

Ref: ABP-313591-22

INTRODUCTION

South Dublin County Council hereby sets out its Chief Executive's Report, including recommendations on the above Strategic Housing Development for An Bord Pleanála (ABP or The Board). The Board as the competent authority has validated the application, and will carry out an Appropriate Assessment Screening of the proposed development, and will decide to grant or refuse permission for the proposed development.

Statutory Requirements of this Report

This report sets out, in accordance with the provisions of the Planning and Development (Housing) and Residential Tenancies Act 2016 and the Planning and Development (Strategic Housing Development) Regulations 2017 - inter alia:

1. A summary of the points raised in the submissions received by An Bord Pleanála on the application.
2. The Chief Executive's view on the effects of the proposed development on the proper planning and sustainable development of the area and on the environment, having regard to matters specified in Section 34(2) of the Planning and Development Act, 2000 (as amended) and submissions received by An Bord Pleanála on the application.
3. A summary of the views of the relevant elected members on the proposed development as expressed at a meeting of members of the Tallaght Area Committee meeting on 27th June 2022.
4. The Planning Authority's opinion as to whether the proposed strategic housing development would be consistent with the relevant objectives of the development plan or local area plan, including a statement as to whether the Planning Authority recommends to An Bord Pleanála that permission should be granted or refused, together with the reasons for its recommendation.
5. Conditions of permission
Where the Planning Authority recommends that permission be granted or refused, the planning conditions and reasons for them that it would recommend if An Bord Pleanála grants permission.

Summary of Key Issues Arising

1. Tallaght Town Centre Local Area Plan 2020

The LAP provides a plan led approach to the regeneration of the area. The proposed development would contravene objectives of the Tallaght Town Centre Local Area Plan 2020 relating to the following matters:

- Building Height
- Plot Ratio

- Housing Mix
- Land Use Mix / Urban Function
- Sequencing

2. Drawings are inconsistent across floor plans and elevations of the site.

3. The perimeter parking layout could impact the future permeability of the envisaged urban block as per the LAP, restricting the ability to connect with development sites to the south and east.
4. The development of this site would be contrary to the sequencing specified in the LAP.
5. Insufficient cycling infrastructure. A dedicated cycle link to the wider cycle network in the form of the proposed Cycle South Dublin network on Airton Road is required.

PROPOSED DEVELOPMENT

Development Description

The development will consist of **242 apartments**, in 5 no. blocks ranging from 4 to 7 storeys, comprised of:

- 96 no. 1 bedroom apartments
- 141 no. 2 bedroom apartments
- 5 no. 3 bedroom apartments

A **childcare/creche facility** (465 sq.m) will be located at the ground floor of Block D, and a café (50.9 sq.m) will be located at the ground floor of Block C.

Residential amenity areas will be provided as follows: **reception (125.1sqm), resident lounge (45sqm), letting office (11.8sqm), rentable room/studio space (39sqm), public gym (128.5sqm) and a public co-working space** (128.4sqm). These facilities would all be located at the ground floor of Blocks B & C.

All residential units will have private open space in the form of either a balcony or terrace.

Open space will be provided as follows:

- 1,797.4 sq.m communal open space
 - 2 no. roof top terraces located at Blocks D and E (243.4 sqm and 323.9 sqm respectively)
 - Courtyard space, outdoor seating, planning and pedestrian and cycle links, all at ground floor level
- 1,400 sq.m public open space
 - Courtyard area including outdoor seating, paved areas, lawn area and play areas
 - Outdoor seating area to the front of the proposed café at Block C

Surface level car parking (136 no. spaces) will be provided, including 7 accessible spaces.

Visitor and resident bicycle parking shall be provided in bike stands and secure stacked bike spaces (total 426 no. spaces).

A new vehicular access will be provided onto Broomhill Road to serve the development, to the southwest of the development. Upgrade works are proposed to the existing vehicular access point to facilitate the proposed development and provide for improved access and egress to the overall development.

New pedestrian and cyclist access points will be provided onto Broomhill Road from the site.

The development shall be served via a new vehicular access point from Broomhill Road. Upgrade works are proposed to the vehicular access point to facilitate the proposed development and to provide for improved access and egress for the overall development. New pedestrian and cyclist access points will be provided on to Broomhill Road from the site. The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; boundary treatment; internal roads and footpaths; waste storage areas and electrical services and all associated site development works.

Development Statistics

Development Statistics (all values as stated in application form or planning statement)

	ABP-311725-21 (Stage 2 Pre-Planning)	This Application (Stage 3)
Tenure	Build-to-Sell (indicated at stage 1)	
Total Apartments	242	242
Unit Mix		
1-Bed Apartments	96 (39.7%)	96 (39.7%)
2-Bed Apartments	141 (58.3%)	141 (58.3%)
3-Bed Apartments	5 (2%)	5 (2.1%)
Total Units	242	242
Retail Units	1 (Café 50.9m ²)	1 (Café 50.9m ²)
Crèche Floor Area (Sq.m.)	509	465
Crèche Spaces	142	134
Gross Site Area	1.4 ha	1.4 ha
Communal Amenity Space (Sq.m.)	2,374 sq.m	1,797.4 sq.m
Public Amenity Space (Sq.m.)	Applicant did not distinguish between public and communal space	1,400 (10%)
Density (Net Site Area)	172 dph	172 dph

	ABP-311725-21 (Stage 2 Pre-Planning)	This Application (Stage 3)
Plot Ratio	1.6	1.6
Building Height	4 – 7 storeys	4 – 7 storeys
Dual Aspect	48%	49%
Gross Floor Area (Sq.m.)	22,500 sq.m	22,500 sq.m
Car Parking Provision	142 (surface)	136 (surface)
Car Parking Ratio	0.59	0.56 (stated as 0.57 in Traffic Assessment based on incorrect parking figure)
Bicycle Parking	Residential: 288	Visitor: 118
	Total: 406	
Bicycle Parking Ratio	Residential: 308	Visitor: 118
	Total: 426	
Bicycle Parking Ratio	0.78 per bedroom	0.78 per bedroom

Procedural Note and Summary of s.247 Consultations

Pre-Planning with the Planning Authority (SDCC Ref. SHD1SPP006/21)

The applicant met with the Planning Authority on 30th April 2020 (via Teams) to discuss a proposed development consisting of 249 units and all associated site development.

The main points of preplanning discussion were:

- Building heights contrary to LAP.
- Plot ratio contrary to the LAP.
- Mix of Uses: LAP seeks business and employment uses in this area, with residential uses concentrated on Airton Road.
- Breaches building line on Broomhill Road – might be acceptable in context of REGEN.
- Lack of 3-Beds
- Access and control of central open space – question as to whether it is public or communal.
- Advise integration with HeatNet and futureproofing.
- Create active street frontage and blocks of reasonable length (less than 100m)
- We would prefer employment uses on the site, and a mix of active uses to western frontage.
- Streetscapes require careful consideration and consideration also required in relation to connectivity / permeability as area regenerates.

Stage 2 Pre-Planning Consultation with An Bord Pleanála and South Dublin County Council (ABP Ref: ABP-311725-21)

The applicant's agent and design team attended a preplanning consultation meeting with the Planning Authority and An Bord Pleanála on 28/01/2022, held remotely. This meeting considered a proposal for 242 no. units (268 no. houses and 360 no. apartments), creche and a café. The proposal also included resident only facilities and associated site works, at a site on Broomhill Road, Tallaght.

The Board's Consultation Opinion was released in February 2022. The Board confirmed that the documents provided would constitute a reasonable basis for making an application. However, the

Board also advised that the following specific information was provided with any application for permission:

1. Rationale outlining how predominantly residential development is in compliance with local planning policies
2. Drawings and documentation demonstrating how development will relate to and facilitate future connections with adjoining lands
3. Drawings identifying clearly defined public and communal open space
4. Management plan for proposed uses and public open space
5. Assessment of requirement for Aeronautical Assessment
6. Assessment of the noise environment
7. Report addressing proposed materials and finishes
8. Building lifecycle report
9. Drawing identifying areas intended to be taken in charge
10. Response to matters raised by SDCC Environmental Services
11. Statement on consistency with relevant objectives of the development plan
12. Information referred to in Article 299B(1)(b)(ii)(II) and Article 299B(1)(c) of the Planning and Development Regulations 2001-2018, unless an EIAR is to be submitted.

The Board also specified those external consultees it would be necessary to notify about the application.

DEVELOPMENT CONTEXT

Site Description

The site is located on Broomfield Road and Broomfield Terrace, and accommodates a vacant industrial warehouse unit and car park. The site is bound by Broomfield Terrace to the north, Broomfield Road to the West, an active commercial/light industrial site to the south, accommodated in a single-storey brick building. To the east, the site backs onto other industrial warehouses. This stretch of Broomfield Road maintains a neat building line and grass verge to the roadside edge.

Site Area

Stated as approximately 1.4 ha.

Site Visit: 10 June 2022

Zoning and Council Policy

The lands are zoned Objective 'REGEN' in the South Dublin County Development Plan 2016 - 2022, '*to facilitate enterprise and/or residential led regeneration*'.

The subject lands are located within the development boundary of the Tallaght Town Centre Local Area Plan 2020.

The subject lands are located in the Broomhill Neighbourhood area identified in the Plan. The LAP provides the following vision for the Broomhill Neighbourhood:

An attractive consolidated, diversified and intensified place for business and employment that is better connected to surrounding places. Emerging residential uses along the southern side of Airton Road.

The land use mix/urban function is envisioned as being 'Predominantly business, enterprise and employment area with more mixed use residential development fronting along the southern side of Airton Road, subject to integrating effectively with existing surrounding uses.' Key objective BH1 of the LAP states the aim for the area to 'transition to mixed use area primarily focused on higher value commercial uses.'

The subject site is located in the middle of the Broomhill neighbourhood, and is surrounded on all sides by commercial, industrial or light industrial uses.

SEA Sensitivity Screening

The site is not located within or near any relevant environmental layers. The SEA Sensitivity Screening is an internal SDCC tool.

CONSULTATIONS

Internal Consultees

Environmental Services	No objection, subject to conditions .
Housing Strategy Unit	No objection, subject to conditions .
Public Realm	No objection, subject to conditions .
Roads	No objection, subject to conditions .
Heritage Officer	No observation received

External Consultees

National Transport Authority	No observation received.
Transport Infrastructure Ireland	No observation to make.
Environmental Health	No observation received
Irish Water	No observation received
South Dublin County Childcare Committee	No observation received

Transport Infrastructure Ireland (TII)

- TII provided a response stating they have no observations to make.

Irish Water

- No response was received by Irish Water however, conditions relating to a connection agreement and compliance with Irish Water Standards codes and practices should be included in the event of a grant.

Third Party Observations

The following third party observations were received:

- 2 institutional / external consultees (see above)

- 1 residents' association
- 1 environmental group
- 1 local business

Tallaght Community Council

This submission does not appear to relate to the current application and makes several references to a different SHD application nearby. Points of potential interest raised in the submission include:

- Building height and impact on skyline
- Fire safety risk of taller buildings

Louth Environmental Group

- S.28 Ministerial guidelines are unconstitutional.
- Material contravention of the County Development Plan / Local Area Plan in relation to density, housing mix, public open space, building height and visual impacts, car parking, childcare, an architectural conservation area.
- EIA Screening is inadequate and not comprehensive. An Bord Pleanála lacks ecological expertise of access to that expertise as required under the EIA Directive.
- Screening for Appropriate Assessment is inadequate.

Vetpharm

- Potential to seriously injure continued operations at pharmaceutical facility
- Lack of consultation from applicant
- ESB substation to be removed serves neighbouring site
- Dust emissions – no risk assessment undertaken
- Noise emissions – adjacent site a noise sensitive receptor
- Vibration impacts
- Temporary car parking/construction traffic
- Security concerns
- Issue of complaints once residential development is finalised
- No assessment of lighting impacts on adjacent site

Elected Representatives

The proposed development was presented at the Tallaght Area Committee meeting on 27th June 2022. Summary of councillors' comments below:

- **Cllr Dunne**
 - Completely unaffordable for rent and buy
 - Social housing list having to be subsidised
 - Piecemeal offering Part V is not enough – not how we're going to deal with the housing crisis
 - Developers, greed, not about sustainable communities
 - Unelected officials making decisions having huge impact on county
 - Five 3 beds, contravenes LAP/CDP
 - 10% POS is a disgrace

- 1km distance 439 apartments proposed with no facilities on main roads where traffic is already congested
- Totally opposed
- ABP totally disregarding every individual in this chamber
 - Work put into staff is constantly contravened
- Ridiculous at this point, needs to end
- Not going towards building sustainable communities
- Has to be transparency about who the developers are – want details on applicants at future meetings
- **Cllr O'Connor**
 - Congratulate Louise on her emotional contribution
 - Views expressed earlier
 - Can't see where this is going, not in interest of the community
 - Don't know how we'll cope without facilities
 - I do object
 - Upset at attack on communities with all these apartments
- **Cllr Holohan**
 - Don't have the facilities to serve the people who'll be in these apartments
 - About greed, not need
 - Need relief on social housing list and homeless list
- **Cllr Costello**
 - Slide 14 – felt claustrophobic
 - Different level of disrespect
 - Attack on Tallaght
 - Lack of car parking spaces
 - No gp to be found, shortage of gps, nothing included in any of the plans
 - Vetpharm business – broomhill is an industrial estate area, coming in and disrespecting the local area
 - 5 3 bed dwellings in 5 blocks, do families not count? Haven't read the memo, just doing what they want
- **Cllr Sinclair**
 - Same points as previous SHD
 - Clarity on same situation build to sell/build to rent?
 - 1 beds not suitable
 - Don't have faith in people who ultimately make these decisions, unelected officials, political appointees
- **Cllr Whelan**
 - Echo disgust
 - Young people can't afford to live in their own area, rent or buy
 - Losing workforce
 - Need to be fighting for the community
 - Developers who caused housing crisis will not be the ones to get us out of it
 - Need to change approach
- **Cllr Duff**
 - Absence of views from Kilnarnagh side – what impact will it have from that area
 - Decision should be made by representatives of electorate

- Transport, access, scale

PLANNING HISTORY

Subject Site

S00A/0558: 7407.58 Sq.M of telemarketing sales/ IT software/Development/offices/ Data processing/Light industrial in a development comprising two blocks three storey plus penthouse and two storey, both over 2 layers of basement car parking. **Permission granted** – not implemented.

S01A/0887: Demolition of existing building and erection of 15,680 sq.m. of office/office-based industry with 360 sq.m. for a creche in a development comprising three blocks: Four storey plus penthouse, Three storey plus penthouse, over two levels of basement car parking comprising a total of 470 car parking spaces on a site of 9,165 sq.m. (2.26 acres). This application is accompanied by an Environmental Impact Statement. **Permission refused 21/02/2022.**

Adjoining Site

SD19A/0085: Demolition of a single storey modular building extension to the rear (north) of the existing facility building and the provision of a 26.68m x 7.43m x 3.51m high (gross floor area of 187sq.m) single storey modular building and associated works to the rear (north) of the light industrial facility. **Permission granted.**

Nearby Sites

SHD3ABP-306705-20 (Former Gallaher's Cigarette Factory site, at the junction of Airton Road and Greenhills Road): Demolition of existing factory/warehouse buildings on site (total floor area c. 10,076.8sq.m). Construction of 502 apartments (comprising 197 1-bed; 257 2-bed; and 48 3-bed units) within 6 blocks ranging in height from 4 to 8 storeys. All residential units provided with associated private balconies/terraces to the north/south/east/west elevations. Provision of residential amenity facilities, 3 retail units, creche and services/bin store areas (total non-residential floor area c.1,839sq.m). A total of 202 car parking spaces (at basement and undercroft levels) and 584 no. bicycle parking spaces. Vehicular/pedestrian/cyclist accesses from Greenhills Road and Airton Road. Provision of road improvements and pedestrian crossings. All associated site development works, open space, landscaping, boundary treatments, plant areas, pv panels (at roof level), waste management areas, and services provision (including ESB substations). **Permission Granted by ABP – SDCC Report recommend refusal.**

SHD3ABP-305763-19 (Site at the corner of Airton Road and Belgard Road): Demolition of the existing industrial buildings on site (4,800sq.m) and the construction of 2 blocks comprising: 328 apartments (93 1-bed, 222 2-bed and 13 3-bed), ancillary residential support facilities and commercial floorspace measuring 31,147sq.m gross floor space above a single basement level measuring 5,861sq.m. Block A is a part-5 to part-7 storey (13,710sq.m) over basement block comprising 149 apartments with office space (222sq.m). Block B is a part-6 to part-9 storey (17,437sq.m) over basement block comprising 179 apartments, 2 double-height retail/commercial (Class 1/Class 2) units (354sq.m), a café/restaurant (313sq.m), a creche (360sq.m), internal residents amenity area (644sq.m) at ground floor including reception (37.7sq.m), residents lounge (91.3sq.m), private dining area (52.6sq.m), co-working space (45.5sq.m), games room (47.3sq.m),

gym (80sq.m) and communal lounge (220sq.m) at 6th floor level. The development also consists of the provision of a landscaped courtyard; public plaza at the corner of Airton and Belgard Road; pedestrian access from Airton Road to the Technological University campus; balconies; landscaped roof terrace at 6th floor level (7th Storey) of Block B (671sq.m); 184 car parking spaces at basement level including 14 club car spaces, 10 disabled parking spaces and 4 creche parking spaces; 727 basement and surface bicycle parking spaces; 4 motorbike parking spaces; bin storage; boundary treatments; green roofs; hard and soft landscaping; plant; lighting; Vodafone cabin sub-station; ESB sub-stations, switch rooms and generators; and all other associated site works above and below ground. **Permission Granted by ABP – SDCC Report recommend refusal.**

SHD3ABP-303306-18 (Junction of Belgard Road and Belgard Square North): Development of 438 apartment units consisting of 158 no. 1 beds, 230 no. 2 beds and 50 no. 3 beds (total apartment units include 8 no. live/work units with a total c. 509 sqm work areas at ground floor) and c. 732 sqm of tenant/resident service amenities all within blocks A1, A2, A3 and B1. Block B2 to comprise a 403 bedspace student accommodation scheme and associated student amenity and staff facilities (c.815 sqm); childcare facility (c.380 sq.m) and external playing area (c. 242sq.m); 6 retail/commercial units (c. 632sq.m in total); security room (c.52sq.m); 107 car parking spaces below podium; 22 car parking spaces at surface level; 1227 bicycle parking spaces; 4 semi-private courtyards of c. 5,516sq.m; public plaza; public realm & landscaping (c.7,442sq.m). **Permission Granted by ABP – SDCC Report recommend granting.**

Relevant Recent Enforcement History

None recorded.

