of the RSES as referred to in policies above.

Policy COS7: Childcare Facilities

COS7 Objective 1: *To support and facilitate the provision of childcare facilities on well located sites within or close to existing built-up areas, including adjacent to school sites, and within employment areas where the environment is appropriate, making provision to encourage sustainable transport, consistent with NPO 31 of the NPF.*

COS7 Objective 2:

To require provision of appropriate childcare facilities as an essential part of new residential developments in accordance with the provisions of the Childcare Facilities

Guidelines for Planning Authorities (2001) or any superseding guidelines, or as required by the Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places for each 75 units for new residential developments, with any variation to this standard being justified having regard to factors such as type of residential units, emerging demographic profile and availability of existing childcare services in the vicinity.

COS7 Objective 3:

To require childcare facilities to be provided in new communities in tandem with the delivery of residential development and, where a Local Area Plan or Planning Scheme applies, in accordance with the phasing requirements of that plan/scheme.

- 6.117 In response to CS07 2 and 3, the proposed development provides a 257 sqm creche facility, considered to be sufficient owing to proposed unit mix of 32% 1-bed, 65% 2-bed and 3% 3-bed apartments. In accordance with the Apartment Guidelines 2020, 1-bed units can be omitted from the requirement, equating to 211 apartments. As per the Apartment Guidelines, this exclusion may also apply, in part or whole, to units with two or more bedrooms, with a conservative proportion of 30% of 2-bed units excluded from the total, providing c. 143 units. Based on the Childcare Facilities Guidelines for Planning Authorities (2001), this may provide a demand of c. 38 arising from the development. Approximately 20% of pre-school children utilise childcare facilities, which may result in a demand of c. 8 children arising from the proposal. The proposed 257 sqm will adequately provide for this total, whilst assisting with any demand arising from the surrounding area. In this respect, the proposed facility is in accordance with COS7 Objective 2 having regard to the Apartment Guidelines which 'supersede' the Childcare Facilities Guidelines in respect of the assessment of need.
- 6.118 This is addressed above at section 5 of this report and the accompanying Social Infrastructure Assessment prepared by JSA. The Social Infrastructure Assessment indicates significant available capacity at existing childcare facilities in the area, with additional facilities currently proposed at other scheme within the area. This

Economic Development and Employment

Policy EDE4: Urban Growth, Regeneration and Placemaking

EDE4 Objective 7: *To require that employment space provided as part of new mixed-use development is suitably designed to be a viable workspace to meet the needs of a broad range of different employment types.*

EDE4 Objective 11: *To support the regeneration of the Tallaght LAP lands in a co-ordinated and sustainable manner in accordance with the Tallaght Town Centre LAP 2020 or any superseding plan whilst ensuring the lands particularly Cookstown, remain a sustainable employment area to ensure environmentally short journeys to places of employment and to ensure the residential impact of the REGEN zoning does not instigate the decline in the employment capacity and sustainability of the area.*

Policy EDE8: Retail – Overarching

Seek to ensure adequate retail provision at suitable locations in the County, having regard to the sequential approach, and protect the vitality and viability of existing centres in accordance with the retail framework provided by the Retail Planning Guidelines for Planning Authorities (2012, or any superseding guidelines) and EMRA RSES Retail Hierarchy.

EDE8 Objective 1: To have regard to the Retail Planning Guidelines for Planning Authorities, DOECLG (2012) and the EMRA RSES Retail Hierarchy (or subsequent guidance) in defining the role of retail centres and in determining planning applications for retail development.

EDE8 Objective 3: To support new retail provision in the County to meet the needs of the County's population and to direct new retail floor space into designated retail centres in accordance with the County Retail Hierarchy, so that centres can maintain and expand their retail offer.

EDE8 Objective 4: To support the viability and vitality of the existing retail centres in the County, in particular in town, village and district centres and to facilitate a competitive and healthy environment for the retail industry, while reinforcing sustainable development.

Policy EDE9: Retail - Tallaght Town Centre

Maintain and enhance the primary retailing and major town centre function of Tallaght Town Centre as a Level 2 Major Town Centre and County (Principal) Town Centres.

EDE9 Objective 1: To support the provisions of the Tallaght Town Centre Local Area Plan, (2020), or any superseding plan regarding retail and economic growth.

EDE9 Objective 5: To promote and encourage the development and redevelopment, to a high standard of urban design, of the identified Retail Opportunity Sites at, and adjacent to, the Square Shopping Centre and mixed use/retail opportunity at the former Woodies site on the Belgard Road.

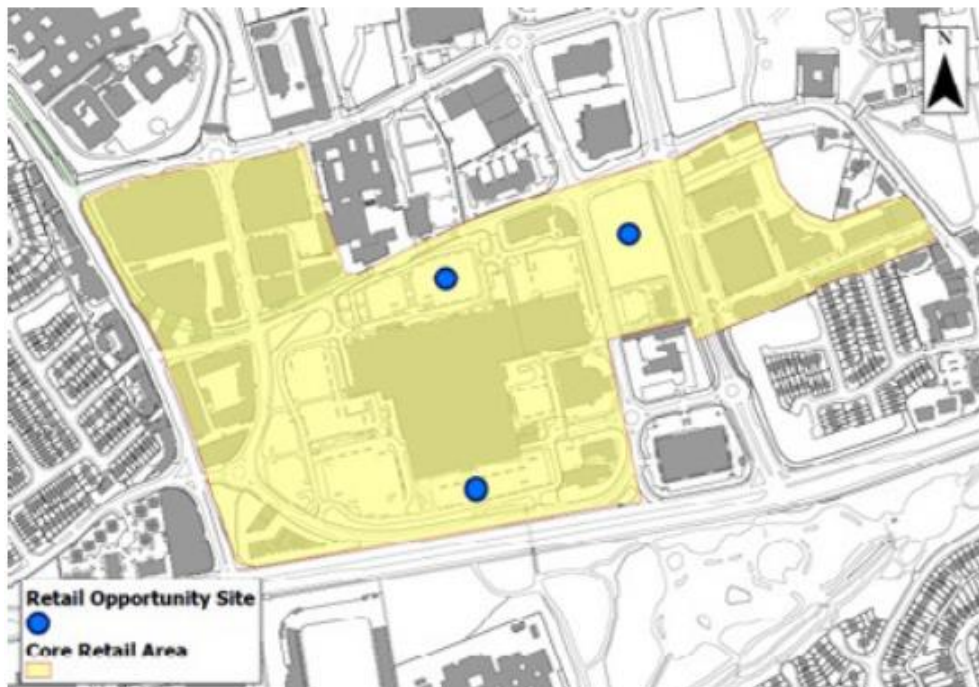


Figure 9.1: Tallaght Core Retail Area and Opportunity Sites.

6.119 The proposed development provides new retail and retail-related services in a sustainable manner, in keeping with guidelines, zoning and the site's location within the Tallaght Town Centre Area. Policy EDE9 Objective 5 seeks the 'redevelopment of Retail Opportunity Sites at... [the] mixed use/retail opportunity at the former Woodies

on the Belgard Road'. The proposed development will support and assist the regeneration of the Tallaght LAP lands in a sustainable manner and direct retail to a town centre and core retail area location.

- 6.120 The subject site is identified as an 'Retail Opportunity Site' located within the Core Retail Area of Tallaght town centre and the proposed development will directly facilitate the redevelopment of the site for a mixed-use scheme including retail. The proposal includes c. 2,289 sqm of commercial use, including c. 1,913 sqm of retail and retail-related services within a mixed-use development that comprises 310 BTR apartments. This is comprised of the following:

Retail/Commercial: 2,289 sqm

- Retail/Restaurant (609 sqm)
- Retail/Class 2 / Professional Services/Office (586 sqm)
- Retail (467 sqm)
- Retail/Café (252 sqm)
- Creche (257 sqm)
- Ancillary Space (119 sqm)

- 6.121 It is noted that the subject site is currently vacant and provides no retail space. The proposed development includes a mix of retail, café/restaurant, office/professional services and creche use at ground floor level, consistent with the mixed-use frontages required by the LAP along Belgard Square East, Blessington Road and Belgard Road, contributing positively to an active façade and animated streetscape. The commercial provision has been increased by c. 34% to that proposed at pre-application stage in direct response to the ABP and SDCC opinions. The proposals direct a significant quantum of retail floorspace within a mixed-use development at an identified retail opportunity site.

- 6.122 Tallaght Town Centre is a Level 2 Major Town Centre within the Retail Hierarchy of the GDA and the County. The Town Centre has well established and significant retail provision of over 72,000 sqm, focused on the Square Shopping Centre as the retail core. Further significant areas of additional retail have been developed over the last 20 years in the Town Centre, including at Tallaght Cross and Tallaght Central, to the northwest of The Square. As is noted in the report by Bannon Property Consultants, a number of the units in this area have remained vacant since they were developed over 12 years ago. While a Marks and Spencer store did open in part of Tallaght Cross, unfortunately it closed after a few years trading and this large unit has remained vacant for a number of years.

- 6.123 Furthermore, again as noted in the planning report, there is a planning permission for a significant extension to the Square Shopping Centre which would provide an additional c.18,000 sqm of retail space. Therefore, there is more than adequate existing and permitted retail floor space available to accommodate likely future retail demand in Tallaght Town Centre. Notwithstanding this, significant further additional retail is provided in the proposed scheme in a range of retail units and retail related services, which will complement the core retail area focused on the Square to the west of the subject site and also help form a retail link to the existing retail units to the east at Tallaght Village, and which will therefore enhance and strengthen the overall retail provision of Tallaght Town Centre, in accordance with the policies and objectives of the draft Development Plan. This retail provision in the proposed scheme will deliver on the retail opportunities this site presents in the context of the retail structure of the town centre.

- 6.124 The provision of retail and commercial uses at the proposed development has been informed by market research undertaken by Bannon Property Consultants which

accompanies this submission. This includes an assessment of the current retail provisions in Tallaght. The report estimates current vacancy of in excess of 17,000 sqm, a rate of 24% of the total stock and notes that *'based on the current vacancy and approved retail space within The Square there is a more than adequate supply currently in place to satisfy this demand'* arising from the development of various Town Centre sites for residential use.

- 6.125 The report recognises the low vacancy in The Square and *'the agglomeration of retail uses within the core can provide a successful and comprehensive range of services and facilities to the wider town centre users'* with the town centre lacking *'residents not more retail'*. Retail is considered to only be viable *'when supported by identifiable retail spend'* which is demonstrated to be lacking through a shortfall in residential uses in the Town Centre. The proposed retail uses are included in accordance with Retail Policy 2 Sequential Approach to *'guide retail development where practical and viable'* to existing town centres to ensure these are *'sustained and strengthened'* and are considered viable in this context and in this location.
- 6.126 The report considers the proposed scale and nature of the commercial uses provided within the scheme, such as financial and professional services *'may work within the subject development'* as they are *'businesses which do not fit naturally in the retail core at The Square'*, being more suited to High Street locations. There may also be scope for medical services at the location. These uses, alongside *'local coffee shops and small-scale food operators... may suit the retail offer'* with viability increased *'given the lower costs associated with service charge and rents'*. The proposed retail and associated uses are complementary to that existing in the town centre area and complementary in this regard, effectively forming a secondary high street provision which assists in linking the old and new Tallaght town centres and respond positively to the existing mix of uses whilst making provision for a mix of uses at the site. This will improve and enhance the variety of services within Tallaght, increasing the intensification of retail and assisting in achieving EDE 9 Objective 5 by the redevelopment of the former Woodies site.
- 6.127 Please refer to the accompanying document by Bannon Property Consultants (Appendix 2) for further details.

