

SHD3ABP-313606-22– 334 residential units of which 118 will be Build to Rent (BTR) residential units, 4 retail/café/restaurant units and 3 commercial spaces associated with 3 live-work units, and a Childcare facility (144sq.m)

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 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 held on 27/06/2022.
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.

Proposed Development

Demolition of all existing structures on site (with a combined gross floor area of c. 3625sq.m);

The construction of a mixed-use residential development set out in 3 blocks including a podium over a basement, ranging in height from 2 to 13 storeys (with core access above to roof terrace), comprising:

- **334 apartments of which 118 will be Build to Rent (BTR)**,
- with associated amenities and facilities across the development;
- 4 retail/café/restaurant units
- 3 commercial spaces associated with 3 live-work units;

- Childcare facility (144sq.m);
- 670 bicycle parking spaces including 186 visitor spaces;
- 117 car parking spaces (including 6 disabled spaces) at ground floor and basement level;
- Communal space in the form of residential courtyards and roof terraces;
- Public open space provision including Homezone/tertiary route along the south of the site between Belgard Rd and Belgard Square East;
- The overall development has a Gross Floor Area of 29,784 sq.m;
- Of the total 334 residential units proposed, unit types comprise:
 - o Block A (Build-to-Rent),
 - 91 one bed units;
 - 1 two bed 3 person units;
 - 26 two bed 4 person units;
 - o Blocks B & C,
 - 2 live-work studio units;
 - 102 one bed units;
 - 12 two bed 3 person units
 - 88 two bed 4 person units including 5 duplex units;
 - 1 two bed 4 person live-work unit;
 - 11 three bed units;

A portion of the proposed residential development is a 'Build to Rent' scheme in accordance with Specific Planning Policy 7 and 8 as set out in the 'Sustainable Urban Housing: Design Standards for New Apartments (December 2020);

All associated works, plant, services, utilities, telecommunications infrastructure, PV panels and site hoarding during construction; A Natura Impact Statement has been prepared in respect of the proposed development and accompanies this application;

Key Statistics of Development

	Stage 2		Stage 3	
	ABP-311666-21		ABP-313606-22	
Tenure	60% Build to Sell, 40% Build to Rent		60% Build to Sell, 40% Build to Rent	
Total Units	380		334	
Apartments	376	(149 BTR)	331	(118 BTR)
Live-Work Units	4	(1 BTR)	3	(0 BTR)
Unit Mix (Blocks B & C, Build to Sell)				
Studio-Work Unit	2	1%	2	1%
2-bed-Work Unit	1	0%	1	0%
1-Bed	109	47%	102	47%
2-Bed (3-Person)	12	5%	12	6%
2-Bed (4-Person)	90	39%	83	38%
2-Bed (4-Person) Duplex	3	1%	5	2%
3 Beds	13	6%	11	5%

Total Build to Sell Units	230	100%	216	100%
Unit Mix (Block A, Build to Rent)				
Studio-Work Unit	1	1%	0	0%
2-bed-Work Unit	0	0%	0	0%
1-Bed	110	73%	91	77%
2-Bed (3-Person)	1	1%	1	1%
2-Bed (4-Person)	36	24%	26	22%
2-Bed (4-Person) Duplex	2	1%	0	0%
3 Beds	0	0%	0	0%
Total BTR Units	150	100%	118	100%
Unit Mix (Total)				
Studio	3	1%	2	1%
1-Bed	219	58%	193	58%
2-Bed	145	38%	128	38%
3-Bed	13	3%	11	3%
Total Units	380	100%	334	100%
Development				
Site Area (Stated)	0.912	Ha.	0.898	Ha.
Density	417	D/Ha.	372	D/Ha.
Building Height*	2 & 9-16	Storeys	2, 7-9 & 12	Storeys
*Including circulation space and roof garden above.				
Gross Floor Area	32,582	sq.m	29,784	sq.m
Plot Ratio	3.57		3.32	
Site Coverage (Excl. Podium)	38%		38%	
Site Coverage (Incl. Podium)	60%		60%	
Dual Aspect	43%		44%	
Amenity Space				
Public Open Space (Stated)	3114	sq.m	1489	sq.m 17%
Communal Open Space	3159	sq.m	3070	sq.m
- Courtyard Communal Open Space	1767	sq.m 19%	1524	sq.m 17%
- Communal Amenity Spaces (Indoor)	908	sq.m	924	sq.m
- Communal Open Space (Rooftops)	484	sq.m	622	sq.m
Parking				
Car Parking	96		117	
- GF/Basement Residential (Internal)	96		117	
- Creche Set down Spaces	Nil		Nil	
- Commercial	0		Nil	
- Surface	0		Nil	
Residential CP Ratio	0.25		0.35	

Bicycle Parking	742	670
- Residential (Internal)	552	484
- Surface (Visitors)	190	186
Residential Cycle Parking Ratio	1.45	1.45

Procedural Note and Summary of Pre-Planning Consultation

SHD1SPP015/20

The Planning Authority notes that the applicant has engaged in preplanning consultation in relation to the subject site as documented under Reg. Ref. SHD1SPP015/20, held on 8th January 2021.

The proposal was for 380no. units in a mix of build-to-rent and build-to-sell tenures, and 1,000m² of commercial floor space.

Some main points of pre-planning discussion were:

- SDCC will seek to uphold and implement the Tallaght Town Centre Local Area Plan 2020 – 2026.
- Noted building heights in the LAP and need for fine urban grain.
- Site is not a landmark in the LAP, applicant proposes that it should be a landmark (and thus avail of extra height and plot ratio).
- Homezone to south.
- Separation distances between blocks
- Greater mix of uses required in Town Centre. Layout the proposed mix.
- LAP Mix requirement of 30% 3-beds.
- Site should integrate with HeatNet project, and future proofing required.
- Northern Elevational treatments require careful consideration.
- Interaction with Marlet site should be carefully considered, in particular the fact that adjoining junction will be signalised and tighter corners provided. Should the building be brought closer to the corner, or public realm scheme devised to include that corner?
- Tie in to Bus Connects layout.
- Expect a lower parking provision than proposed – a ratio of about 0.3 is provided for nearby. Given build-to-sell element, appropriate ratio here is 0.3 – 0.45. Albeit, if unit mix of 3-beds increases, parking should increase.
- Lay out the parking provision for the commercial element, given here as 1,000m².
- TTA should include analysis of junctions and take account of the signalising of those junctions.
- SUDs encouraged. Green roofs and any biodiversity enhancement measures encouraged.
- Liaise with Air Corps re: flight path to Tallaght Hospital.
- Provide information on microclimatic effects.

The relevant notes are included in the Appendix of this report.

SHD2ABP-311666-21: The applicant lodged a stage 2 pre-application and a tripartite consultation meeting was held on 18th January 2021. In its Opinion prior to the meeting, and in the meeting itself, South Dublin County Council advised the following:

- SDCC will seek the implementation of the Tallaght Town Centre Local Area Plan 2020 – 2026.
- Planning Authority supports the development of the site in principle as per zoning and LAP Sequencing of Development policy.
- At 8-15 storeys, plot ratio of 3.57 and density of 417 units, development exceeds maximum densities specified on the site.
- Development fails criteria for taller development provided for in the Plan.
- Concerns regarding the public open space provision. Ground level POS would be compromised by way of its scale, siting, treatment, and its amenity value, functionality and provision of play areas. Sought consolidation of public open spaces.
- Concerns re: sunlight and daylight to be addressed by applicant. Consolidation of public open space to southern end of site to improve sunlight reception should be considered.
- Higher level of active frontage and town centres uses at ground level sought.
- Smaller commercial units should be located to the west of the site in support of providing a fine urban grain and encourage an active mix of uses, business types and unit frontages.
- 0.35 car parking ratio proposed, SDCC recommend that 0.3 – 0.45 ratio would be more appropriate.
- Scheme should integrate revised layouts proposed to the west and north-west under BusConnects project. Applicant should consider if the vehicular access should be moved given restrictions to private traffic that may be imposed.