RELEVANT POLICY AND GUIDELINES

Relevant Government Policy

National Planning Framework

National Strategic Outcome 1 of the NPF refers to and, stresses the importance, of ‘*Compact Growth*’. The NPF states,

‘From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages and ensuring that, when it comes to choosing a home, there are viable attractive alternatives available to people’

The NPF indicated that the delivery of compact growth will be through National Policy Objective 2a, which states,

‘A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs’

and National Policy Objective 3a, which states,

‘Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements’.

The National Planning Framework also includes a specific Chapter, No. 6, entitled ‘People, Homes and Communities’. It includes 12 objectives from among which:

Objective 27 seeks to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.

Objective 33 seeks to prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

Regional Spatial & Economic Strategy 2019-2031

Dublin City and suburbs is considered in the context of the MASP and is dealt with in greater detail in Chapter 5 Dublin Metropolitan Area Strategic Plan (MASP). A number of key Regional Policy Objectives are considered relevant:

RPO 5.3: Future development in the Dublin Metropolitan Area shall be 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 attractive street environment for pedestrians and cyclists.

RPO 5.4: 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’.

RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.

National Policy Documents of Relevance

Project Ireland 2040 National Planning Framework, Government of Ireland, 2018.

Regional Spatial & Economic Strategy 2019-2031, Eastern & Midland Regional Assembly (2019)

Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities’ (2018).

Urban Development and Building Heights – Guidelines for Planning Authorities’ (2019),

Quality Housing for Sustainable Communities-Best Practice Guidelines, Department of the Environment, Heritage and Local Government, 2007.

Sustainable Residential Development In Urban Areas - Guidelines for Planning Authorities, Department of Environment, Heritage and Local Government (December 2008).

Urban Design Manual; A Best Practice Guide, A Companion Document to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, Department of the Environment, Heritage and Local Government, (2008).

Design Manual for Urban Roads and Streets Department of the Environment, Community and Local Government and Department of Transport, Tourism and Sport (2013).

Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government, (2009).

The Planning System and Flood Risk Management - Guidelines for Planning Authorities, Department of the Environment, Heritage and Local Government & OPW, (2009).

Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice, Building Research Establishment, (1991).

Transport Strategy for the Greater Dublin Area 2016 -2035 (NTA)

National Cycle Manual – National Transport Authority (June 2011)

Relevant Policy in South Dublin County Council Development Plan 2016 – 2022

Chapter 1 Core Strategy

Policy CS1 Consolidation Areas within Dublin City and Suburbs including Key Metropolitan Consolidation Areas

Policy CS2 Metropolitan Consolidation Towns

Policy CS6 Local Area Plans

It is the policy of the Council to prepare Local Area Plans as appropriate, and to prioritise areas that are likely to experience large scale residential or commercial development or regeneration.

Policy CS6 Objective 1: To prepare Local Area Plans for areas that are likely to experience large scale residential or commercial development or regeneration.

Policy CS6 Objective 2: To support a plan led approach in Local Area Plan areas by ensuring that development complies with the specific local requirements of the Local Area Plan, in addition to the policies and objectives contained in this Development Plan.

Chapter 2 Housing

Chapter 5: Urban Centres and Retailing

Policy UC6 Building Heights

It is the policy of the Council to support varied building heights across town, district, village and local centres and regeneration areas in South Dublin County.

Policy R1 Retailing Overarching

Policy R2 Sequential Approach

Chapter 6: Transport and Mobility

Section 6.3.0 Walking and Cycling

Policy TM3 Walking and Cycling

It is the policy of the Council to re-balance movement priorities towards more sustainable modes of transportation by prioritising

Section 6.4.3 Road and Street Design

Policy H12

It is the policy of Council to ensure that streets and roads within the County are designed to balance the needs of place and movement, to provide a safe traffic-calmed street environment, particularly in sensitive areas and where vulnerable users are present.

Section 6.4.4 Car Parking

Policy TM7 Car Parking

Chapter 7: Infrastructure and Environmental Quality

Section 7.1.0 Water Supply & Wastewater

Policy IE1 Water & Wastewater

It is the policy of the Council to work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote investment in the water and drainage network to support environmental protection and facilitate the sustainable growth of the County

Section 7.2.0 Surface Water & Groundwater

Policy IE2 Surface Water & Groundwater

It is the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.

Section 7.3.0 Flood Risk Management

Policy IE3 Flood Risk

It is the policy of the Council to continue to incorporate Flood Risk Management into the spatial planning of the County, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive.

Section 8.0 Green Infrastructure

Policy G1 Overarching

Policy G1 Green Infrastructure Network

Policy G3 Watercourses Network

Policy G4 Public Open Space and Landscape Setting

Policy G5 Sustainable Urban Drainage Systems

Policy G6 New Development in Urban Areas

Chapter 9: Heritage and Conservation

Section 9.0: Heritage, Conservation and Landscapes

Section 9.3.1 Natura 2000 Sites

Policy HCL12 Natura 2000 Sites

Section 10: Energy
Policy E4 Energy Performance in New Buildings

Section 11.2.0 Place Making and Urban Design

Section 11.2.1 Design Statements

Section 11.2.2 Masterplans

Table 11.17: Masterplan Considerations Section

11.2.7 Building Height

Section 11.3.1 Residential

(i) Mix of Dwelling Types

(ii) Residential Density

(iii) Public Open Space/Children's Play

(iv) Dwelling Standards

(v) Privacy

(vi) Dual Aspect

(vii) Access Cores and Communal Areas

(viii) Clothes Drying Facilities

Chapter 11: Implementation

Table 11.20: Minimum Space Standards for Houses

Table 11.21: Minimum Space Standards for Apartments

Section 11.4.1 Bicycle Parking Standards

Table 11.22: Minimum Bicycle Parking Rates

Section 11.4.2 Car Parking Standards

Table 11.24: Maximum Parking Rates (Residential Development)

Section 11.4.3 Car Parking for Electric Vehicles

Section 11.4.4 Car Parking Design and Layout

Section 11.4.5 Traffic and Transport Assessments

Section 11.6.1 (i) Flood Risk Assessment

Section 11.6.1 (ii) Surface Water

Section 11.6.1 (iii) Sustainable Urban Drainage System (SUDS)

Section 11.6.1 (iv) Groundwater

Section 11.6.1 (v) Rainwater Harvesting

Section 11.6.1 (vi) Water Services

Section 11.7.2 Energy Performance in New Buildings

Section 11.8.1 Environmental Impact Assessment

Section 11.8.2 Appropriate Assessment

Tallaght Town Centre Local Area Plan, 2020 – 2026

Chapter 1

Policy Context

Chapter 2 Urban Framework

Section 2.6 Intensity of Development

Section 2.6.1 Plot Ratio

Section 2.6.2 Height and Built Form

Section 2.7 Public Realm and Open Space

Chapter 3 Neighbourhoods

Section 3.5 Broomhill Neighbourhood

Land-use Mix / Urban Function: Predominantly business, enterprise and employment area with more mixed use residential development fronting along the southern side of Airton Road, subject to integrating effectively with existing surrounding uses.

Relevant Key Objectives in Broomhill:

BH1: Transition to mixed use area primarily focussed on higher value commercial uses.

Relevant Broomhill Specific Requirements

- Plot Ratio of 0.75 – 1.
- Building Heights:
 - Secondary Frontage: 4-6 Storeys residential, 3-5 storeys non-residential.
 - Other Frontages: 3-4 storeys residential.
- Enhanced public realm, including improved connectivity to public transport nodes.
- Upgrade / enhancements required to Airton Road in order to facilitate development within Broomhill, including public realm improvements, pedestrian and cyclist linkages.
- Childcare: The indicative long-term unit growth for the area would generate a requirement for 100 spaces. All new residential developments and particularly those in excess of a 10 minute walk-time from existing childcare facilities with sufficient capacity to accommodate that development, will be required to comply with the minimum childcare standards and the provision of childcare facilities as part of specific developments.

Chapter 5 Residential and Community

Section 5.2 Residential Development

Section 5.2.1 Housing Mix

Section 5.2.3 Dwelling Size, Internal Layout and Amenity Space

Section 5.3 Community Facilities

Section 5.3.2 Childcare Facilities

Section 5.3.3 Children's Playgrounds

Chapter 7 Climate Change Mitigation and Adaptation

Section 7.2.1 Green Infrastructure – Surface Water Management

Section 7.2.6 Green Infrastructure Strategy

Chapter 8 Implementation and Sequencing

The development of the identified regeneration lands at Cookstown and Broomhill alongside the Town Centre lands should generally be phased in accordance with the sequential approach:

- Development should extend outwards from the town centre and high-quality public transport with land closest to the centre and public transport nodes being given preference, i.e. ‘leapfrogging’ to stand alone or isolated areas should be avoided; and
- A strong emphasis will be placed on encouraging infill opportunities adjacent to compatible existing uses and ensuring better use of under-utilised lands (Objective IS 1).

Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved or where proposals are brought forward for sites of 2 hectares or more within the regeneration lands that comply with the Urban Framework of the LAP, the Planning Authority may consider that the proposal can establish its own identity and amenity in the transitional phase of the area. As such, subject to the nature and scale of the proposal and the delivery of the Urban Framework, in general, the Planning Authority will not consider such proposals to be isolated piecemeal development or premature. In this context, the Planning Authority will encourage integrated proposals and the amalgamation of proposals/landownerships. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal. The Council may, in certain cases, phase permitted development where this is considered necessary in order to ensure:

- i. an appropriate balance between employment, residential and service facilities (schools, shopping, community facilities etc.) and other uses that are required to increase the self-sufficiency of the area or particular neighbourhood; and
- ii. the delivery of infrastructural services in tandem with development, including water, sewerage and road infrastructure, that is required to safeguard the environmental quality and public safety of the area.

Section 8.2.1 Sequencing of Development in Regeneration Zoning

Section 8.3 Implementation and Funding

Section 8.4 Key Infrastructural Requirements/Sequencing

Chapter 9 Tallaght Specific Development Standards

Table 9.1 Design Criteria for Urban Square, public realm and local parks

Appendix 4: Community and Social Infrastructure Audit

ASSESSMENT OF PROPOSED DEVELOPMENT

Principle of Development

Zoning and Council Policy

The lands are zoned Objective ‘REGEN’ in the South Dublin County Development Plan, *‘to facilitate enterprise and/or residential led development’*.

The proposed development is predominantly residential, with a café and a creche also provided. Private facilities for the use of residents only are proposed within the site.

Local Area Plan and Neighbourhood Function

The site is located in the Broomhill Neighbourhood of the LAP. The LAP provides the following description/objective for ‘Broomhill’:

“An attractive consolidated, diversified and intensified place for business and employment that is better connected to surrounding places. Emerging residential uses along the southern side of Airton Road.”

The land use / urban function is described as *“Predominantly business, enterprise and employment area with more mixed use residential development fronting along the southern side of Airton Road, subject to integrating effectively with existing surrounding uses.”*

The subject site is located in the middle of the Broomhill neighbourhood, and is surrounded on all sides by commercial, industrial or light industrial uses. The subject site is located to the north of the Airton Road.

The proposed mix of uses by being predominantly residential contravenes this objectives for the neighbourhood area set out in Section 3.5 of the Tallaght Town Centre Local Area Plan 2020 - 2026.

South Dublin County Development Plan 2022 – 2028

The new South Dublin County Development Plan 2022 – 2028 will come into effect on 3rd August 2022. At the time of preparing this report the new Plan was not in place and therefore the development has been assessed based on the policies and objectives of the 2016 – 2022 Plan.

Under the new 2022 – 2028 Development Plan, the site will remain zoned ‘REGEN’ – *‘To facilitate enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery.’* It is noted that the land use zoning objective for REGEN has changed, incorporating the requirement for a plan or framework to be in place to facilitate regeneration in an area. It is noted the Tallaght LAP will still be effective on adoption of the Development Plan. The Tallaght Town Centre Local Area Plan 2020 – 2026 is considered to be the above referenced ‘development framework or plan’ in relation to the subject site. The forthcoming 2022-2028 CDP makes specific reference to this LAP (given it was developed after the adoption of the 2016-2022 CDP).

In relation to the development of the Cookstown and Broomhill Industrial estates, the Plan states that *‘ensuring that the development of such areas is planned and co-ordinated in a manner which is capable of delivering successful and sustainable new neighbourhoods is a key objective of this plan.’* This is a critical consideration in determining this application, based on the long-term vision for the Broomhill area. This site is the first in the area to be brought forward for such development and would set the precedent for future sites. Ensuring the planning and co-ordinated development of this area will be key to ensuring the long-term sustainability of the area, in accordance with the Development Plan and LAP objectives.

While this application has not been assessed against the plans and objectives contained within the forthcoming development plan, it should be noted that an objective has been included requiring new developments to provide a minimum of 30% 3-bedroom units unless certain criteria are met (H1 Objective 13). A similar objective is in the Tallaght LAP.

Height, Plot Ratio, Unit Mix, Land Use Mix/Urban Function and Sequencing of Development

The applicant has supplied a Material Contravention Statement in which they conclude that the proposed development is a material contravention of the Tallaght Town Centre Local Area Plan (LAP) 2020 in relation to building height, plot ratio, housing mix and land use mix/urban function. SDCC concurs that the proposed development would represent a material contravention on these issues.

Intensity of Development

Section 2.8 'Development Capacity' of the Local Area Plan provides for a long term indicative development potential of 11,100 units (high), and a non-residential capacity of 1.02m sqm (high) across the Local Area Plan lands.

The LAP provides general standards for height and plot ratio, and also provides criteria for building beyond those standards. Density is therefore formally managed with reference to height and plot ratio. This approach places increased emphasis on meeting the plot ratio and height parameters in the LAP.

Height

The height strategy of the LAP provides for building heights along secondary routes/frontages of 4-6 storeys for residential development. The development provides for a maximum of 7 storeys along Broomhill Road, tapering to 4 – 5 storeys at the eastern part of the site. Based on the overall urban structure from the LAP (Figure 3.13), the boundary of the site would be in the middle of a larger block envisaged for the area. The figure below indicates the heights of the proposed blocks and how they correlate with the height ranges specified in the LAP. It is clear from this figure that around the majority of the boundary of the site, buildings exceed the height range by 1 storey.



As stated at Stage 2, the opinion of the Planning Authority was that the proposed height of the development should be reduced to match the standards of the LAP. The applicant has not amended the height of any of the blocks on foot of this consultation.