Energy

Policy E3: Energy Performance In Existing and New Buildings

E3 Objective 3: *To require all new development to be designed to take account of the impacts of climate change, and that energy efficiency, energy provision and renewable energy measures are incorporated in accordance with national building regulations and relevant policy and guidelines.*

Policy E5: Low Carbon District Heating Networks

3. Support the delivery of District Heating Proposals subject to proven feasibility within areas demonstrating heat demand density in excess of 150TJ/km² (including for the identified areas of Low Carbon District Heating Potential in Tallaght, Clonburris/Grange Castle and Clondalkin). Future developments within these areas should connect into existing or confirmed District Heating Systems. Where a District Heating scheme has not been confirmed new development should be designed so that it can connect into such a scheme when one is delivered.

- 6.128 A Part L compliance statement has been prepared by Axiseng Engineering and is submitted as part of this application, with potential solar gain optimised through the

siting, layout and modulation of the proposed development which benefits from south facing aspects. As set out in the accompanying Axiseng report, the proposed development has been designed to facilitate connection to the Tallaght district heating system, when available.

Infrastructure and Environmental Services

Policy IE2: Water Supply and Wastewater

IE2 Objective 9: *To ensure that all new developments in areas served by a public foul sewerage network connect to the public sewerage system.*

IE2 Objective 10: *To require all development proposals to provide a separate foul and surface water drainage system – where practicable.*

Policy IE3: Surface Water and Groundwater

IE3 Objective 2: *To maintain and enhance existing surface water drainage systems in the County and to require Sustainable urban Drainage Systems (SuDS) in new development in accordance with objectives set out in section 4.3.2 of this Plan including, where feasible, integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.*

Policy IE4: Flood Risk

IE4 Objective 1: *To require site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12/2014 and the EU Floods Directive.*

IE4 Objective 2: *To require all developments in the County to be designed and constructed in accordance with the “Precautionary Principle” detailed in the OPW Guidelines.*

6.129 The proposed development is located within an area served by a public foul sewerage network and provides a separate foul and surface water drainage system. SUDS features are utilised within the proposed development and include permeable paving, rain gardens, tree pits and permeable paving. Please refer to accompanying CS Consulting Engineering Services Report for details.

6.130 A Flood Risk Assessment prepared by CS Consulting is submitted with this application, carried out in accordance with the Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12/2014 and the EU Floods Directive and the Precautionary Principle. The site is not located in Flood Zone A or B as illustrated in the SFRA Green Infrastructure & Flood Map 13 of the draft Plan. Refer to CS Consulting FRA for details.

Policy IE6: Waste Management

IE6 Objective 1: *To encourage a just transition from a waste management economy to a green circular economy to enhance employment and increase the value, recovery and recirculation of resources through compliance with the provisions of the Waste Action Plan for a Circular Economy 2020 – 2025 and to promote the use of, but not limited to, reverse vending machines and deposit return schemes or similar to ensure a wider and varying ways of recycling.*

IE6 Objective 7: *To require the appropriate provision for the sustainable management of waste within all developments, ensuring it is suitably designed into the development, including the provision of facilities for the storage, separation and collection of such waste.*

- 6.131 The proposed development includes facilities for the sustainable management of waste and the storage, separation and collection of such waste. Refer to the accompanying Operational Waste Management Plan for details.

Policy IE7: Environmental Quality

IE7 Objective 5: *To ensure that future developments are designed and constructed to minimise noise disturbance and take into account the multi-functional uses of streets including movement and recreation as detailed in the Urban Design Manual (2009) and the Design Manual for Urban Roads and Streets (2013).*

IE7 Objective 6:

To ensure external lighting schemes minimise light spillage or pollution in the immediate surrounding environment and do not adversely impact on residential or visual amenity and biodiversity in the surrounding areas.

- 6.132 The proposal has been designed in accordance with the Urban Design Manual (2009) and the Design Manual for Urban Roads and Streets (2013) as set out in the accompanying HJL Design Statement and CS Consulting DMURS Statement. The public lighting scheme designed by Axiseng minimises light spillage to the immediate environment and do not adversely impact on residential or visual amenity and biodiversity in the surrounding areas. Refer to these reports for details.

Policy IE8: Casement Aerodrome

IE8 Objective 1: *To ensure the safety of military and other air traffic, present and future, to and from Casement Aerodrome with full regard for the safety of persons on the ground as well as the necessity for causing the least possible inconvenience to local communities.*

Policy IE11: Helipads

Provide protection for hospital helipads, in particular the existing helipads at Tallaght Hospital and at Hermitage Clinic, by ensuring that a 1 in 8 slope in all directions from the edge of the helipad is kept free of any new obstacles (and under any future Approach or Departure Surface which may be designated for such helipads), and by avoiding any overhead wires or masts in their vicinity.

- 6.133 The proposed development has been designed to ensure the safety of air traffic to and from Casement Aerodrome and safe access to the Tallaght Hospital Helipad. Please refer to accompanying Aviation Report prepared by O'Dwyer Jones for details.

Implementation and Monitoring

13.2.1 Landscape Character Assessment

- 6.134 The proposed development is located within the 'Urban' Landscape Character Type as set out in Chapter 13. The chapter sets out the following Principles for Development:
- *Appropriate siting and boundary treatments of new residential developments.*

- *Demonstrate through design statement /masterplan/planting plan how it relates to historic core where present.*
- *Stronger use of hedgerows and trees as a visual screening.*

6.135 The accompanying Townscape & Visual Assessment prepared by City Designer sets out how the proposed development integrates successfully with the Urban LCT.

13.2.2 Ecological Protection & 13.2.3 Appropriate Assessment

6.136 The proposed development is accompanied by an EclA and Appropriate Assessment prepared by Enviroguide in accordance with requirements of Article 6(3) of the Habitats Directive 92/43/EEC of the 21 May 1992. Conclusions of both are included above.

13.2.4 Environmental Impact Assessment

6.137 Awn have prepared an EIA Screening Report which accompanies this submission. The proposed development is located on an urban site and consists of 310 no. residential units, falling below any thresholds set out at Schedule 5, Part 2 of the Planning & Development Regulations 2001. The EIA Screening Report concludes:

'It is concluded having regard to the nature, scale and location of the subject site, that the proposed development is not likely to have significant effects on the environment (direct, indirect or cumulatively with other development) and therefore it is considered that an environmental impact assessment report is not required in this instance.'

13.2.5 Archaeological Heritage & 13.2.7 Architectural Conservation Areas

6.138 The northeast corner of the subject site is located within an 'Area of Archaeological Potential'. The perimeter Tallaght Architectural Conservation Area including protected structures at St. Maelruan's church is located approximately 150 metres east. An Archaeology Report has been prepared by IAC and accompanies this submission.

13.3.2 Green Infrastructure and Development Management & 13.3.3 Green Infrastructure Interventions

6.139 The subject site is not located within or adjacent to a GI Core, Corridor or Stepping Stone. The proposal makes provision for green infrastructure through a comprehensive landscaping plan which will significantly boost ecology and biodiversity at the site including landscaping, planting and green roofs. A Green Infrastructure Plan is included as part of the landscape design and access statement and drawings submitted by Parkhood alongside an Arboricultural Report and drawings prepared by Charles McCorkell.

13.4.1 Universal Design & 13.4.2 Design Considerations and Statements

6.140 The proposed development has been designed in accordance with Part M requirements and is inclusive to all. The accompanying Design Statement and Building Lifecycle Report illustrate compliance in this regard, as well as the adaptability of housing design and access.

6.141 The HJL Design Statement addresses contextual and urban design issues and clearly explains the design process, the design options considered and the rationale behind the adopted design development strategy. The Design Statement sets out a detailed analysis of the proposal and statement based on the 12 design criteria set out in the 'Urban Design Manual' (2009) and reflected in the South Dublin County Council's Building Height and Design Guide. This includes addressing the materials, colours and

textures utilised. The CS Consulting DMURS Statement sets out compliance in this respect and Parkhood have prepared a Design & Access Statement in accordance with 13.4.1.

13.4.3 Building Heights and Density

- 6.142 The proposal includes a contextual analysis of the South Dublin Building Heights and Density Guide as it consists of a development of increased heights and densities. Please refer to the accompanying HJL Design Statement and the City Designer Townscape & Visual Assessment for these assessments which demonstrates the positive benefits of the development and how it is contextually appropriate to the location.
- 6.143 It is noted that Section 5 of the South Dublin Building Heights and Density Guide sets out 'Indicative Development Scenarios' including infill development a Town Centre location. This example draws parallels with the subject site in terms of a site with frontage to at least two public roads, with a tertiary route provided through the site. The Guide notes the potential for 'vertical expression at north-eastern corner' by way of increased building height, with heights stepping down from this point. The development of a building height at the intersection can '*identify the gateway to the town centre area*', consistent with the subject site, with blocks broken down to accommodate the tertiary route and optimise active frontage and interface with the route and the central courtyard of public open space, enhancing permeability to the site and the surrounding area. This is further detailed within the City Designer DTVA.
- 6.144 A justification for the proposed height (considered to constitute a material contravention of the Tallaght LAP) in the context of SPPR 3 of the Urban Development and Building Height Guidelines 2018 is set out in the accompanying Statement of Material Contravention of the South Dublin CDP 2022-2028 and Tallaght LAP 2020, prepared by JSA.

13.4.4 Public Realm: (At the Site Level)

- 6.145 The proposal includes activation of the public realm at the site edges, replacing a current boundary wall with landscaped footpaths and active frontage looked upon by commercial units at ground floor level of all blocks. Extensive landscaping and planting is provided throughout the development around a central courtyard of public open space, promoting passive and active uses, sustainable modes of transport and permeability through the site.

13.4.6 Shopfront Design & 13.4.7 Signage

- 6.146 The development 10 no. commercial units including a creche at ground floor levels of each block, addressing the public realm and the central courtyard to a lesser extent. The units are incorporated into the design of the wider scheme with extensive glazed elevations at ground level to benefit passive surveillance with a high-quality material finish. Signage for each unit will be subject to further applications to the planning authority.

13.5.2 Mix of Dwelling Types

- 6.147 Section 13.5.2 sets out a unit mix requirement as follows:

Proposals for residential development shall provide a minimum of 30% 3-bedroom units unless it can be demonstrated that:

- *there are unique site constraints that would mitigate against such provision or*
- *that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA.*

- 6.148 The proposal includes 32% 1-bed apartments, 65% 2-bed apartments and 3% 3-bed apartments in accordance with SPPR1 of the Apartment Guidelines. As noted above, the proposed dwelling mix is consistent with H1 Objective 13 (as proposed to be amended) which requires BTR development to be in compliance with the Apartment Guidelines, SPPR8 of the Guidelines set out no restrictions on dwelling mix.
- 6.149 An assessment of 10-minute walking distance of the site (based on the South Dublin and An Bord Pleanála planning portals) notes a single BTR scheme permitted at Glen Abbey, with the proposed development considered to respond to and meet a specific housing need which will add positively to the housing mix in the area. In this respect, the lesser provision of 3-bedroom units within the scheme is considered acceptable. The site is suitably located to accommodate build to rent apartments having regard to the predominant family type dwellings in the older parts of Tallaght and the provision of traditional apartments in Tallaght town centre. This is further detailed in Policy H1 Objective 13 above at section 6.93 to 6.102 of this report.
- 6.150 Section 5.2.3 proceeds to set out further requirements in relation to unit mix. In response to these, a Housing Quality Assessment has been prepared by Henry J Lyons Architects demonstrating a detailed breakdown of units proposed and compliance with minimum standards and mix provided for in the Apartment Guidelines 2020 as they relate to Build to Rent development. HJL has also prepared a Building Lifecycle Report and Design Statement which details how the scheme is adaptable and universally accessible under Part M of the Building Regulations. Please refer to these documents and the accompanying Statement of Material Contravention of draft South Dublin CDP 2022-2028 and Tallaght LAP 2020 for further information.