Development Context

Description of Site and Surroundings

The site accommodates the three-storey height warehouse unit, occupied by ABB, and is bound to the north, south, and east by roads in the Tallaght Town Centre / Belgard Square area. The site is near TUD Tallaght campus to the east, and vacant sites permitted for extensive development to the north. To the south and west, the site is bound by active light industrial / commercial sites, accommodating warehouses / offices of similar scale to that on the subject site.

Site Area

States as 0.898 Ha.

Note: Stated as 0.912 Ha. at Stage 2.

Site Visits

Various site inspections have taken place in 2020, 2021 and 2022. The most recent took place on Tuesday 28th June 2022.

Zoning

The proposed site is subject to zoning objective: ‘TC’ – ‘To protect, improve and provide for the future development of Town Centres’.

The subject site is located within the boundary of the Tallaght Town Centre Local Area Plan 2020 – 2026, adopted in July 2020. It is located in The Centre neighbourhood area.

SEA Sensitivity Screening

No overlap with the relevant environmental layers.

Note for An Bord Pleanála: The SEA Sensitivity Screening is related to an internal SEA Monitoring framework, which is used by South Dublin County Council to record certain Development Management information relating to monitoring Biodiversity, Flood-plains, Contaminated Soils, Conservation (Built Environment), Archaeological areas of importance, and Landscape

Consultations and Observations

Internal Consultees

Environmental Services (oral consultation)

Housing	Recommends Conditions.
Public Realm	Recommends Conditions.
Roads	Recommends Conditions.

External Consultees

Irish Aviation Authority	Recommends Conditions.
National Transport Authority	Recommends Conditions.
Transport Infrastructure Ireland	No observations.

Irish Aviation Authority

- Include condition to notify the IAA of intention to commence crane operations at least 30 days prior to their erection.
- Agree with the IAA prior to commencement of development regarding placement of aeronautical warning lights.
- Liaise with the Department of Defence to undertake a preliminary screening assessment to confirm that the proposed development and any associated cranes that would be utilised during its construction would have no impact on the safety of flight operations at Casement Aerodrome.

National Transport Authority

- It is recommended that the width of the shared track/path through the public open space corridor along the southern boundary of the development should be of 4m to allow for two-way movement.
- All cycling infrastructure should be provided in compliance with the NTA's 'National Cycle Manual' including the provision of sheltered cycle parking and the provision of identifiable routes through the car parking for cyclist.
- Layout of Belgard Square East should be agreed with the NTA prior to commencement of development.

Third Party Observations

3 no. third party submissions were received, which can be summarised as follows:

Belgard Area Residents Association

- We welcome new residential and enterprise development, but we have concerns regarding overdevelopment in Tallaght Town Centre. Overdevelopment will change the character of Tallaght and downgrade it from its intended status as a county town, to a suburb of the city, i.e. an extension of Dublin sprawl.
- The proposed development does not comply with LAP policy on unit mix.
- Ignores demographics of the local area.
- The development overall has a majority of 1-bed units (57%) which does not comply with SPPR1 of the 2020 guidelines. The development has only 3.3% 3-bed units.
- Families contribute greatly to the creation of community spirit, social cohesion and pride of place, and are not catered for.
- Proposed development does not provide for delivery of a mixed and balanced community as per Objective RE1.
- Proposed development does not provide for 30% of 3-bedrooms as required by Objective RE2 of the LAP, and paragraph 13.5.2 of the Draft County Development Plan.
- Application is considered to mark the launch of an attempt to undermine and set aside the Tallaght Town Centre Local Area Plan.

Tallaght Community Council

NB: TCC submissions on this and another SHD at Broomhill Road appear to either been submitted incorrectly or placed with the wrong file by the Board. The following comments were made in the submission available under SHD3ABP313591-22 but which clearly relates to the subject application (including featuring CGI images copied from the application documentation). There are some general points that are raised in both submissions.

The submission raises the following points:

- 8 SHDs have been approved in Tallaght, 9 more are under consideration.
- Building Height exceeds local standards without adequate justification.
- Does not blend in which surroundings.
- Unit mix is inappropriate.
- Overall, the Tallaght LAP is inconsistent with NPF population projections.
- Permissions should be refused until questions relating to fire safety in high rise buildings – and the resources of the fire services – are answered.

John Conway and 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 impact, car parking, childcare, an architectural conservation area, urban design framework.
- Development does not comply with requirements of SPPRS 1, 2 and 3 of the ‘Guidelines for Planning Authorities or Urban Development and Building Height’ (2019), and the Board is therefore precluded from granting permission.
- A grant of permission by the Board would breach the SEA Directive due to its undermining of the Tallaght Town Centre LAP.
- In relation to EIA, the EIA Screening Report is inadequate and not comprehensive, and the criteria within the report do not comply with regulations or relevant legislation.

- An Bord Pleanála lacks ecological expertise or access to that expertise as required under the EIA Directive.
- The proposed development and documentation provided do not comply with the Planning and Development Regulations 2001 as amended. The information supplied is not adequate to undertake an EIA screening; insufficient detail is provided in relation to impacts on bird and bat flight, impact of same on biodiversity, cumulative impacts with other SHDs in the area, impact of new population on services such as schools/ childcare and health, impact on biodiversity and human health is not adequately detailed, the report is based on an incomplete description of development works, and the proposed development does not comply with BRE guidelines (does not specify which).
- Screening for Appropriate Assessment is inadequate. The Board does not have adequate information to perform a screening. The conclusions of the report do not identify any clear methodology or analysis in respect of making those conclusions. The AA Screening does not consider all aspects of the development, insufficient surveys have been carried out including in relation to bird flight paths, potential collision flight, cumulative impacts with other SHD developments not taken into account, and insufficient site surveys were carried out.
- The AA Screening Report refers to Mitigation Measures in a manner that contravenes the Habitats Directive.

These observations have been taken into consideration as appropriate in the assessment of this application.

Views and Comments of South Dublin County Councillors

The proposed development was presented to councillors at the Tallaght Area Committee meeting on 27th June 2022. The comments provided by elected members are summarised below. Councillors expressed objections to the proposal.

Cllr Dunne

- Objects
- Crazy development
- Tallaght at foot of mountains and beautiful – SHDs like this will destroy Tallaght
- Apartment block of 13 storeys is way too high
- 773 apartments in 3 current SHDs – population increase. Concern re capacity of public transport.
- Level of 3 beds far too low
- Not building a sustainable community – transient community.
- Can not be approved – based on greed

Cllr Sinclair

- Repeat points
- 3 beds too low, needed in area
- Closer to Luas but it at capacity
- Doesn't fit in with community – scale etc
- Good location – poor quality Build to Rent though
- Opposed to it, despite need for housing. Need quality housing, not this.