As previously relayed to the Board, the Tallaght Town Centre Local Area Plan 2020 - 2026 was adopted after the introduction of the 2018 guidelines on building height, complies with its design- and environment-led approach, and has been approved by the OPR (Office of the Planning Regulator). The Plan is consistent with the s.28 guidelines.

The proposed development breaches the height requirements of the Plan.

The LAP includes flexibility in relation to provision of higher buildings above the LAP requirements. The criteria for taller buildings is set out in Section 2.6.2. This provision may apply where the site is directly adjacent (100 m walking distance) to the following:

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

The subject site is not identified as a landmark site suitable for higher development under the LAP and does not meet the criteria of Section 2.6.2 of the LAP.

In the event of a grant of permission, a **condition** is recommended to restrict the height of the development to a maximum of 6 storeys, in line with the provisions of the adopted Local Area Plan.

As the height of the development, without alteration, represents a contravention of the adopted Local Area Plan the Planning Authority recommends **refusal** on this basis.

Plot Ratio

The LAP provides for a plot ratio range of 0.75 – 1.0 within the Broomhill Neighbourhood. The proposed plot ratio is given as 1.6, 60% above the allowable standard.

As stated at Stage 2, this is the first site within the Broomhill area to come forward for development, with every site in the precinct considered to be a potential regeneration site. Permitting development at the proposed plot ratio of 1.6 would set a precedent for additional intensity in the area and could have significant consequences for the quality of public realm, streetscapes, and public/communal amenity spaces on this and other sites in the area.

Section 2.6.1 of the LAP states that flexibility in relation to the plot ratio may be applicable if the increased density will result in a significant public gain, including public space above the minimum 10%. In this instance, public space is proposed at the minimum rate of 10% and it is not considered that any other significant public gain arises out of the additional density and height at the site.

The plot ratio represents a contravention of the adopted LAP and the Planning Authority recommends refusal on this basis.

Unit Mix

Objective RE2 of the LAP requires a minimum of 30% of units within any new residential development to have 3 bedrooms. The proposed development provides 5 no. 3-bedroom units, accounting for 2.1% of the total units proposed.

Land Use Mix/Urban Function

Section 3.5 sets out a vision for the Broomhill Neighbourhood to be a *'predominantly business, enterprise and employment area with more mixed use residential development fronting along the southern side of Airton Road, subject to integrating effectively with existing surrounding uses'*. The proposed development seeks to provide 242 no. units with a café (50.9 sqm) and other miscellaneous residential and public amenities, including a public gym and co-working space. The development is therefore predominantly residential and would not accord with the vision for the Broomhill Neighbourhood.

Key Objective BH1 states the objective for the area to *'transition to mixed use area primarily focused on higher value commercial uses'*.

The applicant is proposing 242 no. apartment units, a 465 sq.m creche and 50.9 sq.m café as well as residential amenity areas including; reception, resident lounge, letting office, rentable room/studio space, public gym and public co-working space. These uses are considered to be ancillary to the main residential element of the development and do not represent the overall aim of the Broomhill Neighbourhood to be a predominantly enterprise and employment area. The vision for the Neighbourhood clearly identifies the southern side of the Airton Road as the location for mixed use residential development.

It was stated at Stage 2 that *'It is the opinion of the Planning Authority that the proposed mixed of uses is inappropriate and contravenes the objectives for the neighbourhood area set out in section 3.5 of the Tallaght Town Centre Local Area Plan 2020 - 2026.'* These concerns have not been suitably addressed.

Based on the above, it is the opinion of the Planning Authority that the proposed predominantly residential development does not accord with the aim of the area to transition to a more mixed use area, and for residential development to be focused along the southern side of the Airton Road. The Planning Authority therefore considers that the proposed land use mix/urban function is a contravention of the adopted LAP and recommends refusal.

Sequencing of Development

It was raised at Stage 2 that the Planning Authority considered that the development of these lands as proposed would contravene objective IS 1 of the LAP which states the following:

It is an objective of the Council that development within the plan area is undertaken in an orderly and sustainable manner. The development of the identified regeneration lands at Cookstown and Broomhill alongside the Town Centre lands should generally be phased in accordance with the sequential approach:

- *Development should extend outwards from the town centre and high-quality public transport with land closest to the centre and public transport nodes being given preference, i.e. 'leapfrogging' to stand alone or isolated areas should be avoided; and*
- *A strong emphasis will be placed on encouraging infill opportunities adjacent to compatible existing uses and ensuring better use of under-utilised lands*

The LAP sets out only very specific circumstances under which the principles of objective IS 1 could be contravened, limited to instances of a barrier to development or on sites over 2ha. The applicant has not provided a rationale for 'leapfrogging' the sequencing schedule and this is not addressed in the Material Contravention Statement provided.

The LAP states *'the purpose of the sequencing requirements is to ensure that a minimum level of infrastructure, facilities and amenities are provided together with new residential development.'* The proposed development is predominantly residential, with ancillary uses including a creche, café and public gym. It is not considered that these represent a minimum level of infrastructure, facilities or amenities required to serve a new residential community at the site, which it is noted is identified for employment rather than residential use. In this regard, it is the opinion of the Planning Authority that the proposed development would contravene Objective IS 1 of the Tallaght

Town Centre LAP 2020 and the objective of delivering new residential development in tandem with social infrastructure.

Mix of Uses

The applicant seeks to provide a creche (465 sqm), a café (50.9 sqm), public gym (128.5 sqm) and public co-working space (128.4 sqm), along with other ancillary residential amenity spaces including a resident lounge and letting office. These facilities are considered acceptable at this site however, as stated above, the vision of the Broomhill Neighbourhood is focused on being an intensified place for business and employment, with emerging residential uses located along the southern side of the Airton Road. In this regard, the mix of uses proposed is not considered to be sufficient and, as previously stated, is considered by the Planning Authority to represent a material contravention of the LAP.

The LAP notes the need for 100 childcare spaces in this neighbourhood in line with projected population growth. The proposed facility would provide 134 no. childcare spaces, exceeding the anticipated long-term unit growth for the area. While the Planning Authority would support the provision of childcare spaces to cater for existing and emerging residential communities, the scale of this facility further suggests the proposal does not accord with the LAP vision and would be inappropriate.

Taking in Charge

The applicant has not provided a taking in charge plan, stating in their Response to the ABP Opinion that no areas are proposed to be taken in charge, noting that the courtyard area will be made fully available to the general public for use throughout the day.

It is considered necessary that a **condition** should be attached in the event of a grant ensuring that the public open space is always fully accessible, with no gates or other boundary features to be erected that would impact on the ability of the public to use the central courtyard area.

Visual Impact, Design, Character and Layout

The development would provide 5 apartment blocks, comprising 4 buildings arranged around a central amenity space. Each apartment block has tapered edges, angled to create throughways to the central courtyard. Surface level car parking is provided along the southern and eastern site boundaries.

At Stage 2, the Planning Authority raised the following concerns:

- The provision of triangular living spaces within the edges of tapered buildings may wish to be reconsidered
- The perimeter street on which all parking is located was a concern due to:
 - Lack of contribution to permeability/connectivity with adjoining future development sites – preference for this road to be taken in charge and not private
 - Lack of own door ground floor units onto the perimeter street and central courtyard
- Unclear if central space is communal or public
- Boundary treatments should be limited by condition

The concerns of the Planning Authority in relation to all of the above points do not appear to have been addressed in the final application. The Planning Authority would continue to have a concern about the lack of street activity along the perimeter street and the impact this layout would have on future permeability and connections.

Building Height

The apartment blocks would range from 4 – 7 storeys in height, tapering from a maximum height of 7 storeys fronting Broomhill Road to the west to 4 – 5 storeys at the east of the site. This transition in height is considered appropriate to increase light into the centre of the development and accords with the trend set down in the adopted LAP for this site.

The Planning Authority stated at Stage 2 that, as this is the first site to come forward for development in the Broomhill Neighbourhood, the height standards set down in the LAP should be followed. It is noted that the LAP was adopted after the introduction of the 2019 Height Guidelines and has been approved by the Office of the Planning Regulator (OPR). The heights applied in the LAP are therefore considered to be acceptable to enforce and the Board should have regard to this in reaching their decision.

Connectivity

The Board requested that the applicant provides drawings and documents demonstrating future connections to adjoining lands, specifically to the south and east. The site layout plan shows a single potential future access point to the eastern lands, with both the southern and eastern boundaries of the site comprising car parking. It is therefore not considered that the applicant has adequately made an attempt at providing sufficient future connections to neighbouring lands, impacting the future permeability and redevelopment of the area. As previously stated, and as stated at Stage 2, the perimeter street is likely to negatively impact connectivity to future adjoining development lands and would restrict the ability to integrate with neighbouring sites and enhance permeability through the Broomhill neighbourhood.

Cyclists

At Stage 2 the Roads Department requested the applicant to include proposals to improve cycle facilities along Broomhill Road. The submitted scheme does not make provisions for any such upgrades, stating there is no reason to provide a cycle lane at this location at present. Given the applicant is relying on a reduced number of car parking spaces to serve the development, accommodations must be made to encourage and facilitate alternative modes of transport.

Safety

A Road Safety Audit has been prepared and submitted as part of the application. This audit flags several concerns with the perimeter road including a lack of traffic calming measures, lack of pedestrian access from the boundary car parking spaces across the perimeter road into the main development, lack of clarity on the width of pavement along Broomhill Terrace and footpath links to carriageway edge along Broomhill Road. It does not appear that these issues have been addressed in the final submission. A **condition** should be attached in the event of a grant requiring a revised site layout plan clearly detailing how these safety issues have been addressed, for the written agreement of the Planning Authority.

Residential Amenity

Internal Residential Layout

The HQA (Housing Quality Assessment) provided with the application appears to show that all units meet the minimum requirements under the 2020 '*Sustainable Urban Housing: Design Standards for New Apartments*'.

Section 3.8 'Safeguarding Higher Standards' of the Guidelines requires 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%*'. With regard to compliance with section 3.8, it appears on inspection that approximately 60% of the development exceeds the minimum floor area requirements by 10% and therefore section 3.8 is satisfied.

The Planning Authority would have concerns about the amenity of unit C-0.01 at the ground floor of Block C. Bicycle parking is proposed almost immediately outside the bedroom window. These 6 no. spaces should be relocated so as not to negatively impact on the privacy and amenity of this unit.

Sunlight and Daylight

The applicant has submitted an assessment of the Average Daylight Factor (ADF) for the proposed apartments. In their report, they state that the ADF of all habitable rooms across the ground and first floors of the proposed development have been assessed. The report concludes that the ADF in all habitable rooms meets or exceeds the appropriate target values. This is considered acceptable.

With regard to external space, SDCC Public Realm noted at Stage 2 that there some concerns regarding the potential impact of overshadowing of the public open space as a result of the taller buildings. These concerns are repeated in their report for this Stage 3 application.

The applicant has provided a Daylight and Sunlight Assessment which concludes that outdoor amenity areas would meet the criteria as set out in the BRE Guidelines (>50% receiving 2 hours of sunlight at equinox), suggesting that outdoor amenity areas would be capable of receiving adequate levels of sunlight throughout the year. This is considered to be acceptable.

Single and Dual Aspect

The HQA indicates that 190 units are dual aspect. This would equate to approximately 78% of the development. The Planning Report states that at least 117 units are dual aspect (49%), with a further 59 units benefiting from a projecting bay window for 'enhanced single aspect'. The additional 59 units would not be considered relevant in the calculation for dual aspect units. The Planning Authority agrees with the Planning Report that 117 of the 242 units would be dual aspect. This figure is short of the 50% requirement in Section 3.17 of the 2020 Guidelines. As stated at Stage 2, it is considered that a new development on a site of this size should comply with the recommendation that a minimum of 50% of units shall be dual aspect.

Overlooking and Privacy

For the majority of the development, it appears that due consideration has been given to the orientation of units to ensure appropriate separation distances are maintained between units to protect the privacy of habitable rooms. The tapering of the buildings is effective at achieving this.

It is noted that there is only 15.3m between Block A and Block E. From floor plans it appears that there would be living rooms in Block E directly looking into bedrooms of Block A. The distance between these rooms would not meet the requirement of 22m to be provided between above ground directly opposing habitable rooms, as per Section 11.3.1(v) of the Development Plan 2016 – 2022. It is not considered that an innovative design solution has been proposed in this instance to reduce the required separation distance. This would not be acceptable, and a **condition** should be applied in the event of a grant requiring the redesign of these units to better protect the privacy and amenity of future occupants, either by internal or external alterations to limit the number of directly opposing windows serving habitable rooms.

Discrepancies

There appears to be discrepancies between the floor plans and elevations across the site, for example, Block E; fenestration to the Type 2A apartments is not consistent. It is noted that the applicant has provided floor plans across the whole site in ranges, e.g first-third floor. Elevations show minor differences in balcony locations and designs meaning this grouped format is not appropriate as not all floors have been designed identically within blocks. It is noted that, even where individual floor plans have been provided, there are still discrepancies, e.g fourth floor Block B&C, the floor plans and elevations are not consistent.

On the basis of these discrepancies, a full assessment of the scheme cannot be undertaken as the floor plans and elevations for each building have not been provided accurately. In the event of a grant, a **condition** should be attached requiring floor plans and elevations for each block separately, rather than all documentation being provided at a site level. This is necessary to ensure that any construction work undertaken is in fact in accordance with the submitted plans and particulars.

Private Amenity Space

The Housing Quality Assessment (HQA) appears to show that all units are provided with adequate private amenity space. Given the above concerns regarding the accuracy of drawings provided, there is some doubt as to the accuracy of the HQA provided. A revised version should be requested by **condition** in the event of a grant, confirming all final site statistics.

Communal and Public Amenity Spaces

The Planning Authority stated at Stage 2 that the design of the development was broadly acceptable, noting that it was unclear if the central space is communal or public open space.

The *‘Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities’* (2020) state that communal amenity space should be provided as distinct from public amenity space. In this regard, there does not appear to be a clear delineation between the public and communal amenity areas, and these would likely be viewed as interchangeable once in operation. The below plan shows the allocation of communal and public open space within the development. The roof terraces would provide separated communal open space, accounting for

567.3 sq.m of the 1,797.4 sq.m the applicant states is being provided. The Planning Authority would have a concern that some of the areas stated as communal open space are incidental and would not provide much function in practice, noting the small area at the east of the site adjacent to the mobility parking spaces in particular.



The LAP states developments will be required to ensure interaction between residential and public realm elements of a scheme, stating this can be ensured through utilising opportunities for animated ground floors with own door access, private landscaped terraces and integration with communal and public open space. While own door access has not been utilised, the integration of public and communal open space has been incorporated into the proposal. The Planning Authority is satisfied that the majority of the open spaces, both communal and public, would be well overlooked by the apartments and other uses.

The Public Realm Section is generally supportive of the central courtyard area being open to the public but raises concerns about the function of the space and concerns regarding the potential impact of overshadowing and wind tunnelling created by the tall buildings. It is noted that the applicant has tapered the buildings to the south and east of the site to maximise daylight into the site and this is considered acceptable.

The combined communal and public open space is acceptable in principle, subject to the safeguarding of access to the public open space area at all times. This can be done by **condition**. In the event that ABP consider that the central space will form only communal open space, attention is drawn to the option of a condition requiring a special contribution in lieu of open space in the LAP and SDCC Contribution Scheme.

Unit Mix and Tenure

The applicant confirmed at Stage 2 that this scheme is proposed as build to sell. The Planning Authority can generally support the provision of 100% build-to-sell developments, notwithstanding issues in principle with residential-only development at this site.

It is noted that some residential amenity spaces are provided, including a lettings office, and it is considered likely that rental will form part of the scheme once constructed however, the relaxation of some standards facilitated by the Apartment Guidelines has not been used in the design of the scheme. The proposed unit mix is as follows:

Unit Type	No.	Percentage
1 Bedroom Apartment	96	39.7%
2 Bedroom Apartment	141	58.3%
3 Bedroom Apartment	5	2.1%
Total	242	100%

Objective RE2 of the Tallaght LAP states it is Council policy *‘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.’* The **unit mix falls significantly short of this objective for 30% of new development to be 3 bedrooms.** While this was not included in the applicants Material Contravention Statement, the unit mix clearly contravenes this objective and, as stated at Stage 2, would undermine the formation of a sustainable residential community in this area, while also failing to meet local housing need. The **provision of only 2%** is significantly below the level required by the LAP and is not a sustainable approach to regeneration and the creation or facilitation of sustainable residential communities.

It is further noted that, as stated at Stage 2, the LAP, as reviewed by the Office of the Planning Regulator (OPR), provides for a minimum of 3-bed units to serve local demand as assessed during the drafting of the Plan – i.e., the process sought within the ‘Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities’ (2020) for Planning Authorities to determine appropriate housing mixes. The 2020 guidelines were adopted in 2018, prior to the adoption of the Tallaght Town Centre LAP. The 2020 changes to ‘shared accommodation’ are irrelevant to this scheme.