13.5.3 Unit Tenure

- 6.151 Section 13.5.3 states the Council's support for the provision of a mix of tenure types across the County in creating suitable accommodation for all and will discourage undue segregation and over proliferation of a single tenure within any local area (10-minute walk of the proposed development) in line with the provisions of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.
- 6.152 The proposed BTR development will add positively to the overall tenure of residential development in the wider Tallaght area which has a traditional housing stock of 3- and 4-bedroom dwellings. As noted above, the proposed development includes a mix of tenure comprising 10% social housing and the balance as private rental accommodation in a mix of 1, 2 and 3-bedroom apartments. JSA has undertaken a study of the local area (10-minute walk of the proposed development), with a single BTR scheme permitted within the area. In this respect, the proposal is compliant with the draft CDP and would not result in an over proliferation of BTR units in the area.

3.5.4 Residential Standards

Apartments & Apartment Size Safeguards

- 6.153 The proposal has been designed in compliance with the following Guidelines as set out above in section 5 of this report:

- Quality Housing for Sustainable Communities Guidelines, DEHLG (2007)
 - The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009)
 - Sustainable Urban Housing: Design Standards for New Apartments (2020)
- 6.154 Please refer to the HJL HQA for further details, which also demonstrates compliance with minimum standards for apartments set out under Section 13.5.4 of Chapter 13 of the draft Plan. Approximately 38% of the proposed apartments exceed the minimum floor areas by a minimum of 10% in accordance with SPPR8 of the Apartment Guidelines 2020 in relation to build to rent development, with all apartments complying with the Specific Planning Policy Requirements (SPPRs) and Appendix 1 of the Apartment Guidelines. This is demonstrated above in Section 5 of this report. There are no 3-person, 2-bedroom apartments proposed.
- 6.155 In respect of minimum standards, these are set out in Table 3.21 of the draft Plan, replicating the Apartment Guidelines in this respect.

Table 3.21: Minimum Standards for Apartments

Type of Unit	Apartment	Private Open Space	Communal Open Space	Storage
Studio	37 sq.m	4 sq.m	4 sq.m	3 sq.m
One bedroom	45 sq.m	5 sq.m	5 sq.m	3 sq.m
Two bedrooms (3 person)	63 sq.m	6 sq.m	6 sq.m	5 sq.m
Two Bedrooms (4 person)	73 sq.m	7 sq.m	7 sq.m	6 sq.m
Three bedrooms (5 person)	90 sq.m	9 sq.m	9 sq.m	9 sq.m

Private Space, Communal / Semi-Private Space, Internal Storage Standards

- 6.156 Private open space, communal open space and storage is provided in accordance with the requirements set out within Table 3.21 above. All apartments are provided within private space in the form of a balcony (depth of at least 1.5m) which has been located to optimise solar orientation and minimise overshadowing and overlooking. Areas below balconies will remain under control of the development. There is no private space at ground floor level.
- 6.157 In respect of communal open spaces proposed, these are fully screened from public view and accessible by residents only. Communal open spaces are provided in the form of communal garden south of Block C and a series of roof terraces across each of the blocks. All communal spaces benefit from good access to sunlight and add positively to the residential amenity of the scheme.
- 6.158 Internal storage spaces are provided in accordance with the standards in Table 3.21 within each apartment.
- 6.159 Please refer to the accompanying HQA for details.

Floor to Ceiling Height

- 6.160 Floor to ceiling heights are a minimum of 2.7 metres in accordance with the draft Plan and SPRR5 of the Apartment Guidelines.

Lift and Stair Cores

- 6.161 Fewer than 12 apartments per floor per core are provided in the proposed development in accordance with the draft Plan and SPPR6 of the Apartment Guidelines.

Separation Distances and Block Layout

- 6.162 The proposed development includes adequate separation distances between Blocks A and B in excess of 22 metres in accordance with the draft Plan. Separation distances between Block A and B with Block C fall below 22 metres at gable ends. It is noted that windows on gable ends of Blocks A and B are obscured and therefore any overlooking elements are negated through design. A daylight report prepared by BPG3 demonstrates that all units in Block C achieve recommended target values for Average Daylight Factor in accordance with the draft Plan. The site is located within a town centre and therefore such separation distances are not achievable with compromising objectives for compact urban growth in accordance with the draft Plan.
- 6.163 The Board may consider the separation distances between Block C and Blocks A & B to constitute a material contravention of the draft CDP. Please refer to the accompanying Material Contravention Statement of the draft South Dublin CDP 2022-2028 and Tallaght LAP 2020 for details.

Privacy and Security Considerations

- 6.164 The proposal overlooks the public realm and benefits from a lighting scheme which assists safe access. Entrance points are well lit and benefit from surveillance from adjoining dwellings, with all apartments at first floor level and above. Please refer to the accompanying Part L Planning Report and Lighting Plan prepared by Axiseng.

Dual Aspect

- 6.165 Notwithstanding the site's 'central and accessible urban location' which requires a minimum of 33% dual aspect units, the proposal includes 48% dual aspect units. The majority of single aspect units are south, east or west facing, with a small quantum (2.9%) of north facing single aspect units located at Block C overlooking the central courtyard of public open space and considered acceptable in the context of the draft Plan which makes provision for north facing single aspect units where these overlook an area of amenity.

Sunlight / Daylight

- 6.166 A Sunlight / Daylight Report prepared by BPG3 accompanies the application and has been guided by the quantitative performance approaches and recommendations under the 'Site Layout Planning for Daylight and Sunlight' (2nd edition): A Guideline to Good Practice (BRE 2011) and BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.
- 6.167 The proposed development achieves a high level of compliance (89%) with the targeted values for ADF within the scheme with assessment undertaken in respect of the 2% target for open plan living/kitchen/dining spaces, as well as in respect of the 1.5% target for living rooms and 1% for bedrooms in accordance with BS 8206-2. Please refer to the accompanying report (2 of 3) by BPG3 for further details.

- 6.168 The assessment concludes that the proposed development, in compensation for units which do not achieve the target values ADF targets, provides for an over provision (when compared to the minimum standards) of communal open space. A significant provision of tenant amenities and services are also provided. An assessment of sunlight to amenity spaces has been undertaken, with 83% of all external amenity spaces achieving at least 2 hours of sunlight on 21st March in accordance with BRE Guideline recommendations, with neighbouring amenity space, with neighbouring amenity space achieving 85%.
- 6.169 Please refer to pages 12, 60 and 65 of the BPG3 Daylight Adequacy Report (2of 3) for further details on compensatory measures in terms of daylight and sunlight.
- 6.170 In terms of neighbouring VSC, the BPG3 report (1 of 3) found that 99 of 104 windows tested were found to retain skylight access levels. Where adjacent properties fall short of recommended targets, compensatory measures are provided at page 21 of the report:
- *A residential offer which will help to address housing shortages in the immediate neighbourhood.*
 - *The provision of additional public amenity space in the immediate neighbourhood.*
 - *Improved street frontage and concomitant passive supervision along public roads and footpaths.*
- 6.171 The development will also provide an enhanced public realm, sustainable mobility options, social infrastructure (creche), commercial/retail and café/restaurant uses and significant public open space at the central courtyard are provided, as well as the regeneration and renewal of the subject site which will implement community and green infrastructure and enhanced permeability through the site.
- 6.172 The proposed development has also been assessed pursuant to daylight standard EN17037 for completeness (BPG3 report 3 of 3), even though there is no express requirement to do so in the Apartment Guidelines, Building Height Guidelines or any other planning guidelines. The BPG3 report 3 notes good levels of compliance under this non-mandatory standard. With respect to any compliance shortfall against this new standard, we note high compliance under the existing daylight standards cited in the Apartment Guidelines or Building Height Guidelines. Compensatory measures are set out at pages 13 and 14 of the BPG3 Report 3 of 3. Finally, we note that all units are provided with a balcony, generous public and communal open space provision, improvement to the streetscape and the overall high quality of the development.

Access Cores and Communal Areas

- 6.173 The development minimises shared entrances. Residential units are not provided at ground floor level therefore own door access is not applicable here.

Clothes Drying Facilities

- 6.174 Each apartment is generously sized and benefits from a balcony, providing adequately for clothes drying.

Building Lifecycle Report and Management Companies

- 6.175 The application is accompanied by a Building Lifecycle Report prepared by HJL in accordance with the Sustainable Urban Housing: Design Standards for New Apartments (2020).

Building Design

- 6.176 The proposed development incorporates sustainable technologies as set out in the Part L compliance statement prepared by Axiseng. The proposal includes sedum roofs which contributes positively to the environment and visual amenity.

13.5.5 Build-to-Rent / Shared Living Accommodation

- 6.177 As set out above in section 5 of this report, the proposed BTR scheme is in compliance with SPPR7 and SPPR8 of the Apartment Guidelines as required under Chapter 13 of the draft Plan.

13.5.8 Residential Consolidation

Infill Sites

- 6.178 The proposal has been designed in accordance with the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities DEHLG, 2009 and the companion Urban Design Manual and provides a detailed site analysis as set out in the HJL Design Statement. The proposal will not have any adverse impacts on amenity of existing residential developments as set out in the daylight / sunlight report prepared by BPG3. The application is also accompanied by a Design Statement prepared by Henry J Lyons Architects which includes site analysis and a Design Townscape & Visual Assessment prepared by City Designer which provides an assessment of the development taking account of its local context.
- 6.179 As noted above, the proposal has been designed to ensure that existing and proposed residential amenity is not adversely impact as a result of the development. This has been guided by assessment and recommendations under r the ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition): A Guidelines to Good Practice (BRE 2011) and BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’. and/or any updated guidance. Please refer to the accompanying BPG3 reports for details.
- 6.180 Public open is provided equating to c. 11% of the net site area under the ownership of the applicant in accordance with Section 8.7.4 of Chapter 8 of the draft Plan. The applicant is agreeable in principle to any contribution in lieu where any shortfall in public open space is determined.

13.5.11 Public Open Space

Quality of Public Open Space Provision & Children’s Play Areas

- 6.181 The proposed quantum of public open space is addressed above in relation to Chapter 8, Section 8.7 Parks and Public Open space.
- 6.182 The public open space included incorporates a range of formal and informal spaces for amenity and recreation, as well as play. The proposal includes Children’s Play Areas in the form of nature-base play as part of a high-quality and safe landscaping strategy at the site which is accessible to all. Planting and landscaping, as well as green roofs, contribute positively to the biodiversity and green infrastructure at the

location, significantly improving the natural features at the site in comparison to its current condition. Public open space benefits from passive surveillance by ground floor residential amenity and retail/ commercial units.

13.6.1 Early Childhood Care and Education Facilities

6.183 This section is stated as follows:

'Applications for childcare facilities should be assessed with regard to the requirements of the 'Childcare Facilities: Guidelines for Planning Authorities', DEHLG (2001) and Circular Letter PL 3/2016 (DECLG), 2016) and any superseding guidelines, or as required by the Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places for each 75 units for new residential developments, with any variation to this standard being justified having regard to factors such as:

- *Type of residential units (e.g. if mainly one-bedroom units, childcare need may be reduced);*
- *Emerging demographic profile; and*
- *Availability of existing childcare services in the vicinity.*

In new developments, childcare facilities should be purpose built, at ground floor level or in a stand-alone building. In residential areas the conversion of detached and semi-detached dwellings will be considered at appropriate locations, subject to the protection of residential amenity. The applicant will also be required to demonstrate a spatial rationale for the conversion of a full dwelling in the context of the availability of alternative sites within the catchment, the location of schools and employment, available public transport and existing childcare facilities. In instances of partial conversion from residential to childcare, the proposal will be assessed as a HomeBased Economic Activity.'