- Words fail me
- No confidence in ABP decision making

Cllr Holohan

- 3 SHDs – cumulative impact of low parking and PT capacity
- Frustrating to see approach – taking advantage of housing crisis
- Fire safety concerns

Cllr Costello

- Not consideration of people and need for a home
- Parking too low
- Very angry about approach – how can this be allowed?
- Poor visual appearance – horrible impact
- Disrespectful approach to Tallaght – 13 storeys

Cllr O'Connor

- Apartments will change shape again – in negative way
- Fire safety concerns and equipment in fire station
- Objects – Tallaght not ready for this level of development
- All elected members object to proposal

Cllr Duff

- Hard to believe it will be considered by ABP
- Fire safety concern
- 13 storeys is outrageous

Relevant Planning History

Subject Site

S99A/0453

Permission granted by SDCC for alteration, internal extension to first floor warehouse, mezzanine and two storey extension to the side of the warehouse to provide for additional office space and canteen and additional car spaces.

S01A/0509

Permission granted by SDCC for variation to a previously Approved Planning Permission reg. ref. S99A/0453 (for the alteration and internal extension to first floor warehouse mezzanine to provide for additional office space and canteen and additional car spaces). The application is for a change of use from industrial storage space to office space. The subject areas are on the ground and first floor.

Adjoining Site

SHD3ABP-303306-18 @ Junction of Belgard Square North and Belgard Road (Site to the north)

Permission granted by An Bord Pleanála for 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).

Other nearby sites

ABP-308398-20 at 66/67 Forth Avenue, Cookstown, Dublin 24

Demolition of the existing buildings and construction of a build to rent housing development of 252 no. units. An Bord Pleanála **granted permission**, with a condition which reduced overall height in line with the Local Area Plan. (Note previous refusal under 305725 below).

ABP-305763-19 at 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. An Bord Pleanála **granted permission**.

ABP-305725-20 at 66/67 Fourth Avenue

Demolition of the existing industrial buildings (2,518sq.m) and construction of a 'build-to-rent' housing development comprising 245 apartments in a six to eleven storey building over basement. **An Bord Pleanála refused permission** following a recommendation from South Dublin County Council to refuse permission.

SHD3ABP-303911-19 at First Avenue and Cookstown Way

The demolition of 5,500sq.m of existing 1 and 2 storey industrial buildings (including a small operating cafe) and associated site clearance works, and the construction of 150 'Build to Rent' apartments in 3 5-6 storey blocks and 222 Shared Living units in a fourth 6-8 storey (parapet level) block. The proposal provides a total of 725 bedspaces. The proposed development will include a retail/cafe unit of 92sq.m, 64 car parking spaces at grade, communal, public and private open space and communal resident facilities and services, a total of 488 sheltered bike parking spaces split into each block and an additional 98 visitor bike parking spaces at grade. An upgrade to the public realm, to include cycle paths and footpaths along First Avenue and Cookstown road adjoining the site is also proposed. An Bord Pleanála refused permission for the following reasons:

1. Having regard to the location of the subject site within the existing Cookstown Industrial Estate, to the established build form, uses and character of the industrial estate surrounding the site, particularly along First Avenue and Cookstown Way, and having regard to the location of the subject site at a remove from the town centre of Tallaght, it is considered that the development of a residential use at this location, in the absence of an overall strategy for the re-development of the industrial estate, and in the absence of the realisation of planned direct vehicular, and convenient cyclist and pedestrian links, to the town centre and to public transportation, would represent an uncoordinated and haphazard form of development which would give rise to an isolated piecemeal pocket of residential development that is disconnected from shops, amenities and/or residential services, contrary to section 11.2.4 of the current South Dublin County Development Plan 2016 – 2022, and would not be in accordance with an appropriate

sequential development of these Regeneration (REGEN) zoned lands as a whole. The proposal would, therefore, not represent a “plan-led” residential development, would be contrary to the provisions of the statutory Development Plan, and would be contrary to the proper planning and sustainable development of the area.

2. It is considered that the format proposed for the shared accommodation development, with significant numbers of individual units sharing a single common living/kitchen area on each floor, and with a notable shortfall in the quantitative and qualitative provision of sufficient communal facilities, would fail to provide an acceptable living environment for future residents of the development, contrary to the Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, issued by the Department of Housing, Planning and Local Government in March 2018, and particularly paragraphs 5.15, 5.22 and 5.23 of these Guidelines. The proposed shared accommodation development would, therefore, be contrary to these Ministerial Guidelines and would seriously injure the residential amenities of future occupants/residents, and accordingly would be contrary to the proper planning and sustainable development of the area.

SHD3ABP-303803-19 at Unit 5A-C, Second Avenue, Cookstown, Dublin 24

20 no. 2-bed (4-person) apartments. Block B (located in the north-western corner of the site) comprises a total of 50 units, as follows: (a) 6 studio apartments, (b) 16 1-bed apartments, (c) 8 2-bed (3-person) apartments and (d) 20 2-bed (4-person) apartments. Block C (located to the west of the site) comprises a total of 50 units, as follows: (a) 15 studio apartments, (b) 6 1-bed apartments and (c) 29 2-bed (4-person) apartments. Block D (located to the south of the site), comprises a total of 53 units, as follows: (a) 14 studio apartments, (b) 13 1-bed apartments and (c) 26 2-bed (4-person) apartments. Each unit in Block A, B, C & D has associated private open space in the form of a ground floor terrace or a balcony. Additional discussions regarding the proposed development are provided in the architectural drawings, prepared by C+W O'Brien Architects, and the Statement of Consistency & Planning Report, prepared by Hughes Planning and Development Consultants, submitted with the application. An Bord Pleanála granted permission on 25th July 2019.

Approved under Part 8 of the Planning and Development Act 2000

SD208/0012 - Construction of a new Innovation Centre for Tallaght which extends to c 2,980sq.m in a bespoke standalone building on SDCC land east of the new link road connecting Fourth Avenue and Belgard Square North, Tallaght. The scheme comprises: New four storey structure, which will accommodate Town hall, reception and café at street level engaging with new Public Square (which forms separate Part 8 application).

SD208/008 - Development of public realm works totalling approximately 1.2ha at Belgard Square North and on South Dublin County Council lands to the south and north of Belgard Square North, Tallaght including proposed new public space at Innovation Square

SD208/0007

Construction of 133 affordable rental apartments with a community facility (c.12,918sq.m) in three blocks ranging from three to eight storeys with associated balconies/ terrace for each apartment and roof mounted solar panels linked by a single storey podium.

SD188/0010 - A new Energy Centre to provide for a future district heating distribution

network for the South Dublin District Heating Scheme Tallaght. The development will consist of: a new two storey Energy Centre building containing plant-rooms, office and welfare facilities, comprising an internal floor area of c.491sq.m incorporating an ESB substation. The site will be accessed using the existing vehicular entrance off Airton Road. The works also include 2 cylinder water tanks located to the west of the main centre both of which extend to c.5m diameter, and c.8m above FFL and 2 parking spaces for service vehicles along with general landscaping and site works. The preferred routes for Phase 1 of the underground distribution network of the South Dublin District Heating scheme is also set out in this proposal. Decision: Approval.

SD178/0007- (1) Provision of a direct road link between Belgard Square North and the Cookstown Road. (2) A new signalised junction where the new Cookstown Link Road connects to the Belgard Square North. (3) Improvements to pathways, cycleways, crossings and improvements to the quality of the public realm locally. (4) Upgraded public lighting. Decision: Grant Approval

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’ (2020).