Based on the above, the unit mix is not considered to be acceptable.

Housing (Part V)

The Housing Department has submitted a report (located at Appendix 6) which specifies that the Planning Authority would seek to acquire a mixture of units on site in the event of a grant of permission, in order to resolve the requirements of s.96 of the Planning and Development Act 2000 as amended.

Public Realm and Ecology

Public Realm

The Public Realm Department has submitted a report (appended to this report). The main concerns are as follows:

- Greater level of detail required regarding proposed play provision to be provided within the development.
- Greater level of detail required regarding the tree pits and SUDS features to be provided within the development.
- Greater level of detail required in terms of soft and hard landscaping to be provided within the development.
- Detailed taking in charge drawing to be provided

The Public Realm Department recommends **conditions** relating to the following:

- Landscape Design Proposals – to be agreed prior to commencement of development
 - Works to be carried out in accordance with submitted Landscape Design Statement
 - Details of hard landscaping materials
 - Public furniture/benches details
 - Proposed location of trees
 - Cross section details of tree pits and how these will function
 - Additional play equipment
 - Levels on landscape plans
 - Details of soft landscape design
- Retention of Landscape Architect
- Landscape Management and Maintenance – plan to be implemented in full
- Pedestrian Access – access to public open space to be permanent 24 hours a day
- Play Provision – clarification on proposals
- SuDS – comprehensive SuDS Management and Maintenance Plan
- Green Roofs – details to be agreed prior to commencement
- Rooftop Gardens / Terraces – details to be agreed prior to commencement
- Taking in Charge – areas not to be TIC to be maintained by a legal management company
- Ecological Impact Assessment Report – measures and mitigation to be implemented in full

The conditions are considered to be appropriate.

Ecology

The applicant has provided a Bat Assessment which concludes the development will have an imperceptible impact on named bat species and Ecological Impact Assessment which concludes the residual impacts associated with the development are not considered significant

An Arboricultural Impact Assessment has been provided concluding there will be a moderate impact on 11 trees and 1 hedgerow tree as a result of the development.

The mitigation measures recommended in these reports should be undertaken by the applicant and should be ensured by way of condition in the event of a grant to ensure any potential impacts on ecology at the site are minimised.

Access, Transport and Parking

The SDCC Roads Department has provided detailed observations of the proposal relative to the points raised in An Bord Pleanála's Opinion Report from Stage 2. The summary observations are below (the full report is appended to this report):

1. A masterplan is required to ensure a coordinated approach to the proposed development. It is important to understand how the design will fit in relation to future neighbouring developments. It is important to maximise the pedestrian, cyclist, and vehicular permeability throughout the site and to the wider masterplan area. A design of the road, footpath and cycle lane for the development in line with the LAP for Tallaght is required.
2. The car parking size should be 5.0m x 2.5m with 6m reversing distance to help access and egress from the parking spaces. Prior to construction a revised layout showing parking spaces of 2.5m x 5.0m must be agreed in writing with the roads department and a copy filed with the planning department.
3. Bicycle parking provision is to be to 2018 Apartment Guidelines which is satisfactory. However, all spaces including visitor spaces are recommended to be covered spaces to encourage this mode of travel.
4. The applicant shall comply with the recommendations of the stage 1 Road safety audit for the proposed development. And submit layout plans showing the changes.
5. A Mobility Management Plan is to be completed within six months of opening of the proposed development. The Mobility Management Plan shall be agreed in writing with the roads department and the agreed plan, along with the written agreement of the roads department shall be lodged to the planning file. The written commitment of the developer to implement the agreed plan shall also be lodged to the file. REASON: In the interest of sustainable transport.
6. The management of bin storage needs to be set out clearly. The noted waste collection area at the north of the development west of Block A needs to be clarified.
7. The cycle access between Broomhill Terrace and Airton Road shall be improved. As to provide a segregated cycle lane to link with the Cycle South Dublin proposals on Airton Road.
8. Prior to commencement, SDCC will require a public lighting scheme to be agreed with South Dublin County Council Lighting Department.
9. All items and areas for taking in charge shall be undertaken to a taking in charge standard. Prior to development the applicant shall submit construction details of all items to be taken in charge. No development shall take place until these items have been agreed.
10. Prior to commencement a developed Construction Demolition and Waste Management Plan shall be agreed by SDCC and lodged on the planning file.
11. The footpath at the existing entrance is to be continued and made good when the access point is closed. The footpath and grass verge shall match the existing and in line with SDCC taking in charge standards.
12. The proposal shall include the upgrade of local cycle facilities along the frontage of the site.

The above is noted, and the points raised should be the subject of a **condition of permission**.

Furthermore, the Roads Report notes the following key points:

- The applicant has submitted details of the permeability within their development, but a wider scope detailing improvements surround the development would be required.
- The applicant has shown an autotrack of a refuse/fire vehicle entering and exiting the development. The autotrack for the large car entering a parking space details the vehicle passing through a building. The turning area shown in the autotrack for fire tender and refuse trucks will also be used by vehicles when all parking spaces are occupied. The drivers will use this area for turning, this area is shown as pedestrian on the drawings, it may be safer to provide a dedicated turning point at this location.
- The cycle links are not clear. A cross section and plan detailing dedicated cycling provision on Broomhill Road linking to Airton Road should be provided. A cross section and plan detailing the cycling provision along Broomhill Terrace along the applicant's northern boundary should be provided.
- It is not clear from the applicant's drawings if the footpath along Broomhill Road and Broomhill Terrace will be public or private. If the applicant is upgrading or installing infrastructure into the public realm then this should be identified, and if necessary, details of the construction to taking in charge standards.
- The applicant has stated that there is ample road width to provide a cycle path in the future but have no logical reason to provide such a cycle lane at the moment. The applicant has depended heavily on a reduced car dependent development and suggested alternative modes of transport, one such mode is cycling, it is therefore prudent to provide a dedicated cycle link to the wider cycle network. The closest link will be the proposed Cycle South Dublin network on Airton Road, it is reasonable to request the applicant to provide a link to this infrastructure.
- There is some scope for a car sharing scheme, but no details are provided. The crèche and other commercial areas have no dedicated parking/set down spaces identified.

The Planning Authority note the concerns of the Roads in relation to a masterplan and linking in to the adjacent lands. It is considered that the LAP provides an urban design framework for the area. Concerns are expressed in relation to the car parking and that area are not offered for taking in charge. This impacts on the delivery of the LAP. The cycle link is acknowledged as key. The absence of the link is not considered to warrant an individual refusal, however, in the event of a grant, it is recommended that a condition be attached requiring same.

DMURS

The applicant has provided a DMURS design statement detailing the internal road layout, pedestrian walkways and the visibility splay at the vehicle access which is stated to be a priority-controlled junction. The Roads Department hasn't stated an issue with the DMURS design statement however, they have requested the applicant submit details of the priority-controlled junction layout and any proposals to alter the road markings at this location. This should be a **condition** of any grant of permission.

Parking

The SDCC Roads Report notes that car parking is below the maximum standards in the SDCC County Development Plan. This approach is supported to encourage the use of sustainable modes of transport and reduce the reliance of private vehicles. 136 no. car parking spaces would be provided at a ratio of 0.56 per unit.

It is noted that bicycle parking is provided at a rate in excess of the Development Plan standards but below the recommendations of the 2020 Apartment Guidelines. 426 no. bicycle spaces would be provided, 308 dedicated to the residential units, located in secure areas, and 118 no. visitor spaces, located externally at surface level. An issue has been raised regarding the location of the 6 no. surface level bike spaces proximate to the café and natural play area. These spaces should be relocated so as not to impact the privacy and amenity of the ground floor apartment at this location.

In general, the Planning Authority does not have an issue with the quantum of car or bicycle parking proposed at the site. As previously stated, there is a concern about how the perimeter parking will impact the long-term integration of adjoining development sites and a lack of street level activity along these pedestrian routes due to the omission of any ground floor own door units.

Water

The Water Services Department have stated no objection to the development. Their report provides the following guidance:

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

These should be noted by the developer as standard practice in completing the development in the event of a grant.

SUDs

The Public Realm Section welcomes the incorporation of extensive green roofs but state a preference for the provision of intensive green roofs with access to these areas to be facilitated for residents as additional communal open space. This would be considered appropriate given the majority of open space at ground floor, although designated on drawings separately as public and communal, would function as entirely public open space.

The Public Realm section has stated satisfaction at the inclusion of; extensive green roofs, permeable surfacing, tree pits and bioretention areas. They recommend the applicant is requested to submit a comprehensive SUDS Management Plan to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan should also be provided to demonstrate how the system will function following implementation.

Water Services have not raised any concerns regarding the SUDS measures proposed.

In the event of a grant, it is considered that **conditions** requiring the provision of a greater extent of intensive green roofs, a SUDS Management Plan and a SUDS Maintenance Plan would be appropriate to ensure the provision and management of effective SUDS as part of the development.

Screening for Appropriate Assessment

The Board is the competent authority and will screen the development for appropriate assessment. The applicant has provided a Screening report.

Screening for Environmental Impact Assessment

The Board is the competent authority and will screen the development for EIA. The applicant has provided an EIA Screening Report.

Conclusion

The proposed **mix of uses by being predominantly residential contravenes the objective for the neighbourhood area** set out in section 3.5 of the Tallaght Town Centre Local Area Plan 2020 – 2026 which specifies the land use / urban function for this area as “**Predominantly business, enterprise and employment area with more mixed use residential development fronting along the southern side of Airton Road, subject to integrating effectively with existing surrounding uses.**”

Furthermore, in terms of building height, unit mix and plot ratio, the development would exceed the maximum thresholds of the Tallaght Town Centre Local Area Plan 2020. The LAP is an urban design led planning framework for the area and it is the recommendation of the Planning Authority that proposed developments that contravenes the requirements, objectives and vision of the Plan be refused. A plan led approach to regeneration is in accordance with the proper planning and sustainable development of the area.

Recommendation

Refuse permission, for the reasons set out below.

1. The proposed development would contravene the Tallaght Local Area Plan 2020 because the proposed **mix of uses, by being predominantly residential, contravene the objective for the neighbourhood area** set out in section 3.5 of the Tallaght Town Centre Local Area Plan 2020 – 2026 which specifies the land use / urban function for this area as “**Predominantly business, enterprise and employment area with more mixed use residential development fronting along the southern side of Airton Road, subject to integrating effectively with existing surrounding uses.**”
2. The proposed development would materially contravene objectives of the Tallaght Town Centre Local Area Plan 2020 relating to the following matters:
 - Height
 - Plot Ratio

- Unit Mix
- Land Use Mix/Urban Function
- Sequencing of Development

The proposed development does not provide sufficient opportunities for future integration with adjoining development lands, impacts the long-term masterplan vision of the area, as contained in the LAP, and the permeability and connectivity of sites within the immediate urban block. The proposed development is contrary to the proper planning and sustainable development of the area.



Jim Johnston,
Senior Executive Planner



Eoin Burke,
Senior Planner

Date: 11/7/22

Appendix 1: Conditions of Permission

No	Condition	Reason
1	<p>Effective control on development as approved</p> <p>Development in accordance with submitted plans and details. The development shall be carried out and completed in its entirety fully in accordance with the plans, particulars and specifications lodged with the application, save as may be required by the other conditions attached hereto.</p>	<p>To ensure that the development shall be in accordance with the permission and that effective control be maintained.</p>
2	<p>Amendments</p> <p>Prior to commencement of development, the applicant developer or land owners shall obtain the written agreement of the Planning Authority to various amendments to the scheme and the final arrangements and layouts associated with those amendments, which shall include the following:</p> <ul style="list-style-type: none"> a) Plans and Elevations <p>Accurate and consistent plans and elevations shall be submitted for each floor and each block individually. In providing these drawings, consideration should be had for those units in Block A and E where there is a separation distance of less than 16m. Fenestration should be altered to limit the direct overlooking of habitable rooms to ensure the privacy and amenity of future residents. In addition, any opportunity to increase the number of units with dual aspect shall be taken. These plans must be agreed with the Planning Authority prior to the commencement of development.</p> b) Housing Quality Assessment (HQA) <p>The applicant shall submit a revised HQA accounting for any changes to areas, private open space and dual aspect units that arise as a result of compliance with 2a. The revised HQA shall accurately detail the correct number of units that are truly dual aspect, not including units with projecting bay windows.</p> c) Heights <p>The heights of Blocks A, B, C and D shall be reduced to accord with the maximum height range as specified in the LAP. Block A shall be no more than 4 storeys in height and Blocks B, C and D shall be no more than 6 storeys in height.</p> d) Access to Open Space <p>The internal courtyard comprising public open space shall be accessible to all members of the public 24 hours a day, 7 days a week. There shall be no physical boundaries or gates erected that would</p> 	<p>In the interest of delivering a high quality sustainable residential development, carried out in accordance with accurate and consistent plans, maximising residential amenity in accordance with the policies and objectives of the Tallaght Town Centre Local Area Plan 2020 and relevant County Development Plan.</p>

No	Condition	Reason
	<p>impact accessibility to this space or the streetscape as shown in the application documentation. No boundaries, barriers, gates or other similar shall be allowed without a prior grant of permission.</p> <p>e) Bike Parking The 6 no. bicycle parking spaces located outside the bedroom window of ground floor unit C-0.01 of Block C shall be relocated so as not to impact on the privacy and amenity of this residential unit.</p> <p>f). The cycle access between Broomhill Terrace and Airton Road shall be improved so as to provide a segregated cycle lane to link with the Cycle South Dublin proposals on Airton Road. The proposal shall include the upgrade of local cycle facilities along the frontage of the site. A revised proposal shall be designed, agreed with PA in writing and implemented as part of the permission.</p> <p>Note: all references to unit numbers and street numbers are as per Site Layout Plans, Landscape Masterplan or Road layout Plan unless otherwise stated.</p> <p>Note: Compliance with this condition may require a reduction in units.</p>	
3	<p>Ecological Impact Assessment Report The recommendations and mitigation measures contained within the Ecological Impact Assessment Report prepared by MWP shall be implemented in full by the applicant.</p>	<p>To protect and enhance areas of biodiversity, in accordance with policies IE7 Objective 5, G3 Objective 2, G4 Objective 2, HCL15 Objective 3, and other policies relating to Biodiversity within the CDP 2016-2022.</p>
4	<p>Taking in Charge Prior to commencement of development, the applicant shall submit and obtain agreement of the Planning Authority (following consultation as necessary with the SDCC Public Realm Department and the SDCC Roads Department) a taking-in-charge plan, clearly identifying whether the footpath along Broomhill Road and Broomhill Terrace will be public or private. Prior to development the applicant shall submit construction details of all items to be taken in charge. All areas not intended to be taken in charge by the local authority, shall be maintained by a legally constituted management company.</p>	<p>To comply with the Councils taking in charge standards.</p>

No	Condition	Reason
	<p>All areas to be taken in charge shall be completed as per the council's standard details, which can be found at: https://www.sdcc.ie/en/services/planning/commencement-and-completion/completion/taking-in-charge-policy-standards/</p>	
5	<p>Roads The following details shall be agreed with the Planning Authority in writing prior to commencement of development:</p> <ul style="list-style-type: none"> a) The car parking size should be 5.0m x 2.5m with 6m reversing distance to help access and egress from the parking spaces. Prior to construction a revised layout showing parking spaces of 2.5m x 5.0m must be agreed in writing with the planning authority. b) All bicycle spaces including, visitor spaces, shall be covered to encourage this mode of travel c) The applicant shall comply with the recommendations of the Stage 1 Road Safety Audit for the proposed development. A revised site layout shall be submitted and agreed with the Planning Authority clearly incorporating all of the recommendations of the Road Safety Audit. d) The management of bin storage needs to be clearly defined. The noted waste collection area at the north of the development site, west of Block A, needs to be clarified and agreed in writing with the PA. This area shall not be used for refuse collection from Broomhill Terrace. e) Prior to commencement, SDCC will require a public lighting scheme to be agreed with South Dublin County Council Lighting Department. f) The footpath at the existing entrance is to be continued and made good when the access point is closed. The footpath and grass verge shall match the existing and in line with SDCC taking in charge standards. 	<p>To ensure effective control of development, and to ensure safe and adequate provision of transport infrastructure in line with national guidelines and local needs.</p>
6	<p>Mobility Management Plan. A Mobility Management Plan is to be completed within six months of opening of the proposed development. The Mobility Management Plan shall be agreed in writing with the roads department and the agreed plan, along with the written agreement of the roads department shall be lodged to the planning file. The written commitment of the developer to implement the agreed plan shall also be lodged to the file.</p>	<p>In the interest of sustainable transport.</p>
7	<p>Aviation Safety The applicant shall liaise with the Department of Defence and the Air Corps prior to commencement of development and provide the Planning Authority with any written notice by the Department and Air Corps that alterations to the development are sought.</p>	<p>To ensure the Department of Defence is informed prior to commencement of works.</p>