6.184 It is noted that the Apartment Guidelines 2020 are considered 'superseding guidelines' in the context of the above. The Apartment Guidelines set out the following text in relation to childcare provision which should be read in tandem with the CDP policy in this regard:

'Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole to units with two or more bedrooms'.

6.185 A Social Infrastructure Assessment has been prepared as part of this application. The overall proposed development provides for 310 no. residential units. However, the 1-bedroom units are discounted when calculating the childcare provision, as provided for by the 2020 Apartment Guidelines. This exclusion may also apply, in part or whole, to units with two or more bedrooms. As such, a conservative proportion of the two-bedroom units within the proposed development (30%) have also been excluded from the calculation of likely demand generation. This is to reflect that a number of the two-bedroom units may be occupied by single people or couples without children. Thus,

the total number of units in the scheme which have been included in relation to the requirements for an additional childcare facility amounts to c. 143 no. units.

- 6.186 Based on the recommended provision of 20 no. childcare places for every 75 no. units, it is calculated the proposed development may generate the need for c. 38 no. childcare places. The proposed 257 sqm creche is considered to cater for c. 40 childcare places and sufficient to cater for the estimated demand arising from the development.
- 6.187 The development includes a 257 sqm creche with a 157 sqm external play area at Block C with set down area adjacent. The creche is considered appropriately scaled to cater for the anticipated demand arising from the development as detailed above.
- 6.188 The proposed creche has been sized to cater for c. 40 children and c. 10 staff, providing full day care, sessional, after school facilities, operating from 7.30am to 6.30pm every weekday. The creche is located at the western part of Block C immediately adjacent to the new access from Belgard Square East, with a set down car parking area provided at the location to limit vehicular movement through the development and minimise noise and disturbance to residential amenity. The creche is generously sized with an external area of 157 sqm. The facility is accessible, located c. 380 metres from the Tallaght Luas stop and c. 150 metres from the bus stop on Bus Connects Corridor 9, as well as proximate to Tallaght town centre, Tallaght Hospital and TU Dublin. The proposal is considered compliant with the draft Plan in this respect.

13.8.1 Bicycle Parking/Storage Standards

- 6.189 Table 13.24 sets out Minimum Bicycle Parking/Storage rates for all new development in the County, with relevant provision set out below.

Table 13.24: Minimum Bicycle Parking/Storage Rates

Category	Land-Use	Long Term	Short Stay
Accommodation	Hotel ¹	1 per 5 staff	1 per 10 bedrooms
	Nursing Home	1 per 5 staff	1 per 10 residents
	Residential Apartment	1 per bedroom	1 per two apartments
	Student Accommodation	1 per bedroom	1 per 5 bedrooms
Retail and Retail Service	Café Restaurant	1 per 5 staff	1 per 10 seats
	Bar Club ²	1 per 5 staff	1 per 150 sqm GFA
	Retail Convenience	1 per 5 staff	1 per 50 sqm GFA
	Retail Comparison	1 per 5 staff	1 per 50 sqm GFA
	Retail Warehousing	1 per 5 staff	1 per 100 sqm GFA
	Vehicle Service Station	1 per 5 staff	-
Enterprise and Employment	Offices ³ Manufacturing	1 per 200 sqm GFA	1 per 200 sqm GFA
	Warehousing	1 per 200 sqm	-
	Clubhouse Gymnasium ⁴	1 per 5 staff	1 per 50 sqm GFA
	Courts Pitches	1 per 5 staff	4 per pitch or court
	Golf or Pitch and Putt Courses	1 per 5 staff	-
Education	College of Higher Education	1 per 5 staff 1 per 2 students	-
	Crèche	1 per 5 staff	1 per 10 children
	Primary Schools	1 per 5 staff 1 per 5 students	-
	Post Primary Schools	1 per 5 staff 1 per 5 students	-

6.190 The proposed development includes 763 cycle parking spaces, with 529 secure spaces for residential use at basement level (503 at basement and 26 at ground level), 20 secure staff spaces for commercial uses located at basement level and 214 visitor spaces (50% covered) at ground level adjacent to commercial spaces and public open space, comprising 159 residential short stay and 55 commercial short stay spaces. This provision has been increased to that proposed at pre-application stage and exceeds the minimum requirement of 727 spaces as set out at Table 13.24. This is complemented by 8 cargo bike spaces and 6 motorcycle spaces provided across the development.

6.191 All cycle parking has been designed in accordance with the requirements of the National Cycle Manual, NTA (2011) and the Apartment Guidelines, with secure parking provided in combination with covered and cargo bike spaces, encouraging sustainable modes of travel at the development.

13.8.2 Car Parking Standards

- 6.192 The subject site is located in Zone 2 (Residential) within 400 metres of Tallaght Luas stop.

Table 13.26: Maximum Parking Rates (Residential Development)

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 spaces	1 space
	3 Bed+	1.5 spaces	1.25 spaces

- 6.193 The proposed development includes a total of 130 car parking spaces at basement level and 1 disabled access space at the tertiary route at ground level. A total of 8 car club spaces are provided at basement level as part of the overall provision. Based on Table 13.26, a total of c. 287 car parking spaces may be required, with additional parking required for commercial uses as set out in Table 13.25 of the draft Plan.
- 6.194 Page 582 of the draft Plan notes that ‘maximum provision should not be viewed as a target and a lower rate of parking may be acceptable’ subject to a number of criteria including the proximity of the site to public transport, services, employment and the ability of the surrounding road network to cater for increased traffic, amongst others. This has been addressed above in this report at sections 2.3 and 6.46.
- 6.195 It is noted that car parking provision of the draft Plan sets out ‘Maximum Parking Rates’ and therefore the proposed provision, owing to the site’s highly accessible location in the context of Tallaght town centre, surrounding areas of employment and facilities as well as proximity to Tallaght Luas stop and existing and proposed high frequency bus services, is entirely appropriate to the development. This has been subject to discussion with South Dublin roads department prior to lodgement of the application, who are agreeable in principle to the proposed provision. In this respect, parking provision is suitable and compliant with the draft Plan. Please refer to the Traffic & Transport Assessment prepared by CS Consulting for more details. This has been prepared in accordance with Section 13.8.5: Traffic and Transport Assessments.

13.8.3 Car Parking/Charging for Electric Vehicles (EVs)

- 6.196 A total of 20% of all car parking spaces are provided with EV charging points in accordance with the draft Plan requirements (20%), with necessary ducting installed for all car parking spaces at basement level in accordance with the provisions of the draft Plan. EV charging points are located immediately adjacent to car parking spaces at basement level and do not obstruct walking or cycle routes. EV charging will be available via a provided e.g. ESB or other, with payment stations provided facilitating payment for charging by card. Please see enclosed CS Consulting TTA for further details. A small provision of surface level car parking is included mainly consisting of temporary set down and drop off areas, as well as 1 no. disabled access space. Surface parking is located logically to ensure safe use and benefits from passive surveillance and to avoid anti-social behaviour.

13.9.1 Water Management

- 6.197 A Flood Risk Assessment has been prepared by CS Consulting in accordance with the draft Plan and relevant Guidelines set out at Section 13.9.1. The proposal includes SUDS features as detailed in the Engineering Services Report prepared by CS Consulting.

13.9.3 Environmental Hazard Management

- 6.198 The proposal includes a Lighting Plan and report prepared by Axiseng undertaken in accordance with the draft Plan. An Environmental Impact Assessment Screening Report is also submitted prepared by AWN Consulting which has regard to air quality and noise.

13.9.4 Waste Management

- 6.199 Please refer to Operational Waste Management Plan prepared by AWN Consulting and Construction & Demolition Waste Management Plan prepared by CS Consulting which have been prepared in accordance with the requirements of the Plan.

13.9.5 Aviation, Airports and Aerodromes

- 6.200 The proposal has had consideration of the Casement Aerodrome and helipad at Tallaght Hospital in its design and layout. An Aeronautical Assessment has been prepared by O'Dwyer Jones and accompanies this submission. Architectural elevation drawings include OD dimensions as well as above ground level measurements for information. Please refer to the O'Dwyer Jones report for further details.

13.10.1 Energy Performance in New Buildings

- 6.201 An Energy Efficiency and Climate Change Adaptation Design Statement has been prepared by Axiseng and accompanies this application. The report has been prepared in accordance with relevant Part L regulations.

13.10.2 Low Carbon District Heating Networks

- 6.202 In accordance with the draft Plan, the proposed development supports the delivery of District Heating Proposals in Tallaght and can facilitate connection to such a system if available at time of construction. Axiseng have engaged with the district heating system operator in preparation for this submission. Please refer to the Energy Efficiency and Climate Change Adaptation Design Statement for further details.

7.0 LOCAL PLANNING POLICY – TALLAGHT TOWN CENTRE LOCAL AREA PLAN 2020

Zoning:

- 7.1 The subject site is zoned "*Town Centre - To protect, improve and provide for the future development of Town Centres*" in both the Development Plan and Local Area Plan. The proposal includes a mix of retail and commercial floor space (2,289 sqm) at ground and first floor level and 310 no. BTR residential units.

- 7.2 **Comment:** It is submitted that the proposal will regenerate the site as per the zoning objective, providing active ground floor uses and enhancing the public domain through tree planting adjacent to the site and public permeability through the site, promoting sustainable modes of travel. The proposed design will encourage pedestrian activity within the site and create active and attractive frontages on Belgard Road, Belgard Square East and Blessington Road in accordance with the provisions of the LAP. This will be a significant improvement in comparison to the existing condition of the site which is bound by a 2-metre wall offering no integration with the public realm.

Mixed Use:

7.3 The LAP aims to include “*mixed-use frontages*” on Belgard Road and Belgard Square East as set out in Figure 3.2 of the Plan.

7.4 **Comment:** The proposed development includes mixed use ground floor frontages to the public realm across the site.

The Centre Neighbourhood:

7.5 The LAP classifies the subject site within The Centre Neighbourhood, summarised as follows:

“Continued transformation towards a high quality mixed use urban centre of city scale and character, with a vibrant mixed use residential community continuing to emerge in an attractive network of streets.”

7.6 The following is stated as the appropriate Land Use Mix/ Urban Function

“A broad mix of uses in accordance with zoning objectives in the County Development Plan”.

7.7 The relevant ‘Key Objectives’ for the subject site are addressed as follows:

TC1: *Continue the transformation of the centre with an increase in existing residential, commercial, retail, civic, services and cultural uses and functions.*

7.8 **Response:** The proposed development seeks to regenerate vacant, brownfield lands at a central, infill location to provide a mixed-use scheme including retail and commercial and public open space at street level and 310 no. BTR residential units at upper floor levels. The proposal will mark a gateway moving west towards Tallaght town centre and will encourage footfall and permeability through the site by sustainable modes of travel, whilst providing a range of facilities and amenities for residents as well as community and social infrastructure in the form of high quality public open space and a creche.