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)

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 3.2 The Centre

Key Objectives TC1 to TC15.

Relevant TC Specific Requirements

- Plot Ratio of 1.5:1 to 2:1.
- The height standards set out above may be exceeded in the Centre neighbourhood where they reflect the height of existing buildings, particularly in the core of the town centre proximate to the Luas Terminus and The Square Shopping Centre, subject to Section 2.6.

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

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

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

South Dublin County Development Plan, 2016 – 2022

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.

Policy H6 Sustainable Communities

It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.

Policy H7 Urban Design in Residential Developments

It is the policy of the Council to ensure that all new residential development within the County is of high quality design and complies with Government guidance on the design of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended).

Policy H8 Residential Densities

It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and

surrounding context.

Policy H9 Residential Building Heights

It is the policy of the Council to support varied building heights across residential and mixed use areas in South Dublin County.

H9 Objective 4

To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centres, Mixed Use zones and Strategic Development Zones and subject to an approved Local Area Plan or Planning Scheme.

Policy H10 Mix of Dwelling Types

It is the policy of the Council to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of the Interim South Dublin County Council Housing Strategy 2016-2022.

Section 2.3.0 Quality of Residential Development Policy H11 Residential Design and Layout

It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.

Policy H12 Public Open Space

It is the policy of the Council to ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provides for active and passive recreation and enhances the visual character, identity and amenity of the area.

Policy H13 Private and Semi-Private Open Space

It is the policy of the Council to ensure that all dwellings have access to high quality private open space (incl. semi-private open space for duplex and apartment units) and that private open space is carefully integrated into the design of new residential developments.

Policy H14 Internal Residential Accommodation

It is the policy of the Council to ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.

Policy H15 Privacy and Security

It is the policy of the Council to promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.

Policy H16 Steep or Varying Topography Sites

It is the policy of the Council to ensure that development on lands with a steep and/or varying topography is designed and sited to minimise impacts on the natural slope of the site.

Section 3.13.0 Open Space Management & Use

Policy C12 Open Space

It is the policy of the Council that a hierarchical network of high quality open space is available to those who live, work and visit the County, providing for both passive and active recreation, and that the resource offered by public open spaces, parks and playing fields is maximised through effective management.

Section 5.1.3 District Centres Policy UC4 District Centre

It is the policy of the Council to encourage the provision of an appropriate mix, range and type of uses in District Centres, including retail, community, recreational, medical and childcare uses, at a scale that caters predominantly for a district level catchment, subject to the protection of the residential amenities of the surrounding area.

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.

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

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

Section 9.0: Heritage, Conservation and Landscapes

Section 9.3.1 Natura 2000 Sites

Policy HCL12 Natura 2000 Sites

Section 10.0 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

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

ASSESSMENT

- Principle of Development
- Material Contravention
- Visual Impact, Design and Layout
- Intensity of Development
 - Basic Local Area Plan Standards
 - Justification for Additional Provision
 - Conclusion
- Dwelling Mix
- Residential Amenity
- Public Realm and Ecology
- Access, Transport and Parking
- Water
- Environmental and Safety Considerations

Principle of Development

The Planning Authority is committed to the development and redevelopment of Tallaght Town Centre for residential and mixed-use development, in order of their suitability under the sequencing policy laid out in the Tallaght Town Centre LAP. The site is located in the town centre and would be suitable for redevelopment at this time.

Land-Use Zoning

In the South Dublin County Development Plan 2016 – 2022 the site is zoned ‘TC’ – “To protect, improve and provide for the future development of Town Centres”. The proposed uses (residential, shop, childcare, live-work units) are permitted in principle under this zoning objective.

The Bord should note that the new South Dublin County Development Plan 2022 – 2028 will be effective from 3rd August 2022.

Neighbourhood Function (LAP)

The site is located in ‘The Centre’ neighbourhood. The LAP provides the following description/objective for ‘The Centre’:

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

The land use / urban function is described as “A broad mix of uses in accordance with zoning objectives in the County Development Plan”.

To that end, it is worth considering the objectives under Policy UC2 of the County Development Plan regarding Town Centres. This policy promotes a concentrated mix of units within the town centre, in particular the core retail area (this site is not in the core retail area).

The residential development with ground floor provision for commercial units and a creche is acceptable in principle.

Infrastructure

The LAP outlines the following physical infrastructure in ‘The Centre’ for which responsibility falls jointly or primarily to developers:

- Enhanced public realm, including improved connectivity to public transport nodes.
- Transport Hub and Interchange within area identified in the Urban Design Framework for this Plan or as otherwise agreed with the Agency Leads.
- Explore the feasibility of uplifting the River Poddle and incorporating into public realm, open space and green/blue infrastructure asset strategies as part of proposals for development.
- Pocket park serving a varied amenity function to be developed alongside the re-development of the former Uniphar lands along Belgard Square North to serve emerging residential population. Pocket Park to be provided in a phased manner alongside the development of these lands to the north east of the town centre.
- 1no. new community space required per 5,000 population growth (c. 2,000 units) in the Town Centre or Cookstown neighbourhoods. The demand for, and delivery of, this facility will be assessed once 1,500 units have been granted planning permission in the Town Centre and Cookstown neighbourhoods.
- The indicative long-term unit growth for the area would generate a minimum requirement for 270 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.
- Primary medical care and other services such as GP’s will be facilitated on an ongoing basis in consultation with the HSE to support population growth within the Town Centre. The delivery of such facilities will be demand driven as the area develops. The SIA indicates an average of 1.79 GP’s/1000 population should be provided.

Further to the above, SDCC infrastructure upgrades are identified in the local area. Development contributions will in part fund these upgrades, which shall in turn facilitate the improvement of the area for residential development. The scheduling of the infrastructure requirements in Section 3.2 are noted and it is considered there are no specific requirements in tandem with the development of this site and no specific exceptional costs in respect of public infrastructure and facilities which benefit the proposed development.

Sequencing

The site is located in ‘The Centre’ and is thus considered to be suitable for development as per Chapter 8 of the Local Area Plan.

Material Contravention

The Planning Authority note the submission by the applicant of Material Contravention Statements relating to the Tallaght Town Centre Local Area Plan 2020 – 2026, the South Dublin County Development Plan 2016 – 2022, and the Draft County Development Plan 2022 – 2028.

Section 37(2)(b) of the Act states that where a proposed development materially contravenes the development plan, the Board may grant permission where it considers that:

- (i) the proposed development is of strategic or national importance,
- (ii) there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned, or
- (iii) permission for the proposed development should be granted having regard to regional spatial and economic strategy for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government, or
- (iv) permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan.

The following material contraventions are highlighted in the applicant's statements:

- The development exceeds the LAP height requirements.
- The development exceeds the LAP plot ratio requirements.
- The development does not comply with LAP unit mix requirements, specifically Objective RE2 of the LAP, which requires a 30% provision of 3-bed units in Tallaght Town Centre, and Objective RE5, which requires BTR developments to support the housing mix identified in policy Objective RE2.
- The development does not comply with CDP policies which support the implementation of Local Area Plan policies on height and density.
- The development would not comply with Draft CDP policies which support the implementation of Local Area Plan policies on height and density.
- The development would not comply with the Draft CDP policy on provision of a variety of housing types, sizes and tenures (Policy QDP10 Objective 1).