No	Condition	Reason
8	<p>Council Housing Strategy</p> <p>The applicant, owner or developer, or any other person with an interest in the land to which the development as approved relates shall, prior to the lodgement of a commencement notice within the meaning of Part II of the Building Control Regulations 1997:</p> <ul style="list-style-type: none"> a) enter into an agreement with the Housing Authority for compliance with the Part V of the Planning and Development Act 2000 (as amended) as referred to in the South Dublin County Council Development Plan 2016-2022, providing, in accordance with that section, for the matters referred to in paragraph (a) or (b) of subsection (3) of section 96, and b) when the agreement with the Housing Authority for compliance with the Part V of the Planning and Development Act 2000 is finalised to the satisfaction of the Housing Authority, a certified copy of the agreement shall be lodged with the Planning Authority. 	<p>To promote social integration consistent with policies/objectives of the Councils Housing Strategy as contained in the South Dublin County Council Development Plan 2016-2022.</p>
9	<p>Owner's Management Company</p> <p>Prior to the commencement of development details of an Owner's Management Company/Companies, or other such legally acceptable management entity, shall be submitted to the Planning Authority for written agreement.</p>	<p>In the interests of proper planning and sustainable development.</p>
10	<p>Landscape Design Proposals</p> <p>Prior to the commencement of development on site, the following landscaping, open space and ecology details shall be submitted to and agreed in writing with the planning authority:</p> <ul style="list-style-type: none"> a) The site shall be landscaped, and earthworks carried out in accordance with the detailed comprehensive scheme of landscaping, including the Landscape Design Statement, which accompanied the application, unless otherwise agreed in writing with the planning authority. b) Details of hard landscaping materials, including materials for the pedestrian and cycle routes and public open space. c) Details in relation to public furniture/benches; d) Proposed locations of trees at appropriate intervals and other landscape planting in the development, including details of the size, species and location of all vegetation, including biodiversity enhancement measures; e) The applicant shall submit cross section details of the tree pits and growing mediums, the applicant shall clearly outline how SuDS features within the tree pits will function. Street trees should be a minimum 18-20cm girth f) Additional play equipment shall be included in the proposed playground, this should be multifunctional for all age groups. 	<p>In the interest of amenity, ecology and sustainable development and to assimilate the development into its surroundings, in accordance with the policies and objectives contained within Section 8.3.0 Public Open Space Hierarchy and Landscape Setting</p>

No	Condition	Reason
	<p>Proposals shall be submitted in the form of a Proposed Play Rationale and Layout Plan (separate to but related to the Landscape Masterplan).</p> <p>g) Levels should be provided on all proposed landscape plans</p> <p>h) Details of soft landscape design; Detailed planting plans (s) and planting schedule (s); species/varieties, quantities, sizes, rootball, presentation, spacings. All planting on site should be pollinator friendly. Further details of this can be found on the Biodiversity Ireland, All Ireland Pollinator Website.</p>	<p>and policies HCL7 Objective 1 and HCL7 Objective 2 of the CDP 2016-2022.</p>
11	<p>Retention of Landscape Architect</p> <p>a) Prior to the commencement of any permitted development, the developer shall appoint and retain the services of a qualified Landscape Architect (or qualified Landscape Designer) as a Landscape Consultant, throughout the life of the construction works and shall notify the planning authority of that appointment in writing prior to commencement.</p> <p>b) A Practical Completion Certificate is to be signed off by the Landscape Architect when all landscape works are fully completed to the satisfaction of the planning authority in accordance with the permitted landscape proposals.</p> <p>c) Installation of attenuation tree pits shall be supervised by the project landscape architect.</p>	<p>In the interests of residential and visual amenity and to ensure full and verifiable implementation of the approved landscape design</p>
12	<p>Children's Play Provision</p> <p>Clarification shall be provided as to the total number and location of play opportunities; the age range they are appropriate for and whether they are universally accessible. An emphasis shall be on active, accessible play throughout the development. The applicant shall provide fully detailed play proposals as part of the landscape scheme for the proposed development. The applicant shall consider the provision of additional universally accessible equipment within the play proposals for the development. Additional details, specifications and images need to be provided in relation to the proposed playgrounds and play spaces for the development. All play equipment shall be of predominantly natural materials with unstructured play included in the proposed design. The applicant shall consider the use of engineered woodchip as playground surfacing material. Proposals shall be submitted in the form of a Proposed Play Rationale and Layout Plan (separate to but related to the Landscape Masterplan).</p>	<p>To uphold the policies of the South Dublin County Council Development Plan 2016-2022 relating to Children's play, and to provide for the proper planning and sustainable development of the area.</p>
13	<p>Pedestrian Access</p> <p>Pedestrian access to the public open space areas shall be permanent, open 24 hours a day, with no gates or security barriers at the entrances to the development. In addition, areas designated as Public Open Space within the</p>	<p>In the interest of social inclusion and to secure the integrity of the</p>

No	Condition	Reason
	<p>development should not contain undercroft areas or be designed in such a manner which would restrict pedestrian access between the public open space areas.</p> <p>Prior to the occupation of any residential unit, the developer shall ensure that the public realm areas and new routes, as outlined in the site layout plan and landscape drawings shall be fully completed and open to the public.</p>	<p>proposed development including open spaces</p>
14	<p>SUDS</p> <p>A comprehensive SUDS Management and Maintenance Plan shall be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation. Additional natural SUDS features shall be incorporated into the proposed drainage system for the development such as, detention basins, filter drains, swales etc. In addition, the applicant shall provide the following:</p> <ul style="list-style-type: none"> • Demonstrate the treatment train, biodiversity value and amenity value of the SUDS proposals for the catchment in the residential areas. • Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development including drainage / attenuation calculations for same. • The applicant shall show further proposed SuDS features for the development such as green roofs, grass areas, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS. Bio retention tree pits should be designed so that they enable tree pits to both support healthy tree growth while at the same time to help treat and attenuate water coming from hard landscaping areas. • Natural Suds measures should be detailed to remove/ reduce the requirement for underground attenuation tanks in line with the development plan objectives. • Tree Pits to incorporate SuDS bioretention features and sufficient growing medium. SuDS details need to show how the water drains from the road/pavement hard surface into the SUDS tree pit, clearly outlining how SuDS features within the tree pits will function. The applicant is requested to refer to the recently published ‘SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022’ for acceptable SUDS tree pit details. 	<p>To prevent the increased risk of flooding and to improve and protect water quality, in accordance with policies under Section 8.4.0 Sustainable Urban Drainage Systems of the CDP 2016-22 in particular G5 Objective 1 and G5 Objective 2.</p>
15	<p>Green Roofs</p>	<p>To ensure that the development makes</p>

No	Condition	Reason
	<p>Prior to the commencement of Development, details regarding the provision of green roofs within the development to be submitted and agreed in writing with the Planning Authority. The green roofs shall be designed so that they contribute to:</p> <ul style="list-style-type: none"> i. SUDS, ii. the creation of appropriate and biodiversity <p>The details to be submitted shall comprise:</p> <ul style="list-style-type: none"> a) identification of the roof areas to be used for the provision of green roofs; b) details of the planting to be used; and c) details of the maintenance including irrigation. <p>The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.</p>	<p>appropriate provision SUDS and for the protection, enhancement, creation and management of biodiversity in accordance with relevant policies in the CDP 2016-2022</p>
16	<p>Rooftop Gardens/Terraces</p> <p>Prior to the commencement of Development; details regarding the provision of roof top gardens/terraces to be submitted and agreed in writing with the Planning Authority. The details shall include:</p> <ul style="list-style-type: none"> a) A revised layout for each of the roof terraces which contributes to privacy for neighbouring occupiers and comfort for users of the roof terraces; b) Hard and soft landscaping details; c) Details of measures to address noise levels and wind microclimate; d) Details of how inclusive access to and within communal rooftop gardens is achieved; e) Details of proposed safety railings 	<p>To ensure that the development achieves safe, comfortable and attractive amenity spaces in accordance with relevant policies in the CDP 2016-2022</p>
17	<p>Car Park Facilities for Charging Electric Vehicles.</p> <p>The proposed development shall make provision for the charging of electric vehicles.</p> <ul style="list-style-type: none"> a) In the case of surface car parking spaces, 100% of spaces must be provided with electrical ducting and termination points to allow for the provision of future charging points. b) 10% of surface car parking spaces must be provided with electric vehicle charging points as part of initial development, and these must be operational at initial occupation. <p>Details of how it is proposed to comply with these requirements including details of the design of, and signage for, the electric charging points (where they are not in areas to be taken in charge) shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.</p>	<p>In the interests of the proper planning and sustainable development of the area, to provide for improved urban air quality, reduced noise pollution and to support the transition to a low carbon future.</p>
18	<p>Construction Traffic Management Plan</p> <p>Prior to commencement of development a Construction Traffic Management Plan shall be agreed with the Planning Authority.</p>	<p>In the interests of traffic safety and residential amenity.</p>

No	Condition	Reason
19	<p>Biodiversity and Public Lighting</p> <p>a) Prior to the commencement of development, the applicant shall agree in writing an integrated public lighting scheme and Landscape Plan with the Planning Authority, in accordance with all relevant guidelines.</p> <p>b) The Public Lighting Scheme shall be signed off by a qualified bat specialist.</p> <p>c) The mitigation measures proposed in the Bat Assessment shall be implemented in full as they pertain to bats and public lighting.</p> <p>d) During construction, all temporary lighting to facilitate construction should be turned off after daytime working periods to ensure that there is no residual lighting during the hours of darkness.</p>	<p>In the interests of protection of bats, public safety and amenity, to prevent light pollution and in the interests of the proper planning and sustainable development of the area.</p>
20	<p>Services to be Underground</p> <p>a) All public services to the proposed development, including electrical, information and communications technology (ICT) telephone and street lighting cables and equipment shall be located underground throughout the entire site.</p> <p>b) There shall also be provision for broadband throughout the site in accordance with the Planning Authority's policy and requirements.</p> <p>c) Existing overground cables traversing the site shall be diverted underground as per the Utility Report.</p>	<p>In the interests of the visual amenities of the area, the proper planning and sustainable development of the area and compliance with the Council's Development Plan.</p>
21	<p>Irish Water</p> <p>The applicant is required to sign connection agreements for water supply and waste water with Irish Water prior to any works commencing and connecting to the network. All development is to be carried out in compliance with Irish Water Standards codes and practices.</p>	<p>To ensure that the development does not endanger public health.</p>
23	<p>Construction Environmental Management Plan</p> <p>Prior to commencement of development, the applicant shall submit and obtain written agreement of the Planning Authority for a site specific Construction Environmental Management Plan. The CEMP shall identify potential impacts and mitigating measures, and a mechanism for ensuring compliance with environmental legislation, and ensure best construction practices including measures to prevent and control the introduction of pollutants and deleterious matter to surface water and measures to minimise the generation of sediment and silt. Precautions must be taken to ensure there is no entry of solids, during the connection of pipe work, or at any stage to the Corbally stream.</p>	<p>To ensure compliance with relevant environmental legislation and standards during construction, and to prevent the entry of pollutants into watercourses.</p>
24	<p>Street Naming and Dwelling Numbering</p> <p>Prior to the commencement of any works on site the applicant, owner or developer shall submit the following for the written agreement of the Planning</p>	<p>In the interest of the proper planning and sustainable</p>

No	Condition	Reason
	<p>Authority:</p> <p>(i) A street naming and unit numbering scheme, for the development as approved that is in accordance with the Planning Authority's policy and requirements for such schemes, along with associated proposed signage for the scheme.</p> <p>The agreed street name, in both Irish and English or Irish only, shall be erected at the beginning of each street in a manner to be clearly legible, and in accordance with Planning Authority's requirements.</p> <p>The development name should:</p> <ol style="list-style-type: none"> 1. Avoid any duplication within the county of existing names, and 2. Reflect the local and historical context of the approved development, and 3. Comply with; <ol style="list-style-type: none"> a. Development Plan policy, and b. The guidelines on naming and numbering of the Department of the Environment, Heritage and Local Government, and c. Have regard to the Guidelines issued by the Place Names Commission (An Coimisiún Logainmneacha) and d. Preferably make exclusive use of the Irish language. <p>Proposals for an apartment name and numbering scheme and associated signage shall be lodged with the Planning Authority prior to the date of any Commencement Notice within the meaning of Part II of the Building Control Regulations 1997 and prior to the commencement of any works on site. The applicant, developer, or owner is advised to consult with Naming and Numbering section of the Planning Authority in advance of lodging the required scheme.</p>	<p>development of the area and compliance with the South Dublin County Council's Development Plan.</p>
25	<p>Construction and Demolition Waste Management Plan</p> <p>(a) Prior to commencement of development a developed Construction Demolition and Waste Management Plan shall be agreed with the roads department. The agreed plan, along with the written agreement of the roads department shall be lodged to the planning file. The written commitment of the developer to implement the agreed plan shall also be lodged to the file.</p> <p>(b) The plan shall detail that construction waste shall not be left in close proximity to neighbouring residential gardens.</p>	<p>In the interests of public safety, compliance with Development Plan Policy and sustainable waste management.</p>
26	<p>Construction Noise and Hours</p> <p>To control, limit and prevent the generation of unacceptable levels of Environmental Noise Pollution from occurring during construction activity, no Equipment or Machinery (to include pneumatic drills, on-site construction</p>	<p>In the interest of public health by the prevention of unacceptable levels</p>

No	Condition	Reason
	<p>vehicles, generators, etc.) that could give rise to unacceptable levels of noise pollution as set out generally for evening and night-time in S.I. No. 140/2006 - Environmental Noise Regulations 2006 shall be operated on the site before 7.00 hours on weekdays and 9.00 hours on Saturdays nor after 19.00 hours on weekdays and 13.00 hours on Saturdays, nor at any time on Sundays, Bank Holidays or Public Holidays.</p> <p>Any construction work outside these hours that could give rise to unacceptable levels of noise pollution shall only be permitted following a written request to the Planning Authority and the subsequent receipt of the written consent of the Planning Authority, having regard to the reasonable justification and circumstances and a commitment to minimise as far as practicable any unacceptable noise outside the hours stated above. In this respect, the applicant or developer shall also comply with BS 5228:2009 Noise and Vibration Control on Construction and Open Sites, and have regard to the World Health Organisation (WHO) – Guidelines for Community Noise (1999).</p> <p>The applicant or developer shall also endeavour to engage in local consultation in respect of any noise sensitive location within 30 metres of the development as approved prior to construction activity commencing on site. Such noise sensitive locations should be provided with the following:</p> <ul style="list-style-type: none"> - Schedule of works to include approximate timeframes - Name and contact details of contractor responsible for managing noise complaints - Hours of operation- including any scheduled times for the use of equipment likely to be the source of significant noise. 	<p>of noise pollution which could interfere with normal sleep and rest patterns and/or when people could reasonably expect a level of quietness, the proper planning and sustainable development of the area and to uphold the Council’s amenity policies set out in the South Dublin County Council Development Plan.</p>
27	<p>Minimise Air Blown Dust</p> <p>During the construction and or demolition phase of the development, Best Practicable Means shall be employed to minimise air blown dust being emitted from the site. This shall include covering skips and slack-heaps, netting of scaffolding, daily washing down of pavements or other public areas, and any other precautions necessary to prevent dust nuisances. The applicant/developer shall comply with British Standard B.S. 5228 Noise Control on Construction and Open sites and British Standard B.S. 6187 Code of Practice for demolition.</p>	<p>In the interest of public health and to uphold the Council’s policies set out in the South Dublin County Council Development Plan.</p>
28	<p>Section 48 Financial Contribution</p> <p>The developer shall pay to the planning authority a financial contribution in a sum to be agreed with the Planning Authority, in respect of public infrastructure and facilities benefiting development within the area of the planning authority, that is provided, or intended to be provided by or on behalf</p>	<p>The provision of such facilities will facilitate the proposed development. It is</p>

No	Condition	Reason
	<p>of the authority, in accordance with the terms of the Development Contribution Scheme 2021 - 2025, made under Section 48 of the Planning and Development Acts 2000-2011 (as amended).</p> <p>The contribution shall be paid prior to commencement of development, or in such phased payments as the planning authority may facilitate. Contributions shall be payable at the rate pertaining to the year in which implementation of the planning permission is commenced as outlined in the South Dublin County Council Development Contribution Scheme 2021 - 2025.</p>	<p>considered reasonable that the payment of a contribution be required, in respect of public infrastructure and facilities benefiting development in the area of the Planning Authority and that is provided, or that is intended will be provided, by or on behalf of the Local Authority.</p>
29	<p>Heat Net</p> <p>Prior to the commencement of development the applicant /developer shall submit to the Planning Authority for written agreement details of proposals to connect in to the Heat Net project in the Tallaght Area to supply a heat and energy source to the proposed development. Such details shall future proof the proposed development in the event that Heat Net is not longer available at some point in the future.</p>	<p>To comply with the Heat Net policy for the Tallaght Area in order to provide a sustainable heat source to the proposed development.</p>

Appendix 2: s.247 Stage 1 Pre-Application Consultation Minutes

SOUTH DUBLIN COUNTY COUNCIL PLANNING DEPARTMENT PRE-APPLICATION CONSULTATION REPORT FORM		
Pre Planning Ref. No. SHD1SPP006/21	ADVICE WITHOUT PREJUDICE	Meeting held under the provisions of the recently adopted Strategic Housing Legislation. Any subsequent planning application should be lodged with ABP under the aforementioned legislation.
CONSULTATION:	Meeting	X
Date of Consultation: 30/4/2021		
Full address of subject site	Broomhill Road and Broomhill Terrace, Dublin 24	
Name/s of Applicant/s and/or Agents Contact Details	Applicant: Austin McHale	
	Agent: Brock McClure Planning and Development Consultants	
SDCC Staff participating	Jim Johnston, Colm Maguire (Planning); Aws Taki (Roads); Laurence Colleran (Public Realm); Ronan Toft (Water Services).	