TC3: *Improve urban legibility throughout the area by providing new local streets including an extension to Airtown Road to Cookstown Road; and Cookstown Road to Belgard North; and a new connection from Belgard North to Tallaght Square*

TC4: *Improve the condition of existing streets to encourage walking and cycling.*

TC11: *Improve connectivity to all surrounding areas.*

7.9 **Response:** The proposal includes enhanced public realm at the northern, western and eastern perimeters through a comprehensive and high-quality landscaping strategy which will attract users to the site by foot or bicycle. The development includes a tertiary route through the southern part of the site in accordance with the LAP, with a focus on sustainable modes of travel through the site. This is consolidated by a ‘town link’ to the northern elevation at Blessington Road through the public open space at the centre of the site. The development benefits from a simple, legible layout which prioritises pedestrian and cycle movement and limits vehicular movements, with several access points to the site from the public realm.

TC6: *Facilitate economic development, employment generation and provide an Innovation Centre which supports small business and accommodates growth and future success of local businesses.*

- 7.10 **Response:** The proposed development includes 2,289 sqm of retail and commercial use including café/restaurant, retail/commercial/office and creche use which will facilitate economic development and employment creation in the area, consistent with the town centre zoning of the site.

TC7: Improve interface with all existing and proposed routes and open spaces.

TC10: Improve and enhance the public realm.

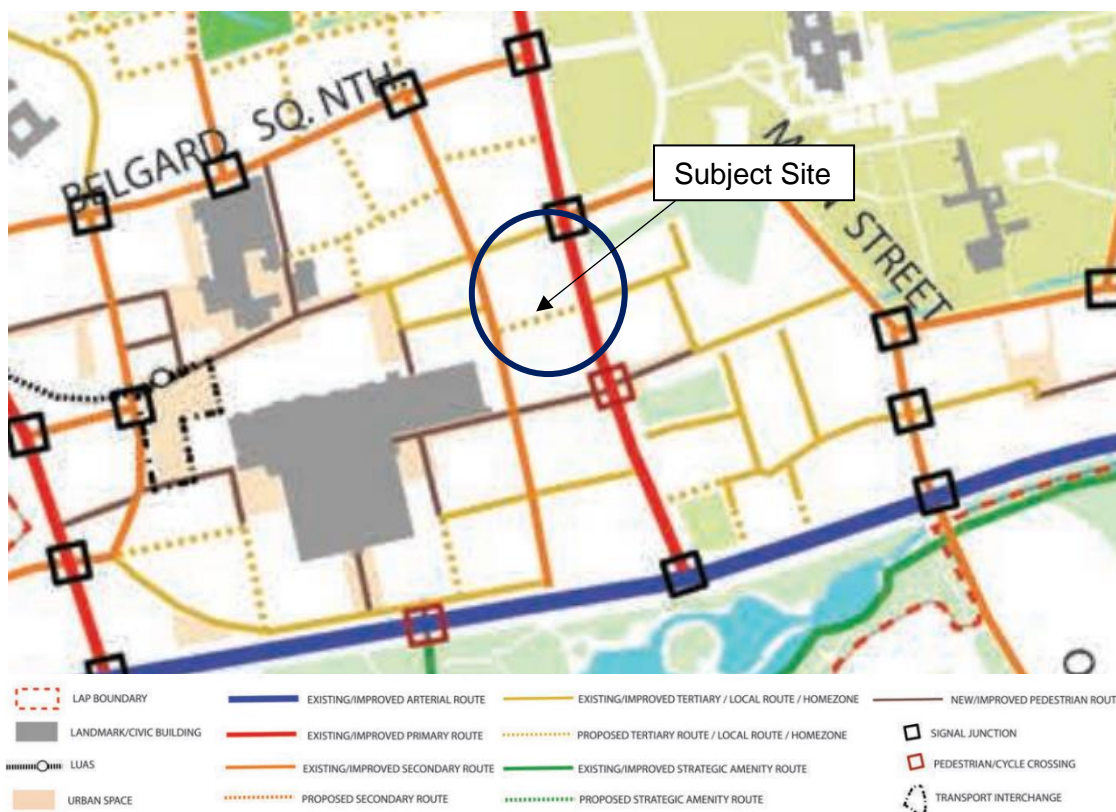
- 7.11 **Response:** The development will enhance the site's interface with the primary route of Belgard Road and the secondary route of Belgard Square East whilst promoting cycling and pedestrian activity and promoting use of existing and proposed cycle lanes. The proposal will also contribute to the creation of new green corridors at the northern, western and eastern perimeters in accordance with the LAP, whilst ensuring the central area of public open space benefits from passive surveillance by adjacent buildings.

- 7.12 The proposed development will enhance the quality of the public realm by the implementation of green edges and landscaped buffers at site perimeters, incorporating high quality landscaping and bicycle parking adjacent to commercial uses. This will attract footfall and improve the appearance of the public realm to that currently existing and provide passive surveillance and active use.

Street Network & Route Structure

- 7.13 Figure 2.1 of the LAP includes the requirement for a 'Proposed Tertiary Route/Local Route/Homezone' through the southern part of the subject site. An extract of this is shown below, with the indicative location of the site circled.

Figure 8 - Extract from the Tallaght LAP showing the site circled in blue



- 7.14 **Comment:** The proposed development includes a tertiary route through the southern part of the site which provides a link between the primary street at Belgard Road to the

east and the secondary route at Belgard Square East to the west in accordance with the LAP. The proposed route has been designed to facilitate access by service and emergency vehicles only, promoting cycling and pedestrian routes through the site and enhancing permeability. The proposed development therefore complies with this provision of the LAP. Please refer to the accompanying engineering drawings and reports by CS Consulting for further details. The proposed approach to the provision of the tertiary route has been subject to discussion with SDCC Roads Department in April 2022, with agreement in principle established for the route.

Cycling:

- 7.15 *It is an objective of the LAP to provide cycle and pedestrian routes which facilitate ease of access across the N81 between the Town Centre and Sean Walsh Park, surrounding residential areas, The Stadium and ultimately the Dublin Mountains. Alternative options to be assessed, including the provision of a land bridge, subject to a detailed traffic study and subject to agreement of Transport Infrastructure Ireland, National Transport Authority and landowners, where relevant (Objective AM1).*
- 7.16 *It is an objective of the LAP to encourage the principle of filtered permeability at suitable locations throughout the LAP area (Objective AM2).*
- 7.17 **Comment:** Figure 2.2 of the LAP includes 'new/improved' cycle routes along the northern, eastern and western perimeters of the subject site. The proposed development provides a landscaped edge to the public realm and a tertiary route through the southern part of the site which will promote sustainable forms of travel and will make provision for and respect the location of future cycle lanes. The proposal includes 763 bicycle parking spaces for residential and commercial use and will encourage use of the existing cycle lane on Belgard Road by the provision of the tertiary route through the site which prioritises pedestrians and cyclists.

Building Height:

- 7.18 The height outlined for the subject site within the LAP is 4-6 storeys at the western and southern boundaries and 6-7 storeys at the eastern and northern boundaries for residential development (Figure 2.8- Height Strategy).
- 7.19 **Comment:** The proposed development would act as a distinctive new, high quality addition to the townscape, adding architectural variety and visual interest to the otherwise somewhat monotone built environment that occupies the existing context. The building's scale is sensitively accommodated through a series of stepped roof terraces, which sees the development increase in height moving north in a gradual, considered manner. This provides excellent light access to the external public and communal amenity spaces within the development including roof terraces and external open space along the southern perimeter. The proposal includes planting at site edges and at roof terraces and balconies, as well as providing a landscaped buffer at the southern perimeter, integrating with the streetscape and public realm whilst maintaining privacy for residents.
- 7.20 As a prominent and unique piece of high-quality architecture, the proposed development will improve legibility at the corner of Blessington Road and Belgard Road, complementing existing 6-7 storey developments to the east and west and providing a distinct character to the area at a key junction location which serves as a gateway to Tallaght town centre extending to the west.
- 7.21 The proposed height of the building, between 6 and 12 storeys, respects the amenity of surrounding properties with appropriate building lines setback from the site

perimeters contributing to adequate separation distances between neighbouring sites and existing buildings. The height while greater than the LAP height provisions is therefore considered acceptable at this location due to its design and unique character which makes optimum use of this vacant brownfield site in accordance with national policy. This is further examined in the Statement of Material Contravention that has been included in this submission.

Housing:

- 7.22 The lands within the Local Area Plan for Tallaght have the potential to accommodate a maximum of up to 11,090 new homes over long term regeneration with a future residential population of nearly 34,000. The subject site will provide 310 new homes as part of these 11,090 units.

Plot Ratio:

- 7.23 The plot ratio set out for the subject site is within the 'centre' neighbourhood set out at Table 2.0 is 1.5 to 2.0.
- 7.24 **Comment:** The proposed ratio is 3.4 and therefore exceeds the LAP requirements. The site is located in a town centre with access to high quality public transport and a wide range of local services and facilities. We refer to the accompanying Material Contravention Statement in this regard.

Part V:

*It is policy of the Council to apply a 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended) to all sites in the Plan area that are solely for residential use or for a mixture of residential and other uses (save where the development qualifies for a modified or amended obligation or is otherwise exempted), to ensure an appropriate distribution of new social housing and to avoid an excessive concentration of social housing (**Objective RE 6**).*

- 7.25 **Comment:** The proposed development provides this through 31 no. Part V units. The layout and details of these units are provided in the Part V letter and costings.

Community:

*It is the policy of the Council to promote Tallaght as the priority location for regional level community and social infrastructure in the County. In addition, South Dublin County Council will facilitate the expansion and enhancement of existing community facilities and to facilitate the provision of a range of new community facilities in tandem with population growth to meet the needs of future residents of Tallaght (**Objective CF 1**).*

- 7.26 **Comment:** The proposed development includes community and residential facilities such as a large area of public open space (including children's nature-based play areas) at the centre of the site, café/restaurant, retail and office facilities, a tertiary connection through the site as well as a creche facility. The proposal includes a key element of movement infrastructure in the form of a tertiary route bisecting the southern part of the site with pedestrian and cyclist priority, as well as increased permeability through the development. These provide social infrastructure to the new and existing residents of the area.

Childcare Facilities:

It is policy of the plan to facilitate the sustainable development of good quality and accessible early childhood care (early years and general childcare both home based and centre based) and education infrastructure (Objective CF 4).

- 7.27 A c. 257 sqm creche is provided within the development which is considered to provide for the anticipated demand arising from the residential element of the scheme. This has been addressed earlier in this report.

Open Space:

- 7.28 Under the LAP, a minimum of 10% of the gross site area shall be dedicated for use as public open space as well as ensuring new public space is accessible and provides amenity under Objectives CC4 and CC5:

It is an objective of the LAP to provide new areas of public space and to upgrade existing parks so they provide highly amenable spaces for existing and future residents (Objective CC 4).

It is an objective of the LAP to ensure access to all areas of public space and institutional lands is maximised, and major spaces are linked via amenable pedestrian routes. (Objective CC 5).

- 7.29 The LAP includes a provision for tree lined streets along Belgard Road and Belgard Square East, with amenity frontage in the northeast corner of the site as set out in Figure 2.10: Public Realm.
- 7.30 **Comment:** The proposed development provides c. 11% of the site area as public open space. This space is provided within the central courtyard at ground floor level enclosed between Blocks A and B, with passive surveillance from each of the surrounding buildings.
- 7.31 The proposal will include tree planting along each of the public realm interfaces to the north, west and east of the site, with enhanced residential and commercial amenity frontage at this location through the provision of double height windows, increasing passive surveillance and contributing positively to the appearance of the junction of Blessington Road and Belgard Road. Please refer to accompanying Parkhood documents for further details on landscaping scheme.