The Planning Authority consider that criteria (i), (ii), (iii) and (iv) of the above legislation does not apply to this development. The Tallaght Town Centre Local Area Plan 2020 – 2026 was adopted in July of 2020 with carefully considered provisions relating to building height, unit and tenure mix, and was subsequently reviewed by the Office of the Planning Regulator at Draft and Final stage. In relation in particular to ministerial guidelines, the applicant proposes that the LAP should be set aside to satisfy s.28 Ministerial guidelines regarding building height and unit mix.

In terms of unit mix in particular, it should continue to be noted that the Tallaght Local Area Plan 2020 – 2026 was produced in the aftermath of the introduction of the 'Sustainable Urban Housing: Design Standards for New Apartments' (2018) (now updated to 2020), but prior to the publication of HNDA guidelines. It is in the spirit of the apartment guidelines that the Tallaght LAP was the subject of an interim study to establish local demand for housing, which informed the policies set out in the LAP.

The Planning Authority does not agree that any of the criteria under section 37(2)(b) of the Planning and Development Act 2000, as amended, apply in this instance.

It is considered that the development represents a material breach of the Local Area Plan standards for height, plot ratio, tenure mix and unit mix. The Planning Authority cannot support the development in its current form on this basis. As such, the Planning Authority advised at stage 2 that the development should be:

- Reduced in height to 7 storeys + 1 set back as per the Plan;
- Reduced in terms of overall plot ratio to 2.5;
- Provision of 3-beds should increase to 30%.

In terms of unit mix, however, the proposal is seriously detached from the letter, spirit and ambition of the Tallaght Town Centre Local Area Plan 2020 – 2026, providing 3% of units as 3-bed residential units. The proposal is also similarly detached from similar policy requirements contained in the Draft South Dublin County Development Plan 2022 – 2028.

Given the provision of one-tenth of the sought number of 3-bed units in the LAP, permission should be **refused**.

Visual Impact, Design and Layout

Visual Impact

The applicant has provided CGI verified views of the development and included impressions of the permitted scheme to the north. The proposed material treatment is considered to be generally acceptable, subject to submission of and agreement to final details by **condition**. Given its location, and despite its height, the proposed development would not be particularly overbearing on existing development sites.

It is noted however that the lands are zoned ‘TC’ and that, under the LAP, it is expected that other sites in the vicinity may be redeveloped for residential, mixed-use or commercial town centre uses, and so development cannot prejudice other sites by way of overbearing impact.

Urban Grain, Own-Door Access and Size of Commercial Units

Urban grain is essentially a description of the pattern of plots in an urban block. Fine urban grain occurs where this pattern is dominated by smaller plots. Fine urban grain can provide a more diverse mix of uses, mix of ownership, mix and density of businesses, density of evening uses and active street uses.

In this instance, separate ownership and provision of modest units to serve the local area should be preferred to the south and west of the development.

As at Stage 2, the Planning Authority would recommend:

- Units on the southern tertiary street should have own-door access at ground level, with appropriate terrace and privacy strip.
- Commercial units to the west of the site should be presented in design terms and should be functionally capable of being subdivided into smaller units for separate lease or sale.

The design is not considered to have responded to this point; such details can be the subject of a **condition** of permission.

General Layout and Sunlight/Daylight Analysis

The general layout of the scheme is acceptable. The Planning Authority notes that the central spine of the scheme is not provided for in the Local Area Plan indicative maps. At Stages 1 and

2, the Planning Authority expressed concern about the layout only to the extent that it might compromise the sunlight and daylight reception of the open spaces and units.

The applicant has provided a Daylight and Sunlight Assessment provided by 3D Design Bureau. The assessment is comprehensive and, following recent updates to European standards and the British Standard (BRE) equivalents studies, the development in accordance with 3 standards: BS 8206-2, EN 17037 and BS EN 17037. EN 17037 reflects the new European standard for daylight in residential developments and is the highest standard. BS EN 17037 is an adapted (lower) standard for northern latitudes, which professional and industrial parties have proposed as a reasonable adaptation of the European daylight standard. By this standard, 48 of the proposed units – 14% of the total – have one or more habitable rooms that do not meet the minimum standard for daylight. There are more ‘substandard’ units when recording against EN 17037.

Block A contains 18 of the 48 units, mostly east-facing, at levels 00 to 05. The central Block, Block B, contains 25 such units at levels 00 to 04. There are 5 west-facing units in Block C at levels 00 and 01 which do not meet the standards.

The report further states that given the higher than necessary 44% dual aspect ratio on the site, the issue has been mitigated. The vast majority of units which do not meet the BS EN standard are single aspect, so it is unclear how the below-minimal daylight levels inside these units is being mitigated.

The report notes that considering the target density, the results are good. The target density is above the intensity sought in the LAP in both height and plot ratio terms. There is no mitigation or justification on this basis.

The report states that some design changes would be needed to improve compliance, and suggests the use of smaller units. The units affected are mostly small or close to minimum as per the 2020 apartment guidelines. Given the configuration of these mostly single aspect units at the lower levels of Blocks A, B and C, it may be possible to amalgamate units and provide shallower but still adequately sized habitable rooms. This would lead to a loss of units on some of these lower floors. The Board should consider such a **condition** in the event of a **grant of permission**.

It is considered however that the poor results for 14% of units reflects that the design of site may need slight alterations to provide more dual aspect or south-facing units, or else more slender blocks to improve separation distances and reduce shadow impacts. With 14% of all units affected, the issue of daylight and sunlight is considered to have a detrimental impact on potential residential occupation of the development. This should be considered a **reason for refusal**.

ESB Substations

The location of ESB substations fronting directly onto the street to the north is not supported. Final agreement of the location of these facilities and the elevational treatment to Belgard Square North should be agreed by **condition** in the event of a grant of permission.

Layout of Commercial Uses

The applicant has rearranged the commercial units to face west onto Belgard Square East, as per the LAP scheme on mixed use frontages. This is welcomed.

Open Spaces

The layout of open spaces is broadly acceptable to the Planning Authority at the most general level; however, there are a number of issues with the proposal.

The Planning Authority welcomes the provision of a larger pocket park to the south of the development. The elevational treatment (blank undercroft façade) is not considered appropriate and would contribute to an absence of passive surveillance at a key location. Additional residential units or smaller commercial units should front onto this space – this may require the removal of car parking spaces to the rear. The final layout should be agreeable **by condition** in the event of a grant of permission.

The general layout provides for quality communal amenity space between the three blocks. In terms of communal open space, this is a generous and quality provision of amenity space.

The tertiary street to the south of the development is counted by the applicant as being open space. This is considered in the LAP to be a street and as per its function and form, the Planning Authority does not consider it to constitute public open space for the purposes of calculating the public open space available on the site.

The pocket parks to the north were raised by the Planning Authority at Stages 1 and 2, with concerns raised both for their functional amenity value and the sunlight penetration to ground. The Daylight and Sunlight Assessment confirms that these spaces will get very little sunlight, and the shadow study included in the report illustrates that they will mostly be in shadow. Unfortunately, the report does not break down the results for these spaces and provides an erroneous figure of 73% of all public open space receiving 2 hours of sunlight on March 21st – this figure is based on all streets around the development being recorded as ‘public open space’. These concerns combine to suggest that while the spaces may be suitable for additional street furniture, the amenity value of the spaces will be compromised.