DESCRIPTION OF PROPOSAL
The scheme consists of the construction of a build-to-sell mixed-use residential development with commercial space (552sqm), childcare facility (182sqm), landscaped open spaces, upgrades to the public realm along Broomhill Road, and a new pedestrian landscaped road edge and plaza to Broomhill road. The proposed development seeks to provide 249 residential units consisting of 51 duplexes, 42 of which are two bed and 9 of which are one bed, and 198 apartments comprising a mix of 87 x2-bed apartments and 111 x1-bed apartments distributed over three apartment blocks.

Relevant Planning History
None on subject lands.

ZONING: 'REGEN' – *'To facilitate enterprise and/or residential led regeneration.'*

LAND USE MATRIX – The proposed uses are permitted in principle under this zoning.

FEEDBACK/OBSERVATIONS OF PROPOSAL

**Comment
where
relevant:**

Applicant's Presentation

- 1km from Luas, 550m from BusConnects artery.
- Relying on PT as our car parking is low.
- We've looked at Dev Plan zoning.
- We've looked at LAP indicative layout.
- Sticking to the heights. South side of the site we are treating as having similar height requirement as the northside.
- We are going for mostly east-west apartments.
- We are keeping car parking on the surface if possible. We want to avoid the cost of the underground car park. This informs the number of apartments that we have proposed.
- Scheme brings people in through south-west corner.
- We haven't maxed out the site.
- Mixed use frontage to west of the site.
- 2 beds and 1 beds at the moment. We haven't put any 3 beds in at the moment.
- 162 dph.
- 249 units.
- CP: 104 spaces / 0.4 per unit.
- Dual Aspect: 44% at the moment. We will improve that.

Planning

- Dual Aspect will need looking at.
- Is tenure build-to-sell?
 - o Applicant: Expectation is to allow build-to-sell apartments, and this is a BTS application. In reality it will likely be a PRS scheme.
- Building Heights appear to exceed LAP height strategy.
- You breach the building line on Broomhill Road. We might welcome that in context of regeneration.
- 3-beds required as per LAP.
- 10% public open space required. How are you controlling access to the communal open space? If it is controlled, its not public. If there is no POS, the LAP provides for a financial contribution to be provided in lieu of the POS.
 - o That's probably the route we will go.
- Plot Ratio is 1.36. That exceeds the LAP requirements (0.75 – 1.0).
- HeatNet proposal: use heat from the district heating plant nearby. But I advise future-proofing this.
- Active Street Frontage and blocks shouldn't more than 100 metres in length.

- Note and include information on our progress to the 3,500 units.
- Land-use mix in Local Area Plan: Business and Employment uses. The land-use mix / urban function is business/employment, and residential development along Airton Road. We need to hold onto areas of employment. LAP looks for higher value commercial uses.
 - o App: We need to put in a convincing argument and response to that issue.
- What is the use to the west at GF? We'd obviously prefer office.
- Careful consideration of streetscapes at site boundaries required.
- Building Height and Plot Ratio: Note the policies for flexibility in the Local Area Plan. Major public amenities are what we are looking for to justify additional bulk.
- Sequencing and Implementation Policy and Design Criteria.

Roads

- Maximum car parking ratio of 0.75 in this area.
- In addition, we are looking for 10% of overall provision to be equipped with electric charging vehicles. 10% for mobility spaces.
- Reversing distance of 6m for perpendicular parking spaces.
- 380 bicycle parking spaces is acceptable – though apartment guidelines would seek 502.
- We would look for a Road Safety Audit.
- We would look for a 2m wide footpath.
- We would look for autotracks / details showing how fire tenders and bin lorries would access the site, and what bin operation would be.
- TTA required.
- MMP required.
- Public Lighting Plan needs to be agreed with Public Lighting Department.
- Taking in Charge Plan
- Applicant: Along Broomhill Road itself, we have a very wide grass verge. I think these projects sometimes benefit from some set-down parking on the road. What would your attitude be?

Roads: Depends on LAP standards.

Drainage

- Provide a drawing showing existing and proposed services, and adequate setbacks from existing services.
- All should be in line with Irish Water standards and Greater Dublin Drainage Scheme standards.
- We'd promote natural SUDs features on a site like this which is currently very hard. Use the surface car parking.

-
- Applicant: We'd like to incorporate as much SUDs as possible, but this is a tight enough development.
 - We will use attenuation, Qbar run-off rate and permeable paving. If parking is to be taking-in-charge, we won't be able to use permeable paving there.
 - Just include as much natural as possible. But if attenuation is required, we prefer arch-type systems, for maintenance reasons.
 - If an area is to be taken in charge, we would need to see section of tank under the road.
 - Make a pre-connection enquiry with Irish Water.
 - Submit a Site-Specific Flood Risk Assessment.

Conclusion

- Employment is needed in the area. People here will have to work, and that is a key component for building a sustainable community.
 - You would need to nail your argument to convince us and the Board that employment uses are being catered for.
 - Applicant: We'll be sure to do an analysis and include it as part of the application documents.
 - Parks concerns would be SUDs features, tree pits, access arrangements, and details of children's play area.
-

Colm Maguire
Assistant Planner

Appendix 3: Roads Report

Register Reference: SHD3ABP-313591-22

Date: 17/05/2022.

Development: the construction of a new residential and mixed use scheme of 242 apartment units in 5 blocks (Blocks A to E) ranging from 4 to 7 storeys in height as follows: Block A (5 storeys) comprising 40 apartments (4 one bed, 31 two bed and 5 three bed units); Block B and C (7 storeys) comprising 102 apartments (45 one bed and 57 two bed units); Block D (5 - 7 storeys) comprising 36 apartments (16 one bed and 20 two bed units); Block E (4 - 5 storeys) comprising 64 apartments (31 one bed and 33 two bed units); Block D will accommodate a Childcare Facility/creche of approx. 465sqm at ground floor level; The proposal will also provide for a café of approx. 50.9 sqm at the ground floor of Block C. Residential amenity areas will be provided in the form of a reception of approx. 125.1sqm, resident lounge of approx. 45sqm, a letting office of approx. 11.8sqm, a rentable room/studio space of 39sqm, a public gym of approx; 128.5sqm and a public co-working space of approx. 128.4sqm, all at the ground floor level of Blocks B & C; Each residential unit will be afforded with private open space in the form of a balcony or terrace. Communal open space of 1,797.4sqm is proposed in the form of 2 roof top terraces at Blocks D and E, courtyard space at ground level, outdoor seating and planting and pedestrian and cyclist links; Public open space of 1,400sqm is also proposed in the courtyard area, fully accessible to the general public and includes outdoor seating, paved areas, a lawn area, and play areas in addition to an outdoor seating area to the front of the proposed café at Block C; A total of 136 car parking spaces are provided at ground floor level, including 7 Accessible spaces at surface level; and 426 bicycle spaces (Visitor and Resident in bike stands and secure stacked bike spaces) are proposed; The development shall be served via a new vehicular access point from Broomhill Road; Upgrade works are proposed to the vehicular access point to facilitate the proposed development and to provide for improved access and egress for the overall development. New pedestrian and cyclist access points will be provided on to Broomhill Road from the site; The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; boundary treatment; internal roads and footpaths; waste storage areas and electrical services and all associated site development works; The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant development plan; The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.

Location: Lands at Broomhill Road & Unit 51 Broomhill Road, Tallaght, Dublin 24

Applicant: Garyaron Homes
App. Type: SHD3-Application to ABP

Planning Officer: Colm Maguire
Date Recd: 4th July 2022.

Prior to commencement of any works in the public domain, and in order to comply with The Roads Act 1993 Section 13 Paragraph 10, a Road Opening Licence must be secured from South Dublin County Council, Roads Maintenance Department.

The applicant has submitted responses to the observations made by SDCC roads department.

Observation

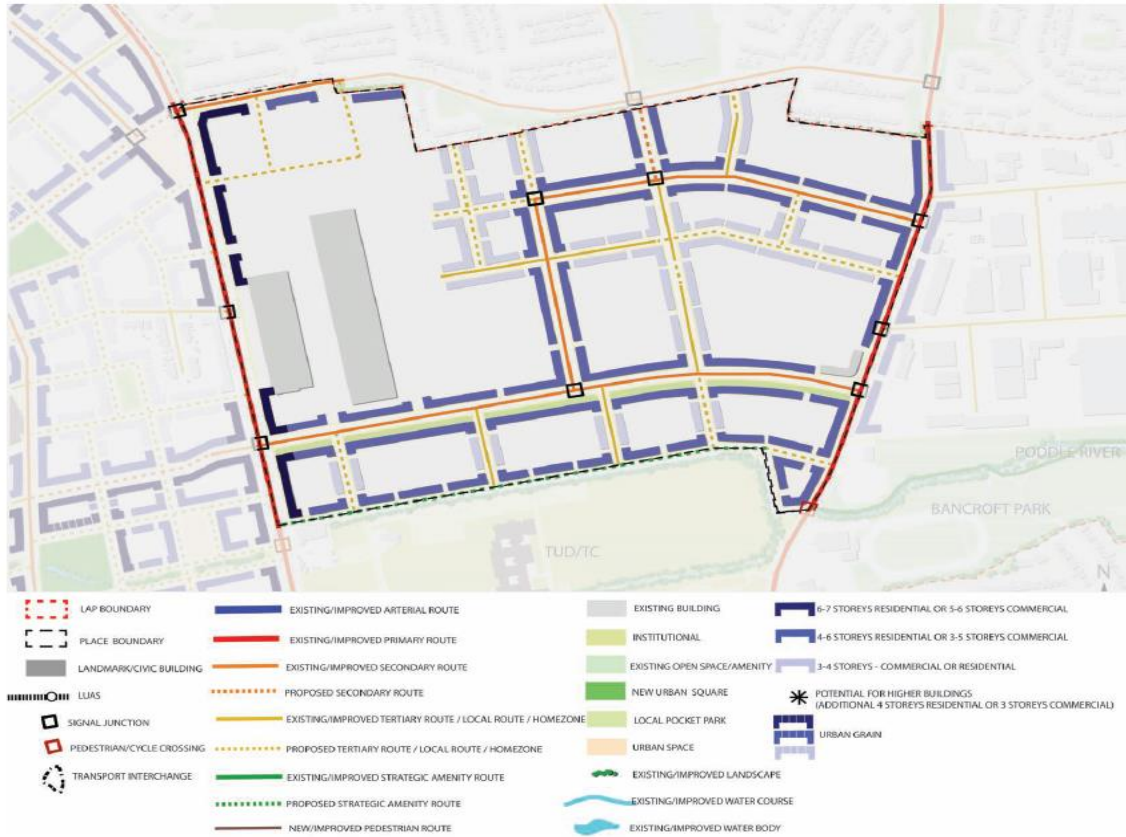
A masterplan is required to ensure a coordinated approach to the proposed development. It is important to understand how the design will fit in relation to future neighbouring developments. It is important to maximise the pedestrian, cyclist, and vehicular permeability throughout the site and to the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

Response

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

SDCC Response.

The applicant has not submitted details of the overall masterplan and how their development complements it. The LAP identifies road types and infrastructure around this development, the applicant should merge their development into the surrounding proposed local area plan. The applicant has submitted details of the permeability within their development, but a wider scope detailing improvements surround the development would be required.



Observation

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

Response

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

SDCC Roads Response

The figure of 0.65 is the ratio of car parking spaces to dwellings. The maximum allowable under the development plan is 219No. spaces, the applicant is proposing 142No. spaces. A rationale for the reduced parking rate has been supplied, primarily the development will be marketed as a “reduced car dependency” with restricted dedicated car parking for residents.

Observation

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

Response

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

SDCC Roads Response

The applicant has shown a 6.0m wide vehicle access road, but the dimensions of the footpaths are not shown, the footpaths shall be 1.8m wide throughout the development.

Observation

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

Response

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

SDCC Roads Response

The applicant has shown an autotrack of a refuse/fire vehicle entering and exiting the development. The autotrack for the large car entering a parking space details the vehicle passing through a building. The turning area shown in the autotrack for fire tender and refuse trucks will also be used by vehicles when all parking spaces are occupied. The drivers will use this area for turning, this area is shown as pedestrian on the drawings, it maybe safer to provide a dedicated turning point at this location.

Observation

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

Response

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

SDCC Roads Response

The applicant will provide spaces recommended in DMURS

“The standard width of a space should be 2.4m”, and “The standard depth of a perpendicular spaces should be 4.8m”

Observation

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

Response

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

SDCC Roads Response

The applicant will provide 14No. EV parking spaces at the outset and provide ducting to the remainder of spaces for future EV provision.

Observation

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

Response

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

SDCC Roads Response

The applicant is providing 5% of spaces.

Observation

The proposed development shall make provision for the charging of electric vehicles. 100% of surface car parking spaces must be provided with electrical ducting and termination points to allow for the provision of future charging points, and 10% of surface car parking spaces must be provided with electric vehicle charging points initially. Details of how it is proposed to comply with these requirements including details of the design of, and signage for, the electric charging points (where they are not in areas to be taken in charge) shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. REASON: In the interest of sustainable transport.

Response

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

SDCC Roads Response

The applicant has agreed to provide the future charging points.

Observation

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

Response

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

SDCC Roads Response

The applicant will not cover the short-term visitor parking spaces outside.

Observation

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

Response

This has been provided by NRB and accompanies this application.

SDCC Roads Response

The road safety audit has identified four issues with the development. The recommended measures for all have been accepted by the applicant but the overall site layout plan does not show the changes. The applicant should submit updated drawings to take account of the road safety recommendations.

Observation

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

Response

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

SDCC Roads Response

The applicant has submitted a pedestrian route plan.

Observation

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

Response

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

SDCC Roads Response

This is acceptable to the planning authority.

Observation

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

Response

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

SDCC Roads Response

The applicant has provided a Servicing and operational waste management plan, this sets out the strategy for deliveries and large vehicle access for the development. The refuse collection will be entirely within the development and no on-street collection will be permitted. There is an area identified in the north of the development west of Block A that is designated as Bin Collection Block B&C, this area should not be used for refuse collection from Broomhill Terrace.

Observation

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

Response

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

SDCC Roads Response

The cycle links are not clear. A cross section and plan detailing dedicated cycling provision on Broomhill Road linking to Airton Road should be provided. A cross section and plan detailing the cycling provision along Broomhill Terrace along the applicant's northern boundary should be provided.

Observation

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

Response

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

SDCC Roads Response

Response is noted.

Observation

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

Response

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

SDCC Roads Response

It is not clear from the applicant's drawings if the footpath along Broomhill Road and Broomhill Terrace will be public or private. If the applicant is upgrading or installing infrastructure into the public realm then this should be identified, and if necessary, details of the construction to taking in charge standards.

Observation

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

Response

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

SDCC Roads Response

The detailed Construction and Demolition Management plan can be submitted post planning.

Observation

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

Response

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

SDCC Roads Response

Noted.