Archaeological Heritage:

It is the policy of the Council to manage the development of Tallaght in a manner that protects and conserves the Archaeological Heritage of the area and avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest (Objective HC 2).

- 7.32 An Archaeology Report is submitted with the application, as addressed earlier in this report. Please refer to IAC document for further information.

Green Infrastructure:

- 7.33 The objectives of the LAP are to development new elements of green infrastructure, and connections between them, including open spaces, green corridors and tree planting:

To protect, enhance and develop an interconnected Green and Blue Infrastructure network of parks, open spaces, hedgerows, grasslands, protected areas, rivers and streams for amenity and recreation, biodiversity protection, flood management and adaptation to climate change (Objective OS2).

To incorporate new elements of Green and Blue Infrastructure such as tree planting, parks and natural open spaces and sustainable urban drainage systems (Objective OS3).

To support native plant and animal species and encourage corridors for their movement (Objective OS6).

It is an objective of the LAP to enhance existing green infrastructure and facilitate the development of new green infrastructure corridors within and connecting to lands adjoining the Plan (Objective CC 2).

- 7.34 Figure 2.11 of the LAP includes the provision of 'new/improved local green corridor' along Belgard Road, Belgard Square East and Blessington Road.
- 7.35 **Comment:** The proposed development provides planting and green infrastructure in the form of landscaped edges including native species planting and a range of soft landscaping throughout public open spaces and communal roof terraces. This greatly enhances the biodiversity at the site in comparison to its current condition, with landscaping features integrating water attenuation systems and green roofs used throughout.
- 7.36 The proposal promotes permeability through the site for pedestrians and cyclists and includes green, landscaped buffers at site edges which contribute to the creation of local green corridors in accordance with the LAP.

Retail:

- 7.37 The Local Area Plan supports ground floor retail and commercial uses as *they "provide for active and vibrant frontages, increased footfall and provide the potential for a complimentary mix of uses to emerge in the area."* In addition, the provision of retail services enhances Tallaght as a retail area, in keeping with the objectives below:

Tallaght is a major Town Centre, at the top of the County's urban hierarchy and it is the policy of the Council to promote Tallaght Town Centre as the primary urban centre in the County by directing higher order retail and retail services, residential, cultural, leisure, financial, public administration, restaurants/ bars, entertainment and civic uses into and adjoining the Core Retail Area of this centre (Objective ED 12).

It is the policy of the Council to maintain and enhance the primary retailing and major town centre function of Tallaght Town Centre as a Level 2 Retail Centre and to continue to develop Tallaght as a vibrant and sustainable County Town at the top of the County's settlement and retail hierarchies, and improve Tallaght's importance in regional retail terms (Objective ED 14)

- 7.38 **Comment:** The subject site is currently vacant having previously been occupied by Woodies retail warehouse. The site is no longer considered appropriate for a similar scale retailer, with no potential occupiers identified in this respect in recent times. Moreover, the Tallaght town centre area is currently experiencing c. 24% vacancy of retail and commercial units, with many units having long-term vacancies such as the Tallaght Cross East unit previously occupied by Marks & Spencer.

- 7.39 In response to the Tallaght TC primary urban centre and level 2 retail centre designation, the proposed development provides ground floor retail/commercial, café/restaurant and professional services/office space that creates active frontages and adds to the retail variety in the area, complementing the café/restaurant uses proposed and adding to the employment opportunities and economic development in the town centre area. The proposed quantum of retail and commercial use has been increased by c. 34% to that proposed at pre-application stage, providing a total of c. 2,289 sqm. This adds positively to the mix of uses at the development and will enhance the public realm through active frontage and increase footfall and visitors to the site. The proposed development facilitates a complimentary mix of uses to emerge in the area in accordance with Objective ED 12 through the introduction of a mixed-use development comprising 310 no. build to rent residential apartments and c. 2,289 sqm of retail and commercial floor space.
- 7.40 This responds appropriately to the site's designation as a Retail Opportunity Site in Tallaght as discussed above. The proposed provision is considered appropriate and has been informed by market analysis undertaken by Bannon Property Consultants which is appended to this report.

Unit Mix:

- 7.41 The LAP contains multiple objectives relating the mix of units to be provided as part of a development. These are laid out below:

It an objective of the Council to ensure that all new residential development in Tallaght enables the delivery of a mixed and balanced community that is of a high-quality design and complies with Government guidance on the design of sustainable residential development and residential streets including those prepared by the Minister under Section 28 of the Planning & Development Act 2000 (Objective RE 1).

It is policy of the Council to ensure an appropriate housing mix is provided within the LAP lands, therefore a minimum of 30% of units within any new residential development (in the form of either apartments or houses but excluding student accommodation schemes) shall have a minimum of 3 bedrooms (Objective RE 2).

It an objective of the Council to support new and innovative ways to meet housing demands in the County while also ensuring that there is an appropriate mix of tenure and dwelling types provided to meet the needs of the current and future population of Tallaght (Objective RE 3).

It is an objective of the Council to ensure that a mix of tenure is achieved in order to provide an appropriate balance which will promote social integration in Tallaght (Objective RE 4).

- 7.42 However, the plan also acknowledges that Build-to-Rent developments should comply with national policy set out in the 2020 Apartment Guidelines:

It is the policy of the Council to support Build to Rent developments that comply with the housing/occupancy mix requirement specified in this Section and national policy, in particular with the policies and objectives set out in 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)' (Objective RE 5).

- 7.43 **Comment:** The unit mix in relation to the Apartment Guidelines has been addressed at section 5 and is also addressed in the Statement of Material Contravention. The proposal is compliant with SPPR8 of the Apartment Guidelines in relation to unit mix.

- 7.44 The LAP also notes at page 92 that *'to avoid an over proliferation of a single housing tenure, new housing developments in the plan area must make provision for a balanced mix of private, build to rent and social housing to accommodate the needs of a mixed and balanced community'* and that *'all residential development proposals shall state the proposed tenure mix and provide justification for the proposed mix having regard to the socio economic and demographic context of the area. It is an ambition of the LAP to encourage the provision of at least 30% owner occupied units across the LAP area'*.
- 7.45 The proposed development will introduce an element of BTR accommodation into the area which will make provision for a balanced of tenure. The proposal include a mixed tenure of 10% social housing and the remaining balance as private rented accommodation. Section 5.1 of the Apartment Guidelines notes that BTR schemes have a *'potential role to play in providing choice and flexibility to people and in supporting economic growth and access to jobs in Ireland'* and are built for long-term rental and managed by an institutional landlord. A draft BTR covenant is submitted with this application.
- 7.46 As addressed above at 6.98 – 6.102 in response to Policy H1 Objective 13 and Policy HS1 Objective 16, JSA has undertaken a socio-economic and demographic assessment of a 10-minute walk distance from the subject site providing a justification for the proposed development which is also applicable to the content of the LAP relating to tenure. It is also noted that only one BTR development has been permitted within a 10-minute walking band of the subject site at Glen Abbey, which would not result in an over proliferation of the tenure in the area.
- 7.47 It may be considered that the tenure proposed may be considered a material contravention of the LAP on this basis and is addressed in the accompanying Statement of Material Contravention prepared by JSA.

Social Housing: *It is policy of the Council to apply a 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended) to all sites in the Plan area that are solely for residential use or for a mixture of residential and other uses (save where the development qualifies for a modified or amended obligation or is otherwise exempted), to ensure an appropriate distribution of new social housing and to avoid an excessive concentration of social housing (Objective RE 6).*

- 7.48 The development includes 10% of the apartments for Part V in accordance with Part V of the Planning and Development Act 2000 (as amended), as detailed below.

8.0 PART V

- 8.1 The applicant agrees to accept a condition on a grant of planning permission, if the Board is minded to grant the proposed development, which requires the applicant to enter into a Part V agreement with South Dublin County Council as per their requirements prior to the commencement of development.
- 8.2 The applicant's Part V proposals are described and mapped in the Part V material accompanying this application. The nominated units are indicated on the submitted floor plans and a letter is included from SDCC Council indicating that the scheme is capable of complying with Part V requirements. Ravensbrook Ltd propose to allocate 31 no. dwellings (15 no. 1-bed and 16 no. 2-bed units) for the purposes of Part V located throughout the scheme and the proposed costings are also included herein. The accompanying A&L Goodbody letter confirms that the site was purchased in February 2021 and therefore a 10% provision is included, in accordance with the provisions of the Affordable Housing Act 2021.

9.0 CONCLUSION

9.1 The statement set out herein demonstrates the consistency of the proposed development with the relevant national, regional and local planning policy context. At a national and regional level, this statement has demonstrated the consistency of the development with the following:


- National Planning Framework (2018);
- Housing for All – A New Housing Plan for Ireland 2030;
- Regional Spatial and Economic Strategy - Eastern and Midlands Regional Assembly 2019-2031;
- Sustainable Urban Housing: Design Standards for New Apartments (2020);
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;
- Urban Development and Building Height Guidelines (December 2018);
- Sustainable Urban Housing: Design Standards for New Apartments (2018);
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
- Design Manual for Urban Roads and Streets (2013);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Draft Water Service Guidelines for Planning Authorities (2018);
- Quality Homes for Sustainable Communities (2007);
- Transport Strategy for the Greater Dublin Area 2016 – 2035;
- Draft Greater Dublin Area Transport Strategy 2022 - 2042;
- BusConnects – Transforming City Bus Services (2018);
- The Planning System and Flood Risk Management (2009);
- Appropriate Assessment of Plans and Projects – Guidance for Planning Authorities (2009);
- South Dublin County Development Plan 2016-2022;
- Draft South Dublin County Development Plan 2022-2028;
- Tallaght Town Centre Local Area Plan 2020.

9.2 Consistency is also demonstrated with the policies and provisions of the South Dublin County Development Plan 2016-2022, the Draft South Dublin County Development Plan 2022-2028 which is likely to be in effect at the time of the Board's decision on the application and the Tallaght Town Centre LAP 2020 which are the key planning policy documents at a local level.

9.3 It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development comprising residential, open space, and amenity on the subject lands.

9.4 In conclusion, it is respectfully submitted that the proposed development is consistent with and in accordance with the proper planning and sustainable development of the area, and complies with all relevant national, regional and local planning policies and guidelines.

APPENDIX 1: SECTION 247 MEETINGS – SOUTH DUBLIN CO. CO.

<h1>MINUTES</h1>		 John Spain Associates Planning & Development Consultants Chartered Town Planners & Chartered Surveyors 39 Fitzwilliam Place, Dublin 2. Tel: (01) 6625803 E-mail: info@johnspainassociates.com Web: www.johnspainassociates.com	
Re:	S247 Meeting - Belgard Road and Belgard Square East, Tallaght		
Client:	Ravensbrook Ltd		
Job No.	20196		
Meeting No.	1	Date/Time	11am 22.07.2021
Location	MS Teams	No. of Pages	3
Present	<p><u>South Dublin County Council</u> Eoin Burke – Senior Planner Jim Johnston – Senior Executive Planner Graham Murphy – Engineer - Roads Ronan Toft – Engineer - Drainage Oisin Egan - Parks</p> <p><u>Applicant</u> Simon Reader Planner Meadhbh Nolan Architect Bjorn Rosaeg Clara Seeballuck Ben Conway Landscape Andrew Annett Lyn Poon LVIA consultant Darren Carroll Engineer Robert Fitzmaurice</p>		

The following notes were provided by SDCC following consultation on 22nd of July 2021:

Jim Johnston:

- Page 41 of LAP
- Plot Ratio range 1.5:1 (low) and 2:1 (high)
- Page 46 of LAP
- Building height (page 46) res 4-6 south and west elevations, res 6-7 north and east elevations Fig 3.3 does not contain potential for higher buildings at this location
- Proposed tertiary route to south (local route/homezone)
- Page 45 of LAP – mixed use frontage along west and east site boundary
- Mix – to be min of 30% three beds (page 89 of LAP) and at least 30% owner occupied (page 92 of LAP)

- Heat Net to be considered
- Archaeology – within ZAP, due diligence required.
- No POS – page 101 of LAP – Supplementary Development Contribution Scheme re strategic open space etc may be required. Will walkway/route to south be gated with controlled access
- Suggest orientating drawings N-S.