Overall, it is considered that some design changes are required to ensure the best possible layout for the southern pocket park. Details of this should be agreed by **condition**. Additionally, the Planning Authority discounts the tertiary street (excl. pocket park of approx. 300sqm) and the northern ‘pocket parks’ as being public open space to serve the development. As such, a **development contribution in lieu should be levied** as per section 2.7.2 of the Tallaght Local Area Plan 2020 – 2026. This contribution would amount to €448,500 as per section 10 of the South Dublin Development Contributions Scheme 2021 – 2025.

Integration with the Adjoining

The applicant has shown (via engineering drawings) the relationship between the scheme and the new street layout proposed to the west and north-west by way of Bus Connects layout changes. The National Transport Authority has stated that the proposals are an acceptable outline proposal and that detailed design of Belgard Square East should be agreed with the NTA and this should be a requirement of a condition of permission.

It is noted that the engineer’s drawing (No. 0015) provides for a right turning lane into the development for traffic approaching from the south, which would widen the carriageway as compared to the latest layout issued as part of the BusConnects project. Widening the carriageway and reducing pedestrian space in front of the shops should be carefully considered, and the final layout should be fully compliant with DMURS and have regard to the function of

the street in the LAP – a mixed use secondary street which should be expected and encouraged to have higher pedestrian footfall than other streets in the immediate area.

A **condition of permission** should be attached regarding NTA agreement and South Dublin’s agreement that the final layout supports DMURS and the urban framework of the LAP.

Belgard Road, to the east, not shown to be affected by the proposed layout, and the red line application boundary does not extend to Belgard Road. Currently this side of Belgard Road has sites that open onto the street, and the character of the road will be transformed by the development. It is reasonable to seek that a cycle lane is installed alongside Belgard Road on the northbound side, to tie in with the BusConnects proposed layout at the junction of Belgard Road and Old Blessington Road, and to support the objective for a secondary cycle route under the NTA’s Greater Dublin Area Cycle Network Plan and the current and adopted draft County Development Plans. A cycle lane at this location should be agreed by **condition** with the NTA and South Dublin County Council, and be delivered by the applicant.

Intensity of Development

Density

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. The LAP provides criteria for building beyond the Plan standards, and also provides for the provision of ‘landmark’ buildings at certain sites in the Plan lands. The subject site is not identified as a landmark site in the Plan.

The proposed density is **371 dwelling per Ha.** The site is located in a ‘central and/or accessible location’ as per the 'Sustainable Urban Housing: Design Standards for New Apartments' (2020) and is therefore considered suitable for high density development.

Local Area Plan Basic Standards on Height and Plot Ratio

Height

The proposed development is 2, 7, 8, 9, 11 and 13 storeys in height, with a rooftop garden and circulation area above. The development steps down to the south and west generally, with some provision of 2-storey development fronting directly onto the tertiary street to the south.

Block A is located to the west of the site. It is 7 – 11 storeys from south to north, with some setback at level 09 (10th storey). As per the LAP, this block should be 6 storeys to the south, +1 storey set back, and 7 storeys to the north, +1 storey set back.

Block B is the central block within the site. It is 8 storeys to the south and 9 storeys to the north, with a simple mid-block transition. As per the LAP, this block should be 6 storeys to the south, +1 storey set back, and 7 storeys to the north, +1 storey set back.

Block C is the eastern block. It is 8 & 13 storeys from south to north, with a minor setback at 10th storey level (level 09). As per the LAP, this block should be 7 storeys, +1 storey setback.

Some duplex units front onto the southern street between blocks B & C and is 2 storeys in height. The podium parking and open space otherwise would serve to provide single-storey frontage in the gaps between the three blocks.



Extract from Tallaght LAP Building Height Strategy

The proposal breaches the standard heights in the LAP generally, with heights of 8 storeys generally considered permissible fronting onto Belgard Square North and Belgard Road (6-7 storeys +1 setback). Development of heights 4-6 storeys +1 setback is permissible to the south and west of the development. Therefore, those elements of the development at 9 storeys or above **significantly exceed the basic height standards of the LAP**, as do the heights fronting onto the southern tertiary street in Blocks A and B.

Plot Ratio

The plot ratio limits for the Centre parcel are 1.75:1 to 2.5:1. This higher plot ratio standard reflects the urban hierarchy of Tallaght Town Centre as envisaged and laid out in the Local Area Plan. The applicant has stated a plot ratio of 3.32, based on a site area of 0.912 Ha. The proposed plot ratio **significantly exceeds the basic plot ratio standard found in the LAP by 33%**.

Justification for Additional Provision

The Tallaght Town Centre Local Area Plan 2020 – 2026 provides several criteria for additional heights and/or plot ratio.

Criterion 1: Sites Identified in the Plan

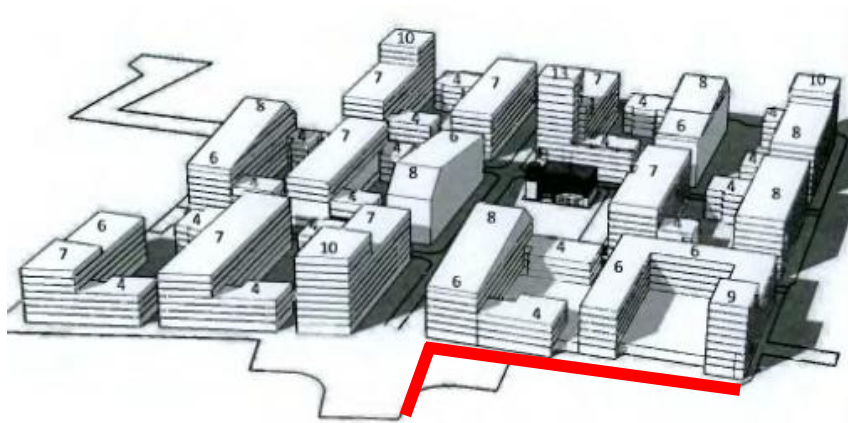
Some sites are identified in the plan as being suitable for taller development of 2-4 storeys above the standards identified on the Plan maps (Figure 2.4 of the Plan and as per section 2.6, page 29). This site is not identified as a landmark site suitable for higher development.

Criterion 2: Other Sites in The Centre

Section 3.2 of the LAP contains the following local policy on height:

“The height standards set out above may be exceeded in the Centre neighbourhood where they reflect the height of existing buildings, particularly in the core of the town centre proximate to the Luas Terminus and The Square Shopping Centre, subject to Section 2.6.”

As noted at Stage 2, the criteria in section 2.6 relate to transport frequency among other measures. A limited uplift in height to match tower elements in the Marlet site (ABP-303306-18) could be justified on this basis. Such an uplift would allow for a 9-storey element at the north-east corner of the subject site, and a 10-storey element at the north-west corner. Concerns are raised that the Marlet site has not commenced and may not come forward to be an existing building.



ABP-303306-18 Masterplan Statement Extract. Interface with subject site shown in red.

The criteria in relation to additional height are set out in section 2.6 of the Plan, as follows:

“To reflect the importance of placemaking at key public transport stops and key public spaces, flexibility in relation to the plot ratio range and the potential for higher buildings (2-4 storey increase on typical levels set in the LAP) may be considered at certain locations which are considered to be key or landmark sites, subject to exceptional design which creates a feature of architectural interest, a significant contribution to the public realm at these locations and mixed uses at ground floor level. These requirements are subject to criteria for taller buildings set out in Section 2.6.2. This provision may apply where the site is directly adjacent 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.