Observation

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

Response

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

SDCC Roads Response

The applicant has stated that there is ample road width to provide a cycle path in the future, but have no logical reason to provide such a cycle lane at the moment. The applicant has depended heavily on a reduced car dependent development and suggested alternative modes of transport, one such mode is cycling, it is therefore prudent to provide a dedicated cycle link to the wider cycle network. The closest link will be the proposed Cycle South Dublin network on Airton Road, it is reasonable to request the applicant to provide a link to this infrastructure.

Observation

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

Response

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

SDCC Roads Response

A parking management strategy has been submitted. The plan details the parking arrangements at the development. Most of the parking arrangements will be overseen by a management company, with some apartments receiving dedicated parking spaces at the time of sale or rent. The remainder of the spaces will be unallocated, and some will be available for visitors. There is some scope for a car sharing scheme, but no details are provided. The crèche and other commercial areas have no dedicated parking/set down spaces identified.

Observation

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

Response

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

SDCC Roads Response

The applicant has submitted a DMURS design statement. Detailing the visibility splay at the vehicle access. The proposed vehicle access will be a priority-controlled junction, the applicant is requested to submit details of this layout and any proposals to alter the road markings at this location. The statement details the internal roads layout and pedestrian walkways etc.

Roads department have the following observations:

1. A masterplan is required to ensure a coordinated approach to the proposed development. It is important to understand how the design will fit in relation to future neighbouring developments. It is important to maximise the pedestrian, cyclist, and vehicular permeability throughout the site and to the wider masterplan area. A design of the road, footpath and cycle lane for the development in line with the LAP for Tallaght is required.
2. The car parking size should be 5.0m x 2.5m with 6m reversing distance to help access and egress from the parking spaces. Prior to construction a revised layout showing parking spaces of 2.5m x 5.0m must be agreed in writing with the roads department and a copy filed with the planning department.
3. Bicycle parking provision is to be to 2018 Apartment Guidelines which is satisfactory. However, all spaces including visitor spaces are recommended to be covered spaces to encourage this mode of travel.
4. The applicant shall comply with the recommendations of the stage 1 Road safety audit for the proposed development. And submit layout plans showing the changes.
5. A Mobility Management Plan is to be completed within six months of opening of the proposed development. The Mobility Management Plan shall be agreed in writing with the roads department and the agreed plan, along with the written agreement of the roads department shall be lodged to the planning file. The written commitment of the developer to implement the agreed plan shall also be lodged to the file. REASON: In the interest of sustainable transport.
6. The management of bin storage needs to be set out clearly. The noted waste collection area at the north of the development west of Block A needs to be clarified.

7. The cycle access between Broomhill Terrace and Airton Road should be improved. As to provide a segregated cycle lane to link with the Cycle South Dublin proposals on Airton Road.
8. Prior to commencement, SDCC will require a public lighting scheme to be agreed with South Dublin County Council Lighting Department.
9. All items and areas for taking in charge shall be undertaken to a taking in charge standard. Prior to development the applicant shall submit construction details of all items to be taken in charge. No development shall take place until these items have been agreed.
10. Prior to commencement a developed Construction Demolition and Waste Management Plan shall be agreed by SDCC and lodged on the planning file.
11. The footpath at the existing entrance is to be continued and made good when the access point is closed. The footpath and grass verge shall match the existing and in line with SDCC taking in charge standards.
12. The proposal shall include the upgrade of local cycle facilities along the frontage of the site.

Appendix 4: Public Realm Report

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Public Realm Planning Report

Development: the construction of a new residential and mixed use scheme of 242 apartment units in 5 blocks (Blocks A to E) ranging from 4 to 7 storeys in height as follows: Block A (5 storeys) comprising 40 apartments (4 one bed, 31 two bed and 5 three bed units); Block B and C (7 storeys) comprising 102 apartments (45 one bed and 57 two bed units); Block D (5 - 7 storeys) comprising 36 apartments (16 one bed and 20 two bed units); Block E (4 - 5 storeys) comprising 64 apartments (31 one bed and 33 two bed units); Block D will accommodate a Childcare Facility/creche of approx. 465sqm at ground floor level; The proposal will also provide for a café of approx. 50.9 sqm at the ground floor of Block C. Residential amenity areas will be provided in the form of a reception of approx. 125.1sqm, resident lounge of approx. 45sqm, a letting office of approx. 11.8sqm, a rentable room/studio space of 39sqm, a public gym of approx; 128.5sqm and a public co-working space of approx. 128.4sqm, all at the ground floor level of Blocks B & C; Each residential unit will be afforded with private open space in the form of a balcony or terrace. Communal open space of 1,797.4sqm is proposed in the form of 2 roof top terraces at Blocks D and E, courtyard space at ground level, outdoor seating and planting and pedestrian and cyclist links; Public open space of 1,400sqm is also proposed in the courtyard area, fully accessible to the general public and includes outdoor seating, paved areas, a lawn area, and play areas in addition to an outdoor seating area to the front of the proposed café at Block C; A total of 136 car parking spaces are provided at ground floor level, including 7 Accessible spaces at surface level; and 426 bicycle spaces (Visitor and Resident in bike stands and secure stacked bike spaces) are proposed; The development shall be served via a new vehicular access point from Broomhill Road; Upgrade works are proposed to the vehicular access point to facilitate the proposed development and to provide for improved access and egress for the overall development. New pedestrian and cyclist access points will be provided on to Broomhill Road from the site; The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; boundary treatment; internal roads and footpaths; waste storage areas and electrical services and all associated site development works; The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant development plan; The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding

that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.

Location: Lands at Broomhill Road & Unit 51 Broomhill Road, Tallaght, Dublin 24

Applicant: Garyaron Homes

Reg. Ref: SHD3ABP-313591-22

Report Date: 22/06/202

Planning Officer: Aoife O'Connor Massingham

Main Concerns:

- Greater level of detailed required regarding proposed play provision to be provided within the development.
- Greater level of detailed required regarding the tree pits and SUDS features to be provided within the development.
- Greater level of detailed required in terms of soft and hard landscaping to be provided within the development.
- Detailed taking in charge drawing to be provided

**Statutory Local Policy of Relevance
Tallaght Town Centre Local Area Plan, 2020 – 2026**

Chapter 2 Urban Framework

- Section 2.6 Intensity of Development
- Section 2.6.1 Plot Ratio
- Section 2.6.2 Height and Built Form
- Section 2.7 Public Realm and Open Space

Chapter 3 Neighbourhoods

- Section 3.5 Broomhill Neighbourhood

Chapter 5 Residential and Community

- Section 5.2 Residential Development
- Section 5.2.1 Housing Mix
- Section 5.2.3 Dwelling Size, Internal Layout and Amenity Space
- Section 5.3 Community Facilities

- Section 5.3.2 Childcare Facilities
- Section 5.3.3 Children’s Playgrounds

Chapter 7 Climate Change Mitigation and Adaptation

- Section 7.2.1 Green Infrastructure – Surface Water Management
- Section 7.2.6 Green Infrastructure Strategy

Relevant Sections, Policies and Objectives of the SDCC Development Plan 2016-2022:

DP 2016-22 Section 8.3.0 Public Open Space Hierarchy and Landscape Setting

It is the policy of the Council to provide a hierarchy of high quality and multi-functional public parks and open spaces.

G4 Objective 1: To support and facilitate the provision of a network of high quality, well located and multifunctional public parks and open spaces throughout the County and to protect and enhance the environmental capacity and ecological function of these spaces.

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.

DP 2016-22 Section 8.1.0 Green Infrastructure Network

G2 Objective 1: To reduce fragmentation of the Green Infrastructure network and strengthen ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network

G2 Objective 2: To protect and enhance the biodiversity value and ecological function of the Green Infrastructure network.

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

G2 Objective 9: To preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within the design proposals and supporting their integration into the Green Infrastructure Network.

G2 Objective 10: To promote a network of paths and cycle tracks to enhance accessibility to the Green Infrastructure network, while ensuring that the design and operation of the routes responds to the ecological needs of each site.

G2 objective 11: To incorporate appropriate elements of Green Infrastructure e.g. new tree planting etc. into existing areas of hard infrastructure wherever possible.

G2 Objective 13: To seek to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species

DP 2016-22 Section 8.5.0 Green Infrastructure within Urban Areas

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

DP 2016-22 Section 9 Heritage Conservation and Landscapes

HCL15 Objective 1: To ensure that development does not have a significant adverse impact on rare and threatened species, including those protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992.

HCL15 Objective 3: To protect existing trees, hedgerows, and woodlands which are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management in accordance with Living with Trees: South Dublin County Council's Tree Management Policy 2015-2020.

DP 2016-22 Section 8.4.0 Sustainable Urban Drainage Systems

Sustainable Urban Drainage Systems (SUDS) drain surface water in an environmentally friendly way by replicating natural systems in managed environments. SUDS systems seek to collect, store and clean surface water using natural systems and to release it back into the environment in a slow and controlled way, thereby reducing the risk of fluvial and pluvial flooding. Key features, such as integrated constructed wetlands, permeable surfaces, filter strips, ponds, swales and basins are easy to manage, environmentally friendly and aesthetically attractive.

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

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

DP 2016-22 Section 2.3.0 Quality of Residential Development

2.3.2 PUBLIC OPEN SPACE

The provision of public open space that is appropriately designed, properly located and well maintained is a key element of high quality residential environments. Public open space should have active and passive recreational value and should enhance the identity and amenity of an area.

H12 Objective 1: H12 Objective 2:

Policy and objectives seek that new residential development is served by a clear hierarchy and network of high quality public open spaces that provides for active and passive recreation.

Zoning:

The site is zoned Objective 'REGEN – To facilitate enterprise and/or residential led regeneration' which lists Residential use as Permitted in Principle.

Density:

242 units / ha

Total Site Area:

Approx. 1.4 ha or 3.6 acres

Public Open Space

1,400m² (approx. 10% of the site)

Communal Open Space

1,797.4m² (12.8%)

Public Open Space Requirements

The Planning Authority will require public open space to be provided as an integral part of the design of new residential and mixed-use developments. In areas that are designated Zoning Objective RES-N all new residential development shall be required to incorporate a minimum of 14% of the total site area as public open space; 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.

Tallaght Town Centre Local Area Plan 2020-2026

The site is located within Tallaght Town Centre Development area. Within the Development area, the application lands are located within the Broomhill neighbourhood area.

As per Section 3.5 Broomhill; the Key Objectives for for Broomhill (BH): Neighbourhood include:

- BH1: Transition to mixed use area primarily focused on higher value commercial uses.
- BH2: Improve legibility throughout area with new local routes and new connections to Kilnamanagh and Tallaght University Hub. Improve interface with all existing and proposed routes and open spaces.
- BH3: New corridors for green infrastructure connecting adjoining communities. Improved green infrastructure buffer to Kilnamanagh.

- BH4: Maintain buffer along stream on southern edge of Broomhill neighbourhood.
- BH5: Maintain existing building line set back along Airton Road and seek delivery of a linear park along southern side of Airton Road in tandem with development

As per Section **2.7 Public Realm and Open Space** of the LAP; Development proposals will be required to ensure successful interaction between the residential scheme, streets and public realm to foster a true sense of neighbourhood and encourage interaction between residents. Opportunities for animated ground floors, homes with own door access, private landscaped terraces and a successful integration with communal and public open space shall be encouraged. Along mixed frontage streets commercial, communal and other appropriate active uses at ground floor level shall be required.

Section 2.7.2 Public Open Space

A minimum of 10% of the gross site area shall be dedicated for use as public open space within any proposal for development which shall be of a high quality and integrated into an overall interconnected network of public open space and green routes. In general, the public open space requirements should be met on site by the developer in any development proposal. In the event that the site is considered by the planning authority to be too small or inappropriate (because of site shape or general layout) to fulfil useful purpose in this regard, then a financial contribution towards provision of public open space in the area, South Dublin County Council improvements to an existing park and/or enhancement of amenities shall be required.

Section 2.7.3 Open Space and Green Infrastructure

The LAP will seek to implement the policies and objectives for Green Infrastructure as outlined in the County Development Plan. Some of the key principles for open space and green and blue infrastructure for the Plan are as follows:

- 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 reduce fragmentation and strengthen ecological links, including the uplifting of the River Poodle (Objective OS4).

- 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 (Objective OS5).
- To support native plant and animal species and encourage corridors for their movement (Objective OS6).
- To incorporate existing features such as Cookstown Reservoir into the Green Infrastructure elements of the Plan (Objective OS7).

Public Realm Comments:

In relation to the above proposed development, this section has reviewed the application and has the following comments:

1) Public Open Space Provision

Public open space within the development is being provided in the form of a central courtyard which will be accessible to the public and will be directly accessible from Broomhill Road to the west of the site via an existing access point. The Public open space will include lawn areas, seating and play areas. The open space will be connected via pedestrian and cyclist linkages throughout the site and a key west-east and north-south linkage is proposed. The LAP requires that a minimum of 10% of the gross site area shall be dedicated for use as public open space within any proposal for development which shall be of a high quality and integrated into an overall interconnected network of public open space and green routes. Within the subject site the open space provision only meets the minimum 10% required. The public realm section welcomes that fact that central open space/courtyard will be open to the public, will include lawn areas, seating and play areas and as such is considered meaningful public open space. The public realm section would however have some concerns regarding the functionality and usability of the public open space provided. There are some concerns regarding the potential effect on amenity due to overshadowing and wind tunnelling effect created by the tall buildings (4 to 7 storeys).

2) Communal open space

Communal open space is provided within the central courtyard and includes areas of hard landscape, tree planting, lawns, ornamental planting including seating / passive amenity areas, and active community areas. The applicant/developer has not specifically specified or mentioned the percentage of communal open space being provide for with the development. The Landscape Design Statement states that: "The

communal open space includes green infrastructure (including bio-retention areas), roof terraces, pocket parks, urban furniture, shared spaces and designated play spaces. The site layout will ensure properties face areas of open space (and streets) to provide passive supervision / ownership ensuring no hidden corners”

Communal open space within residential developments is a critical environmental resource as a ‘breathing space’ and for meeting the amenity needs of residents. Communal open space should include green spaces that support communal free play, sports and biodiversity. Development proposals shall demonstrate that the communal open space:

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

3) Open Space Design

The quality of the spaces between buildings is as important as the buildings themselves. Public spaces are streets, squares, and other spaces that are open to all. They are the setting for most movement. The design of a public space encompasses its siting and integration into the wider network of routes as well as its various elements. These include areas allocated to different users – cars, cyclists and pedestrians – for different purposes such as movement or parking, hard and soft surfaces, street furniture, lighting, signage and public art.

Open space design within developments shall:

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

In addition:

- The Public and communal open spaces for the proposed development should be designed to all relevant qualitative standards, in addition public and communal open spaces should be designed to be usable and functional within the overall proposed development.
- Any proposed pedestrian connections to adjoining lands should be clearly indicated on plans. The applicant should show how public open spaces in the wider area will link in and integrate with the proposed development. The public realm should be integrated into the adjacent development areas, creating continuous green infrastructure connections that form both physical and bio-diversity links.
- The proposed development should create positive additions to the open spaces of the area in the form of planting, permeability, and usable open space.
- Photomontages and cross sections at appropriate intervals for the proposed development including how the development will interface with existing housing and contiguous lands.
- A microclimate assessment for all open spaces should be provided.
- All access points are required to have active frontage throughout and passive surveillance to provide welcoming functioning access routes.
- A Universal Accessibility Map should be submitted to demonstrate that the development is inclusive to people of all abilities. This should be accompanied with a movement strategy plan for cyclists and pedestrians.

The urban network of public spaces should be clearly delineated. Further consideration and/or justification should be given to the design and treatment of the public open spaces to ensure that they are appropriate to the future residential community and have sufficient animation. In addition, the proposed public open spaces within the proposed development should represent a significant planning gain.

4) Green Roofs

The Public Realm Section welcomes the proposals that some of the rooftops will be extensive green roofs. However, if possible, the applicant is requested to provide intensive green roofs which can be accessible to residents and provide additional communal open space. Intensive Green Roofs or Roof gardens provide similar benefits as a small urban park. They have a deep layer of soil, which can support a range of plants, trees and shrubs. Native species (plants which would grow naturally in the local area) can provide a rich habitat for wildlife. Intensive Green Roofs should be designed to include access for people. In addition,

Intensively designed Green Roofs provide increased opportunities for biodiversity compared to extensive green roofs.