Graham Murphy:

- The LAP requires a tertiary route to south of the site -need detailed design for access – need secondary access in case of blockage/emergency – fire tender access
- right turning movements from car park
- road safety audit
- fire safety audit
- pedestrian permeability
- car parking rate is low – ratio should be 50% of what is required – set down area for commercial area – 10% car spaces needed for electrical charging – 5% mobility impaired – cycle seems okay
- bin storage – management company - taking in charge diagram
- construction and waste mgt plan required
- mobility management plan required
- public lighting to be discussed with SDCC

Eoin Burke:

- financial contribution in lieu of Public Open Space possible through the LAP

Oisín Egan:

- min 10% POS required – need breakdown of types and percentages of open space
- suds to be shown
- need opportunities for play within POS
- overshadowing and wind tunnel within pos to be considered
- permeability map to be provide
- Landscape masterplan and planting plan required – set out spec for street trees – provision for teenagers within pos – light foliage for trees closer to bldgs.

Ronan Toft:

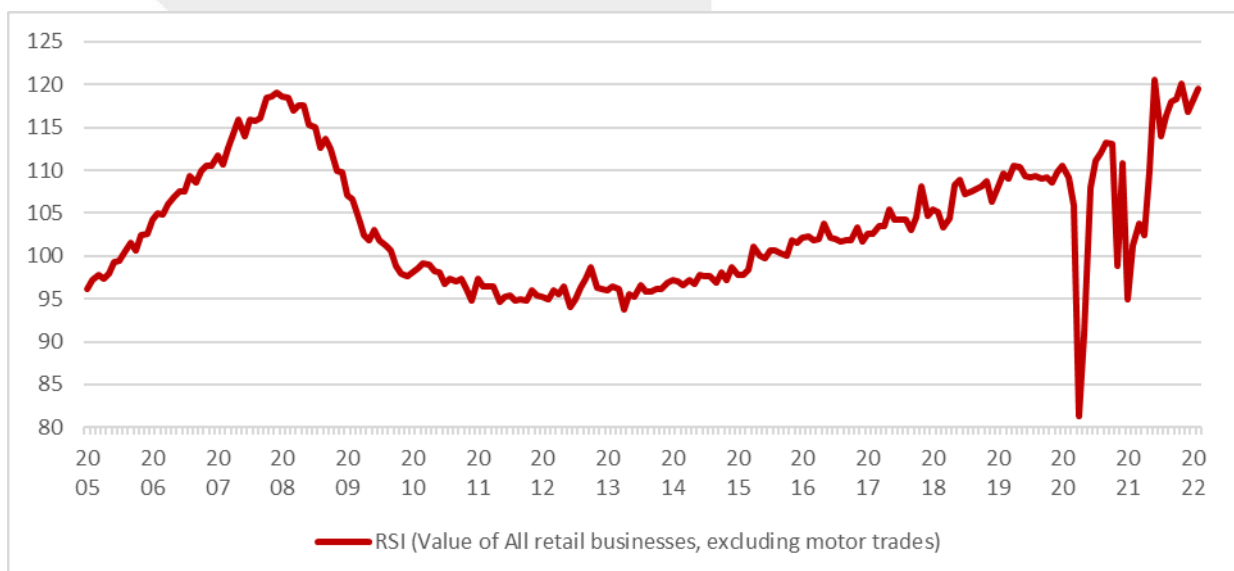
- west of site is a surface water sewer - Setback required to sewer, concerns re. proximity of buildings to the sewer
- SUDS – are water features on drgs connected to surface water – need backup for pump failure
- Foul – need pre-connection to Irish Water
- Flood risk assessment needed

APPENDIX 2: BANNON PROPERTY CONSULTANTS REPORT

Belgard Road Development Site Retail Provision

A The Retail Market

The retail sector has had a challenging period since the GFC, better known as the Global Financial Crisis, in 2008. Ireland experienced a retail recession from 2008-2013 followed by a steady recovery in consumer's balance sheets and retail spending generally from 2014 onwards.



Source Central Statistics Office

The rate of this recovery although steady has been modest with retail sales values (excl. motor trades) only reaching levels achieved in 2007 after 15 years. This recovery was derailed between 2020-2021 by the restrictions associated with COVID and this was most severely felt in Major Town and City centres. Recovery post COVID restrictions has seen retail sales return to their pre pandemic trend line.

The vitality of the retail market requires a healthy and appropriate correlation between the supply of retail space and the demand represented by retail sales that can take place within the stores. Consumers are not democratic with their spend and do not spread it evenly over the range of retail space that is made available to them, they spend in the location or the format that offers them the best combination of choice, value, convenience, and positive experience.

The growth of online retailing has had the nett effect of creating more virtual space in the market increasing the options for consumers. It is estimated that 5% of sales by Irish retailers took place online in March 2022 (Source: CSO). It should be noted that this figure does not take into account the online retail activity of non-Irish based platforms such as Amazon.co.uk where it can be assumed a substantial additional level of on-line spend takes place.

Prior to the GFC ambitious plans for the expansion of the Irish retail sector were enshrined in Development Plans across the country. These plans were based on the anticipation of continued growth in retail spend that had been experienced prior to the GFC. The opposite occurred with retail sales values dropping by 20%. The combined impact of the post GFC recession and the growth on online retail means much of the anticipated demand has dissipated and consequently the requirement for large increases in retail accommodation has been removed. This is evidenced by the lack of new retail developments in Ireland since 2008.

The effect of the ambitions of developers and planning authorities exceeding the demand from occupiers is evident in Tallaght Town Centre at The Tallaght Cross development which was completed in 2009 and has remained effectively vacant for the last decade.



Tallaght Cross

Adding additional space to the retail supply in Tallaght in a peripheral location to the retail core such as the subject site is unwarranted and is likely to lead to further vacancy.

B The Retail Market in Tallaght Town Centre

Tallaght Town Centre current has a retail supply in excess of 72,000 sq.m. The largest components of this are The Square, 50,000 sq.m., Tallaght Cross West/Tallaght Central (formerly Glass Haus) 18,000 sq.m. and Belgard Square 4,400 sq.m. In addition there is further retail within Tuansgate and other smaller retail units across the Town Centre. This figure does not include the retail in the various developments along the Belgard Road.

This makes Tallaght one of the largest concentrations of retail space within Ireland. Unfortunately, large elements of this retail space outside of The Square are vacant. A substantial proportion of this space has never been occupied.



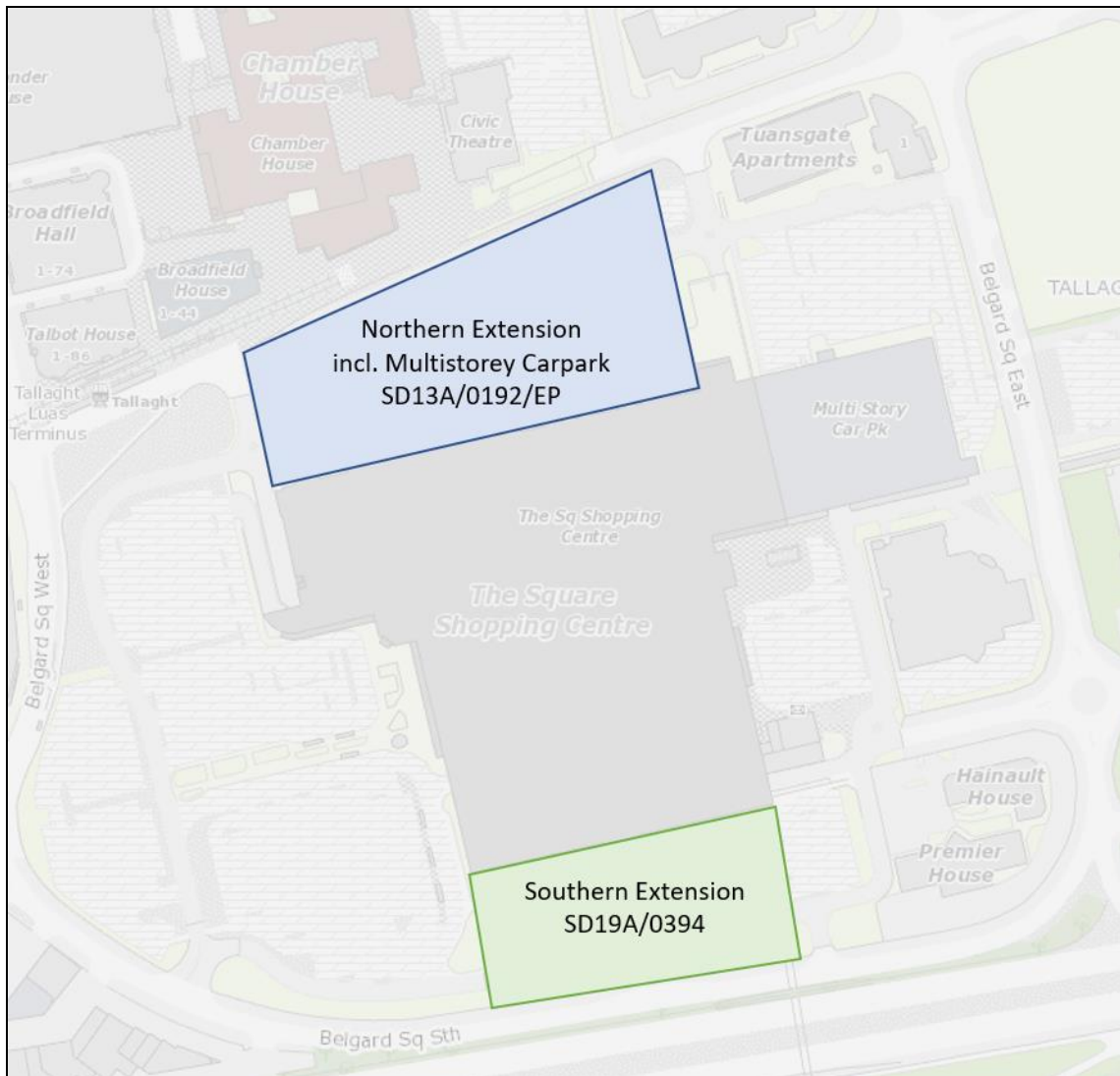
Tallaght Central

We estimate that current vacancy within the Town Centre area exceeds 17,000 sq.m., a vacancy rate of 24%.

As various Town Centre sites in Tallaght are developed to provide residential accommodation the resident population will increase but based on the current vacancy and approved retail space within The Square there is a more than adequate supply currently in place to satisfy this demand. Adding additional retail space without a clear indication as to where the additional spend is going to come from is repeating the failed approach of previous developments and expecting a different result.