This provision will only apply to the extent of a site which is within 100m walking distance of the above locations and will only be considered where the Planning Authority is satisfied that provision of the above facilities will be achieved.”

Criterion 3: Significant Public Gain

Section 2.6.1 of the Plan provides guidance as to when additional plot ratio can be provided:

Flexibility in relation to the gross floor area of up to 20% of the plot ratio ranges may generally be applicable where there is a strong design rationale for an increase in density/height and the development will result in a significant public gain.

A significant public gain includes:

- The dedication of part of the site for public open space including parks and plazas, above the standard 10% requirement for public open space on site.
- The creation of streets and links that provide access through and access to a site.
- Major upgrades to streets surrounding the site including works such as street widening, new enhanced junctions and crossing points and realignments.
- Provision of community and/or cultural amenities that will significantly contribute to the social infrastructure in the area; and/or
- Other public domain works or improvements to be agreed with the Council.

For clarity, a significant public gain does not include minor public domain works (such as paving upgrades or the planting of street trees) or other works that are required by the various standards contained within this plan (such as high quality materials) or Guidelines. The plot ratio ranges and additional 20% floorspace bonus shall normally be calculated on the basis of the gross site area.

The development provides for a tertiary-grade non-vehicular street through the development. This would be a tertiary street as per the LAP urban framework, which would be a suitable grade in terms of both engineering and urban hierarchy, based on the linkages through and scale of the other roads on this site.

Some flexibility in plot ratio can be considered given the provision of this street.

Conclusion: Height and Plot Ratio

In height terms, the maximum height generally on this site would be 7 storeys development +1 storey setback, to the north and east of the development, and 6 storeys, +1 setback, to the south and west.

A reduction of the heights and introduction of setbacks on the site to match these requirements would bring plot ratio to approximately 2.5.

Given the prevailing height as permitted on the Marlet site, and given the location of this site with the provision of BusConnects routes in close proximity, and its location in the town centre, some flexibility for height and plot ratio is considered to be appropriate as per the LAP. This can be provided by way of corner uplifts and allowing for full additional storeys rather than setbacks to the north and east (where setbacks would do little to screen the development). To the south, where future development is likely to be located in closer proximity, based on the urban framework of the LAP, setbacks should be maintained. Recommended alterations are therefore:

- 8-storey development without setbacks generally to the north and east;
- 6 storeys, plus 1 setback from the southern boundary, for the southern ends of Blocks A and B.
- A single storey uplift at the north-east corner to 9 storeys.
- 2 storeys uplift at the north-west corner to 10 storeys.

This requires:

- Reduction in the height of Block A tower unit, reduction of the level 08 (9th storey) elements by 1 storey, and provision of a setback by way of omission of two southern-most units at level 06 (7th storey).
- Reduction in the height generally of Block B by one storey and provision of setbacks to the south.
- Reduction in the height of the corner tower in Block C to 9 storeys, and reduction otherwise of Block C to 8 storeys.

The above is estimated to reach a plot ratio of approx. 2.77, or 11% above the LAP requirements. This is considered reasonable given the flexibility applied in terms of height.

This represents an overall reduction on the proposal as applied for, while providing additional height and plot ratio above the standards in the LAP, but in accordance with the flexibility criteria in the LAP. The Board is invited to apply these changes **by condition, in the event of a grant of permission.**

Noting that there are other issues with the development, the height and plot ratio applied for, which are in excess of the LAP standards and not justified by LAP flexibility policies, can constitute a **reason for refusal.**

Development Mix

Unit Mix

The proposed development provides for the following mix of units:

Studio (live work)	2	1%
1-Bed	193	58%
2-Bed, 3-person	115	35%
2-bed, 4-person	13	3%
3-Bed	11	3%
Total Units	334	100%

The Planning Authority notes the very small allocation of 3 bed units. If the proposed proportion of 3+ bed units (3%) were implemented across the LAP lands, this would equate in the short-term to no more than 330 units being constructed in the long-term, across the plan lands. The provision of only 3% 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.

The proposed development does not comply with Objective RE2 of the Tallaght Town Centre Local Area Plan 2020 – 2026, which requires 30% provision of 3-bed units in all developments, and Objective RE5 of the Plan, which makes support for Build-to-Rent schemes conditional upon provision of 3-bedroom units. Non-compliance with a specific written objective of the Local Area Plan is sufficient reason to recommend a refusal of permission.

It is further noted that the LAP, as reviewed by the Office of the Planning Regulator, 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 requirement for 3-beds has also been reiterated in the adopted County Development Plan, in section 13.5.2. The Housing Strategy and Interim HNDA contained within Appendix 11 of the draft South Dublin County Development Plan 2022 – 2028 carries out an evidence-based assessment for the County up to 2028. In recognising the need to provide more family type housing within new apartments, the quantum of extant planning permissions with one and two bedroom units, and potential impact high concentrations of mono type housing has on areas, especially in regeneration area, the new County Development Plan sets a benchmark for 3-bedroom units of 30% in new residential developments.

Notwithstanding Objective RE2 of the Plan, the proposed development is also in direct breach of SPPR 1 of the ‘Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities’ (2020), by providing more than 50% of units as studio and 1-bed apartments (55% in this proposal). The applicant has stated that unit mixes do not apply to BTR development under SPPR 7. SPPR 7 states:

“No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise”. SPPR 1 clearly specifies limitations on dwelling mix for all schemes. This contradiction within the Ministerial Guidelines creates a difficulty for those assessing such schemes, but in this case it should be noted that the main issue for the Planning Authority is the lack of 3-bed units, in contravention of the LAP.

The shortfall of 3-bed units in this development is so severe, that a grant of permission would seriously undermine the adopted policy of the council for Tallaght and South Dublin County, and undermine in particular the delivery of development under the Local Area Plan and County Development Plans. These plans have been prepared with the assistance of a preliminary study in the case of the LAP, and an Interim Housing Needs Demand Assessment in the case of the County Development Plan; the provision is to be reviewed upon the completion of a HNDA for Dublin.

It is the opinion of the Planning Authority that the proposed development should be **refused permission** on the basis of the shortfall of 3-bed units and overproliferation of 1-bed units in the proposed development, the detrimental precedent and direct impact that granting

permission would have on the development and redevelopment of Tallaght under the LAP, and the impact on the delivery of housing policy in South Dublin County under the adopted South Dublin County Development Plan 2022 – 2028, and thus, that such development would be contrary to the proper planning and sustainable development of the area and the county.

If the Board is minded to grant permission notwithstanding the above concerns, a condition of permission should seek that a reconfiguration of units internal to the envelope of the scheme is agreed by **condition**, to raise the total number of 3-bed units up to 30% of the development.

Tenure Mix

The proposed inclusion is not supported under Objective RE5 of the LAP as the proposed unit mix does not comply with Objective RE2. With a higher mix of 3-beds, build-to-rent development would be supported under the LAP.

Public Housing: Part V

The Housing Department has provided a report noting the requirement for 10% provision of public housing units within the scheme. The Housing Department advises that the applicant's proposal for an enhanced lease agreement is not acceptable as per South Dublin County Council policy to acquire units on site.