5) Play Provision

The landscape plans propose two main areas of 'play'. The main play area is located within the central courtyard public open space. The second play area is adjacent to the Crèche on the corner of Block D. This outdoor play area will be a private, designated for those utilising the Crèche services. It is suggested that the area will be imaginatively landscaped to encourage play, although no play equipment has to be provided. Natural play options and subtle mounding will provide engaging play areas for toddlers as well as older children. The Public Realm Section welcomes the provision of a play area with the central courtyard public open space however provision should also be made for older children and teenagers with the proposed public open space areas. Additional details, specifications and images need to be provided in relation to the proposed play area within the public open space areas of the development. All play equipment should be of predominantly natural materials with unstructured play included in the proposed design. The playground designer/landscape architect can contact SDCC public realm section to discuss the proposed playground, including the inclusion of additional universally accessible equipment. The applicant should consider the use of engineered woodchip as playground surfacing material. The applicant shall provide further detail with regard to the play space design and play items to be included to be provided with the public open space areas.

6) Biodiversity

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

1.1 Green roofs

Sedum roofs have little biodiversity benefits, instead we would encourage more biodiversity on roofs such as brown roofs, wildflower roofs and extensive green roofs.

2.1 Hedges

Provide flowers and fruits for wildlife, nesting opportunities for birds and cover for hedgehogs.

3.1 Pollinators

A variety of wildflowers and shrubs are proposed in the planting that providing shelter as well as nectar and pollen to feed butterflies and bees. The plant selection is based on recommendations within the All Ireland Pollinator Plan (2015-2020).

Further information is required in this regard. The applicant shall provide further detail with regard to the proposed biodiversity strategies proposed including their implementation and future management and maintenance. Consideration should be given to the development of a Biodiversity Management Plan for the proposed development site.

7) Arboricultural Impact

As per the submitted Arboricultural Impact Assessment prepared by Arbor Care Ltd; The arboricultural impact of the proposed development on the site will be moderate. It is proposed to remove out of 11 trees and 1 tree hedgerow out of a total of 20 trees surveyed to facilitate the scheme. Of the trees to be removed to accommodate the proposed design, these consist of 0 no. category A trees, 6 no. category B and 6 no. category C trees and 0 no. category U trees. Specific Mitigation/Compensation Measures should be proposed by the applicant to compensate for those trees being removed in order to accommodate the proposed development.

8) Proposed Tree Works and Tree Protection Fencing

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

Where retained trees are at risk of damage, the default position as set out by BS 5837:2012 is that retained trees must be protected from construction operations with the erection of robust protective fencing positioned on the outer edge of the RPA or crown spread (whichever is greatest). All site operations will be restricted to the area outside of tree protection fencing and this area will form a Construction Exclusion

Zone (CEZ) unless agreed otherwise. Protection measures will be installed as set out in the Tree Protection Plan. Fencing shall be constructed with robust vertical and horizontal scaffold framework with weldmesh panels firmly attached in accordance with BS 5837:2012 Figure 2. Vertical support poles and bracing poles must be located with care to avoid underground utility services and will be sited to avoid the structural roots of retained trees. Where driven supports are not feasible due to the presence of roots or underground utilities block trays, counterweights or equivalent can be utilised. Suitable all-weather signage will be fixed to fencing to notify site staff and visitors of the construction exclusion zone and its purpose. Protective fencing and ground protection shall stay in place until all construction operations are completed.

9) SuDS and Green Infrastructure

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

- Extensive green roofs
- Permeable surfacing
- Tree pits
- Bioretention Areas

10) SuDS Management

The applicant is requested to submit a comprehensive SUDS Management Plan to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan should also be included as a demonstration of how the system will function following implementation.

11) Planting Proposals

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

The Public Realm Section has assessed the proposed development in accordance with the policies and objectives of the County Development Plan 2016-2022 and with best practice guidelines and recommends the following:

(A) Landscape Design Proposals

Prior to the commencement of development on site, the following landscaping, open space and ecology details shall be submitted to and agreed in writing with the planning authority:

- (A) The site shall be landscaped, and earthworks carried out in accordance with the detailed comprehensive scheme of landscaping, including the Landscape Design Statement, which accompanied the application, unless otherwise agreed in writing with the planning authority.
- (B) Details of hard landscaping materials, including materials for the pedestrian and cycle routes and public open space.
- (C) Details in relation to public furniture/benches;
- (D) Proposed locations of trees at appropriate intervals and other landscape planting in the development, including details of the size, species and location of all vegetation, including biodiversity enhancement measures;
- (E) The applicant shall submit cross section details of the tree pits and growing mediums, the applicant shall clearly outline how SuDS features within the tree pits will function. Street trees should be a minimum 18-20cm girth

(F) Additional play equipment shall be included in the proposed playground, this should be multifunctional for all age groups. Proposals shall be submitted in the form of a Proposed Play Rationale and Layout Plan (separate to but related to the Landscape Masterplan).

(G) Levels should be provided on all proposed landscape plans

(H) Details of soft landscape design; Detailed planting plans (s) and planting schedule (s); species/varieties, quantities, sizes, rootball, presentation, spacings. All planting on site should be pollinator friendly. Further details of this can be found on the Biodiversity Ireland, All Ireland Pollinator Website.

REASON: In the interest of amenity, ecology and sustainable development and to assimilate the development into its surroundings, in accordance with the policies and objectives contained within Section 8.3.0 Public Open Space Hierarchy and Landscape Setting and policies HCL7 Objective 1 and HCL7 Objective 2 of the CDP 2016-2022.

2. Retention of Landscape Architect

i) Prior to the commencement of any permitted development, the developer shall appoint and retain the services of a qualified Landscape Architect (or qualified Landscape Designer) as a Landscape Consultant, throughout the life of the construction works and shall notify the planning authority of that appointment in writing prior to commencement.

ii) A Practical Completion Certificate is to be signed off by the Landscape Architect when all landscape works are fully completed to the satisfaction of the planning authority in accordance with the permitted landscape proposals.

iii) Installation of attenuation tree pits shall be supervised by the project landscape architect.

REASON: In the interests of residential and visual amenity and to ensure full and verifiable implementation of the approved landscape design

3. Landscape Management and Maintenance

The submitted Landscape Management and Maintenance Plan shall be implemented in full by the applicant. The landscape management plan shall be carried out as approved.

REASON: To provide for the satisfactory future maintenance of this development in the interest of visual amenity.

4. Pedestrian Access

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

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

REASON: In the interest of social inclusion and to secure the integrity of the proposed development including open spaces

2. Play Provision

Clarification shall be provided as to the total number and location of play opportunities; the age range they are appropriate for and whether they are universally accessible. An emphasis shall be on active, accessible play throughout the development. The applicant shall provide fully detailed play proposals as part of the landscape scheme for the proposed development. The applicant shall consider the provision of additional universally accessible equipment within the play proposals for the development. Additional details, specifications and images need to be provided in relation to the proposed playgrounds and play spaces for the development. All play equipment shall be of predominantly natural materials with unstructured play included in the proposed design. The applicant shall consider the use of engineered woodchip as playground surfacing material. Proposals shall be submitted in the form of a Proposed Play Rationale and Layout Plan (separate to but related to the Landscape Masterplan).

REASON: To uphold the policies of the South Dublin County Council Development Plan 2016-2022 relating to Children's play, and to provide for the proper planning and sustainable development of the area.

3. SUDS

A comprehensive SUDS Management and Maintenance Plan shall be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation. Additional natural SUDS features shall be incorporated into the proposed drainage system for the development such as, detention basins, filter drains, swales etc. In addition, the applicant shall provide the following:

- Demonstrate the treatment train, biodiversity value and amenity value of the SUDS proposals for the catchment in the residential areas.
- Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development including drainage / attenuation calculations for same.
- The applicant shall show further proposed SuDS features for the development such as green roofs, grass areas, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS. Bio retention tree pits should be designed so that they enable tree pits to both support healthy tree growth while at the same time to help treat and attenuate water coming from hard landscaping areas.
- Natural Suds measures should be detailed to remove/ reduce the requirement for underground attenuation tanks in line with the development plan objectives.
- Tree Pits to incorporate SuDS bioretention features and sufficient growing medium. SuDS details need to show how the water drains from the road/pavement hard surface into the SUDS tree pit, clearly outlining how SuDS features within the tree pits will function. The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022' for acceptable SUDS tree pit details.

REASON: To prevent the increased risk of flooding and to improve and protect water quality, in accordance with policies under Section 8.4.0 Sustainable Urban Drainage Systems of the CDP 2016-22 in particular G5 Objective 1 and G5 Objective 2.

6. Green roofs

Prior to the commencement of Development, details regarding the provision of green roofs within the development to be submitted and agreed in writing with the Planning Authority. The green roofs shall be designed so that they contribute to:

- i. SUDS,
- ii. the creation of appropriate and biodiversity

The details to be submitted shall comprise:

- a) identification of the roof areas to be used for the provision of green roofs;
- b) details of the planting to be used; and
- c) details of the maintenance including irrigation.

The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes appropriate provision SUDS and for the protection, enhancement, creation and management of biodiversity in accordance with relevant policies in the CDP 2016-2022

7. Rooftop Gardens/Terraces

Prior to the commencement of Development; details regarding the provision of roof top gardens/terraces to be submitted and agreed in writing with the Planning Authority. The details shall include:

- (i) A revised layout for each of the roof terraces which contributes to privacy for neighbouring occupiers and comfort for users of the roof terraces;
- (ii) Hard and soft landscaping details;
- (iii) Details of measures to address noise levels and wind microclimate;
- (iv) Details of how inclusive access to and within communal rooftop gardens is achieved;
- (v) Details of proposed safety railings

REASON: To ensure that the development achieves safe, comfortable and attractive amenity spaces in accordance with relevant policies in the CDP 2016-2022

8. Taking in Charge

(a) All areas not intended to be taken in charge by the local authority, shall be maintained by a legally constituted management company.

(b) A map delineating those areas to be taken in charge by the Local Authority and details of the legally constituted management company contract, and drawings/particulars describing the parts of the development for which the legally-constituted management company would have responsibility shall be submitted to, and agreed in writing with, the planning authority before any of the residential or commercial units are made available for occupation. The management scheme shall provide adequate measures for the future maintenance of public open spaces, roads and communal areas.

REASON: To provide for the satisfactory future maintenance of this development in the interest of residential amenity

5. Ecological Impact Assessment Report

The recommendations and mitigation measures contained within the Ecological Impact Assessment Report prepared by MWP shall be implemented in full by the applicant.

REASON: To protect and enhance areas of biodiversity, in accordance with policies IE7 Objective 5, G3 Objective 2, G4 Objective 2, HCL15 Objective 3, and other policies relating to Biodiversity within the CDP 2016-2022.

Prepared By: Oisín Egan
Executive Parks Superintendent

Endorsed By: Laurence Colleran
Senior Executive Parks Superintendent

Appendix 5: Water services Report

Register Reference No.: *SHD3ABP-313591-22*

Development:

The proposed development will consist of: (a) the demolition (total area approx. 4,319.9sq.m) of the existing buildings on site and the existing front boundary treatment and (b) the construction of a new residential and mixed use scheme of 242 apartment units in 5 blocks (Blocks A to E) ranging from 4 to 7 storeys in height as follows, Block A (5 storeys) comprising 40 apartments (4 one bed, 31 two bed and 5 three bed units), Block B and C (7 storeys) comprising 102 apartments (45 one bed and 57 two bed units), Block D (5 - 7 storeys) comprising 36 apartments (16 one bed and 20 two bed units), Block E (4 - 5 storeys) comprising 64 apartments (31 one bed and 33 two bed units), Block D will accommodate a Childcare Facility/creche of approx. 476sq.m at ground floor level; the proposal will also provide for a café of approx. 50.9sq.m at the ground floor of Block C; residential amenity areas will be provided in the form of a reception of approx. 125.1sq.m, resident lounge of approx. 45sq.m, a letting office of approx. 11.6sq.m, a rentable room/studio space of 39sq.m, a public gym of approx. 128.5sq.m and a public co-working space of approx. 128.4sq.m, all at the ground floor level of Blocks B & C; each residential unit will be afforded with private open space in the form of a balcony or terrace; public open space is proposed in the form of play areas, courtyards, outdoor seating and planting and pedestrian and cyclist links (approx. 1,580sq.m); a total of 142 car parking spaces are provided at ground floor level, including 5 Accessible spaces at surface level; 426 bicycle spaces (Visitor and Resident in bike stands and secure stacked bike spaces) are proposed; the development shall be served via a new vehicular access point from Broomhill Road; upgrade works are proposed to the vehicular access point to facilitate the proposed development and to provide for improved access and egress for the overall development; new pedestrian and cyclist access points will be provided on to Broomhill Drive from the site; the associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; boundary treatment; internal roads and footpaths; waste storage areas and electrical services and all associated site development works.

Location: Lands at Broomhill Road & Unit 51 Broomhill Road,
Tallaght, Dublin 24
Report Date : 21st June 2022

Surface Water Report:

No objection:

Flood Risk Report:
objection:

No

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

Signed: _____
Adam Adderley-McCabe GE

Date: _____

Endorsed: _____
Brian Harkin SEE

Date: _____

Appendix 6: Housing Report

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

HOUSING DEPARTMENT

Michael Mulhern

Director of Land Use, Planning and Transportation

Dept. of Development, Economic & Transport Planning

DATE 13th June 2022

FAO: Aoife O'Connor Massingham

Re: Reg Ref: SHD3ABP-313591-22

Location: Lands at Broomhill Road & Unit 51 Broomhill Road, Tallaght, Dublin 24

Applicant: Garyaron Homes Ltd

Subject to Contract/Contract Denied

Proposal: *(a) the demolition (total area approx. 4,319.9 sqm) of the existing buildings on site and the existing front boundary treatment; and (b) the construction of a new residential and mixed use scheme of 242 apartment units in 5 blocks (Blocks A to E) ranging from 4 to 7 storeys in height as follows: Block A (5 storeys) comprising 40 apartments (4 one bed, 31 two bed and 5 three bed units); Block B and C (7 storeys) comprising 102 apartments (45 one bed and 57 two bed units); Block D (5 - 7 storeys) comprising 36 apartments (16 one bed and 20 two bed units); Block E (4 - 5 storeys) comprising 64 apartments (31 one bed and 33 two bed units); Block D will accommodate a Childcare Facility/creche of approx. 465sqm at ground floor level; The proposal will also provide for a café of approx. 50.9 sqm at the ground floor of Block C. Residential amenity areas will be provided in the form of a reception of approx. 125.1sqm, resident lounge of approx. 45sqm, a letting office of approx. 11.8sqm, a rentable room/studio space of 39sqm, a public gym of approx; 128.5sqm and a public co-working space of approx. 128.4sqm, all at the ground floor level of Blocks B & C; Each residential unit will be afforded with private open space in the form of a balcony or terrace. Communal open space of 1,797.4sqm is proposed in the form of 2 roof top terraces at Blocks D and E, courtyard space at ground level, outdoor seating and planting and pedestrian and cyclist links; Public open space of 1,400sqm is also proposed in the courtyard area, fully accessible to the general public and includes outdoor seating, paved areas, a lawn area, and play areas in addition to an outdoor seating area to the front of the proposed café at Block C; A total of 136 car parking spaces are provided at ground floor level, including 7 Accessible spaces at surface level; and 426 bicycle spaces (Visitor and Resident in bike stands and secure stacked bike spaces) are proposed; The development shall be served via a new vehicular access point from Broomhill Road; Upgrade works are proposed to the vehicular access point to facilitate the proposed development and to provide for improved access and egress for the overall development. New pedestrian and cyclist access points will be provided on to Broomhill Road from the site; The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; boundary treatment; internal roads and footpaths; waste storage areas and electrical*

services and all associated site development works; The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant development plan; The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.

I refer to the above application for planning permission; Planning Reg Ref SHD3ABP-313591-22 and I wish to advise that a Part V condition should be attached to any grant of permission for this application.

The Part V submission lodged with this planning application is noted. I acknowledge the Part V proposal of 4x1bed, 15x2bed & 5x3bed apartments in Block A. However, the Housing Department is not in a position to confirm acceptance of the proposal as currently set out at this stage. It is South Dublin County Councils preference to acquire a mixture of units on site in line with the overall ratio of units proposed in the development and for the Part V Units, where possible, to be distributed evenly throughout the site to maximise social integration and community sustainability. It is requested that approximately 7% of the Part V units are suitable for persons with medical needs.

The Part V percentage liability is dependent on the date the applicant purchased the subject site and the applicant is required to provide proof of same to the Housing Department.

South Dublin County Council can only agree Part V in respect of the permitted development subject to costing approval from the Department of Housing, Local Government & Heritage. Please note that the Council would require a fully completed Part V submission prior to commenting on costs.

Yours Sincerely,

Rachel Jackson
Administrative Officer
Housing Procurement Section