C Location of retail within Tallaght Town Centre

The total zoned Town Centre area within Tallaght is c.68 ha. A large proportion of this is dedicated exclusively to single uses, namely Tallaght University Hospital (c.9.2 ha), TU Dublin (c.19.3 ha) and The Square (c.3.4 ha). In addition, there is planning permission (SD13A/0192/EP and SD19A/0394) to further expand The Square providing a mix of retail and food and beverages offers. Upon delivery this will expand the area exclusively dedicated to these uses to c. 5.8 ha. The combined total of these single use areas within Town Centre area occupies approximately 50% of the Town Centre Zoned land.



The Square

This provision of dedicated retail area within The Square has been commercially successful with low vacancy rates despite the ongoing challenges the sector has faced since 2008. The recent failures of Debenhams and the Cinema were quickly replaced with Penneys and Movies@ respectively. It is worth noting that neither of these occupiers elected to occupy pre-existing vacant space within the wider Tallaght Town Centre during the previous decade. The low vacancy in The Square demonstrates that the agglomeration of retail uses within the core can provide a successful and

comprehensive range of services and facilities to the wider town centre users be they residents, workers, or students.



The Square, Tallaght

Given the areas of the Town Centre that are dedicated exclusively to retail the concept of having sites within the Town centre dedicated exclusively to residential or other uses has the nett effect of creating mixed use within the town centre. When analysed collectively what the Town Centre lacks is residents not more retail. There is currently more than adequate retail space, both occupied and vacant, to serve the needs of new residents within walking distance of their new homes.

D What each apartment means in terms of retail sales

There is a mistaken belief that the ground floor retail within residential developments can be sustainable from the spend generated by the occupants of the apartments above. Given the densities in Ireland, even in Town Centres, this does not stand up to scrutiny. There are 310 apartments proposed in the subject development, 99 no. 1 beds, 203 no. 2 beds and 8 no. 3 beds. Applying the CSO household expenditure data to these households creates an annual potential total retail spend of €11m from the residents of the development. For this exercise we have estimated an average of 68% of the average household spend to allow for the average unit size, assuming that one beds have 50% of the national household occupancy, 2 beds 75% and 3 beds 100%.

This €11m potential spend however includes all of the residents' potential annual spend including their expenditure on items such as housing & transport. When you extract the items of retail sales that will not take place in shops and then apply a rational market share to the relevant sales you can expect an annual retail spend to be captured by the shops within the development of €758,000 per annum.

	2015	2022		Potential Spend of Development	Market Share	Max Retail Spend Available
		Weekly	Annually			
Household Budget Survey						
Total average weekly household expenditure	€ 566.64	€ 688.32	€ 35,792.56	€ 11,095,693.02		
Total food	€ 83.41	€ 101.32	€ 5,269	€ 1,633,345	20%	€ 326,668.90
Total drink and tobacco	€ 18.95	€ 23.01	€ 1,197	€ 370,974	10%	€ 37,097.38
Total clothing and footwear	€ 22.77	€ 27.66	€ 1,438	€ 445,831	0%	€ -
Total fuel and light	€ 26.09	€ 31.69	€ 1,648	€ 510,884	0%	€ -
Total housing	€ 111.21	€ 135.09	€ 7,025	€ 2,177,616	0%	€ -
Total household non-durable goods	€ 11.17	€ 13.57	€ 706	€ 218,742	10%	€ 21,874.20
Total household durable goods	€ 18.61	€ 22.60	€ 1,175	€ 364,349	0%	€ -
Total transport	€ 84.16	€ 102.24	€ 5,316	€ 1,648,051	0%	€ -
Total miscellaneous goods, services and other expenditure	€ 190.27	€ 231.13	€ 12,019	€ 3,725,769	10%	€ 372,576.91
						€ 758,217.39
Assumed Ratio of average household spend for 1 bed		50%				
Assumed Ratio of average household spend for 2 bed		75%				
Assumed Ratio of average household spend for 3 bed		100%				
1 Beds		99				
2 Beds		203				
3 Beds		8				
Development Ratio		68%				

Source: CSO Household Budget Survey, CSO Retail Sales Index, Bannon Research

Assuming a minimum viable annual turnover for a retail unit of €5,000 per square meter means the available spend for the residents will support a retail area of approximately 152 sq.m. as opposed to the 2,000 sq.m. proposed. This is because the new residents will carry out most of their grocery shopping in the large Tesco or Dunnes supermarkets which will be within a 5-minute walk of the development, they will purchase their clothing and footwear from the multiple outlets within The Square and get their household goods from the retail parks on the Belgard Road, also within walking distance.

Any reduction in the apartment numbers or increase in the retail area makes this spend analysis more stark.

Consequently, the retail spend must be generated from residents elsewhere. This is either a diversion of spend from an existing retail location or assumes that customers are going to come

from outside of the town centre and spend within the retail provided within this development. It is not clear why potential shoppers from elsewhere will visit this development as opposed to the shops within the retail core or those already in place in the surrounding developments. If surplus spend is generated by an increase in local population it would seem appropriate to allow this extra spend to generate demand for the currently vacant space within Tallaght Town Centre before providing new space.

E Retail wrapping the ground floor of residential blocks

The provision of retail on the ground floor of residential blocks to create animation has proven to be a difficult concept to deliver successfully. Ultimately what creates animation is the profitable interaction between retailers and their customers. Consequently, the provision of retail in itself will not create animation as without customers the shops will either remain vacant, morph into non-retail uses or end up as boarded up failed shops. For retail to work on multiple frontages of a new development requires each of the relevant facades to form part of a natural and active pre-existing desire line for customers. Provision of the retail does not create the customer flow unless it is of such a scale to become a destination in itself. In the subject development there are three separate proposed retail frontages each with a different profile and potential customer interaction. None is located on a natural desire line for customers and as demonstrated above there will not be sufficient occupants within the development to sustain the proposed level of retail.

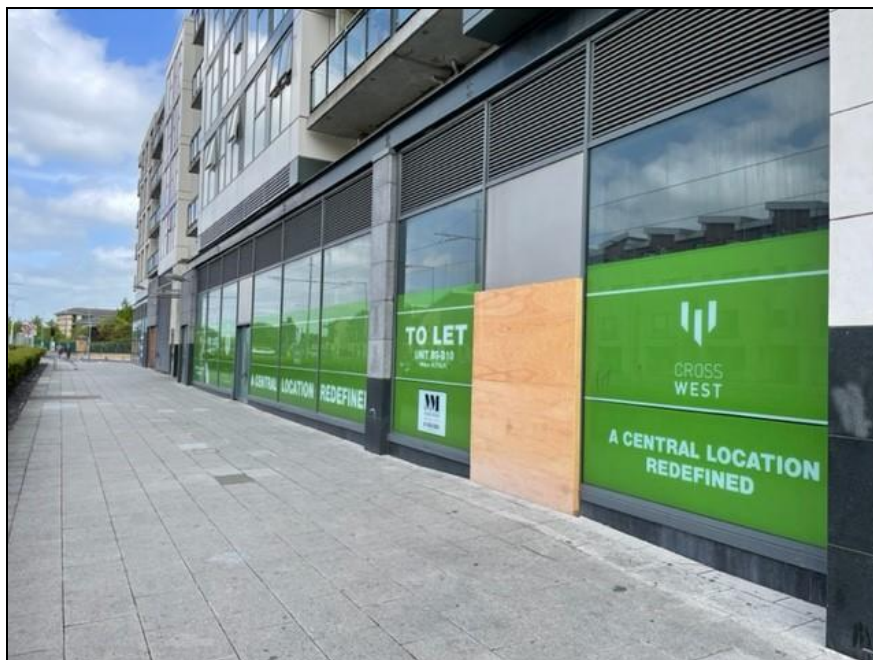


Examples in the local area where retail was supplied in order to create animation on ground floor of residential development are available in Belgard Square and Tallaght Cross. Despite being located adjacent to The Square, the Tallaght Luas stop and on the potential desire line between the Hospital and the Shopping Centre the retail within Tallaght Cross East & West has failed.

Marks & Spencer were originally induced into the Tallaght Cross East (then Glasshaus) scheme. To secure them as an anchor they were effectively given the store rent free for the period of their occupancy. Their trading performance however never lived up to expectation and despite their strong draw as an anchor no other retailers followed them, and they ultimately closed the store.



The core street within the development runs East to West, originally anchored by Marks & Spencer to the East and Aldi the West. The scheme also benefits from generous car parking provision and provided units of a size not readily available in The Square. Despite these advantages the occupiers did not arrive.



In a format similar to the current proposal retail is wrapped on all sides of the Tallaght Cross development with units on the Northern, Western and Southern elevations. None of these stores have ever been occupied by retailers.



Similarly, in Belgard Square the only retail that has attracted regular occupiers has been the Eastern elevation. In a similar format to that adopted in Tallaght Cross and the subject development proposal retail was wrapped on all sides and on an internal street. This balance of the retail has either never been occupied or has experienced consistent occupier failure.

Evidence of the same failure to create animation is scattered throughout Dublin and beyond where the ground floors of apartment buildings have been designated as retail to create animation without due consideration the viability of the occupiers. Their viability is not a question of rental levels, as was evident in the case of Marks and Spencer. Rent represents a relatively minor proportion of a retailer's outgoings and regardless of the rental level if there is not sufficient trade from an identifiable and relevant customer base retail will fail.

Summary

Building retail space on the assumption that when provided it will be occupied is a flawed strategy. Retail is only viable when supported by identifiable retail spend and those that generate the spend, consumers, will go where they get the best overall experience for their time and money.

Providing retail that ultimately fails leads to a diminution of experience for both the retailer, consumer and ultimately the residents of the homes above. Consideration should be given to other more viable forms of potential animation at ground level.

Options

The format of retail that may work within the subject development are businesses which do not fit naturally in the retail core at The Square. Financial and Professionals services such as banking, credit unions and estate agents are rarely part of the make-up of a dedicated shopping centre and have trading hours more suited to High Street locations. This may extend to other professional services such as local solicitors and accountants / tax advisors. There may also be scope for medical services such as dental, physiotherapy, dieticians etc.

Similarly local coffee shops and small-scale food operators such as sandwich and specialist food offers may suit the proposed retail offer. They may be more viable locations of these operators given the lower costs associated with service charge and rents.

Unit	Description	Area (sq.m.)
A1	Retail / Licensed Restaurant	284
A2	Retail / Licensed Restaurant	325
A3	Retail / Financial Services / Office	233
B1	Retail	145
B2	Retail / Estate Agent / Office	226
B3	Retail	109
B4	Retail / Café	252
C1	Retail	114
C2	Retail	98
C3	Creche	257
B2.1	Retail / Offices	127

The retail proposed is of a different scale to that currently on offer within the retail spine within the Tallaght Cross developments where large-scale units remain vacant. They will however compete for occupiers with the currently vacant unit on the Northern and Western elevations of both Belgard Square and Tallaght Cross.

Bannon Credentials

Bannon is Ireland's largest domestically owned Commercial Property Consultants with a team of 55 experienced Chartered Surveyors and Commercial Property Consultants. Bannon is Ireland's retail specialist and has an intimate understanding of not just the physical assets and the wider retail market but also retailer business models. Bannon lease, manage and design more retail destinations than any other company in Ireland and are currently engaged in respect of The Square in Tallaght, Blanchardstown Town Centre, Pavilions Shopping Centre, Ilac & Stephen's Green Shopping Centre within Dublin which collectively make up most of the purpose-built retail space in Dublin. Bannon were also leasing agent for Dundrum Town Centre during its development and up to its sale in 2015. In total Bannon are leasing and managing agent on over 25% of Ireland's purpose-built retail infrastructure.

Recently Bannon was engaged by Dublin City Council to prepare report on the Role & Function of Retail in the City Centre to advise the local authority in drafting of the County Development Plan 2022-2028.