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The recommendation is therefore to include a condition which would enable the council to purchase 10% of the built units in accordance with s.96(3)(b) of the Planning and Development Act, 2000 as amended.

The report also seeks that 7 of the units are suitable for persons with medical needs.

Residential Amenity and Facilities

Room and Unit Sizes

The proposed units appear to meet or are within 5% variance (in very few cases) of the minimum size standards contained in the 'Sustainable Urban Housing: Design Standards for New Apartments' (2020). As per section 3.8 “Safeguarding Higher Standards” of the guidelines, 51% of the apartments which are build-to-sell meet 110% of the minimum size standards.

Dual Aspect

44% of the units are dual aspect. This is considered to be satisfactory in a town centre under the 'Sustainable Urban Housing: Design Standards for New Apartments' (2020).

Amenities and Facilities

Residential Facilities

Residential facilities are provided as per SPPRs 8 and 9 of the 'Sustainable Urban Housing: Design Standards for New Apartments' (2020). There are no particular standards against which such facilities should be assessed, and no obvious issues appear to arise.

Childcare Facilities

The proposed crèche is of sufficient size to serve the development, notwithstanding that this

reflects the very large overprovision of 1-bed units in the development.

Public Realm and Ecology

The Public Realm Department has provided a report, which is available in the appendices.

The report recommends that the pocket parks be consolidated into a single park providing a connection between the north and south of the development. This would essentially mean converting one of the communal podium spaces into public amenity space. The Planning Authority does not consider this amendment feasible at this stage. The Planning Authority is recommending a contribution in lieu of public open space, with only the southern pocket park (approx. 300sqm) considered to provide quality public open space.

The Public Realm report comments on the lack of SUDs features relative to the scale of the development, and lack of appropriate calculations.

The report lists some required specifications for planting, and notes the lack of play equipment proposed.

In all, the report recommends the following conditions:

- Agree revised landscape proposals
- Improve, increase, and soften the public open spaces
- Pedestrian access to public open spaces to be available 24 hours a day, with no gates to the development, and all areas to be fully completed and open to the public prior to occupation of the development
- Clarification and agreement of play equipment
- A Comprehensive SUDs management plan to be agreed.
- Taking in Charge to be agreed.
- Green Roofs to be agreed.
- Rooftop gardens, details to be agreed.
- Biodiversity enhancement, measures to be agreed.
- Landscape Management and Maintenance, plan to be agreed.

The proposed conditions are considered appropriate.

Ecology

The applicant has provided an Ecological Impact Assessment. The report finds that no bats have been recorded on the site and this is backed up by a recent survey. The report also finds that no mammal or reptile species of concern were found on the site. Herring gulls were noted on the site but not noted to be nesting. The report proposes pre-demolition surveys for roosting bats and nesting birds.

The applicant has provided a Natura Impact Statement which further comments on surface water, flood risk, and potential impact on sensitive receptors. The Board is the competent authority in this regard.

Access, Transport and Parking

The Roads Department report provides the following 6 recommendations:

1. The applicant is requested to contact the Dublin Cycle South office directly and coordinate any future proposals for cycle infrastructure in the area.
2. The applicant should provide segregated cycle infrastructure to link with any existing or proposed along all frontages of the proposed development.
3. Refuse collection from this development should not be from the public realm on Belgard Square North, all refuse collection should be contained within the curtilage of the development
4. The loading/servicing areas on Belgard Square North should be removed from the public realm, the loading and unloading of vehicles should be contained within the development. The areas highlighted in blue on the Taking in Charge drawing are in public ownership and cannot be surrendered to a management company.
5. The undercroft parking spaces if not conforming to SDCC recommendation of 2.5m width then should confirm to DMURS of 2.4m wide.
6. The balconies that overhang the public realm along Belgard Road and the doors that open out on the public space should be reconsidered.

These conditions are noted and are recommended in the event of a grant of permission.

Water

The Environmental Services Department has sought clarification of information on SUDs measures and soil percolation. These issues can be incorporated into a condition on SUDs.

Environmental and Other Considerations

Aviation

The applicant has provided an Aeronautical Assessment Report. This report concludes that the proposed development complies with all aviation and aeronautical requirements which might affect the site. The applicant has liaised with the Department of Defence and commits to complying with all recommendations made by the department on 5th May 2021. This can be a **condition of permission**.

Taking in Charge

The applicant proposes that much of the development be taken in charge, with only some loading bays on Belgard Square North to be managed by a management company. Though not shown on their taking in charge map, it is considered necessary that the communal amenity space at podium level also be managed by a management company.

The SDCC Roads Department describes the loading bays on Belgard Square North as being in SDCC's ownership, and further states that they cannot therefore be transferred to a management company. The Roads Department further seeks their removal altogether, suggesting that all loading take place from inside the development (i.e., the undercroft car park).

Screening for Appropriate Assessment

The applicant has provided an Appropriate Assessment Screening Report and a Natura Impact Statement. An Bord Pleanála is the competent authority for the carrying out or screening for Appropriate Assessment.

Environmental Impact Assessment Report

The applicant has provided an Environmental Impact Assessment Screening Report, and a Statement under Article 299B of the Planning and Development Regulations. An Bord Pleanála is the competent authority in relation to carrying out an environmental impact assessment.

Other Considerations

Special Development Contribution Consideration and Calculation

Public Open Space on the Site

The Planning Authority has judged in this instance that the public open space provided for in this development is the pocket park to the south of the development. This pocket park is calculated at an area of 300 sqm (measured from drawings). The proposed development does not provide for the required minimum public open space as per Section 2.7.2 of the LAP, which sets out that a minimum of 10% public open space should generally be met on site by the developer.

Section 2.7.2 of the Local Area Plan provides that where the site is considered by the planning authority to be too small or inappropriate to fulfil useful purpose in this regard, then a financial contribution towards provision of public open space in the area, SDCC improvements to an existing park and/or enhancement of amenities shall be required.

Under article 10 of the SDCC Development Contributions Scheme 2021 - 2025, this contribution is to be levied at a rate of €7.5m per hectare of open space required.

Special contribution is calculated as follows:

	Sqm.	Ha.	Charge
Rate per Ha.	10,000	1.000	€ 7,500,000.00
Site Area	8,980	0.898	
10% POS Required	898	0.090	
POS Provided	300	0.030	
POS Balance required	598	0.060	€ 448,500.00

Conclusion

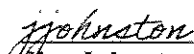
The Planning Authority's adopted Tallaght Town Centre Local Area Plan 2020 - 2026 and adopted South Dublin County Development Plan 2022 – 2028, each specify a unit mix far separated from what has been proposed by the applicant. The material contravention in relation to unit mix – whereby 3% of the proposed units are 3-bed units – is considered to be an issue which would, if left unresolved by way of a grant of permission, undermine the adopted policy of the council and the delivery of sustainable residential development under the LAP (adopted in 2020) and the Draft County Development Plan (adopted in 2022).

Other reasons for refusal are given below, though conditions to overcome these difficulties are proposed in Appendix 1.

It is recommended that the **development is refused** for the following reasons:

- (1) The proposed development, containing 13 no. 3-bed units out of a proposed total of 334 units, would be a material contravention of a specific Local Area Plan objective (Objective RE2), and a specific objective of the County Development Plan (Policy H1 Objective 13, as supplemented by section 13.5.2). The proposed development would, if granted permission, undermine the creation of a sustainable and mixed residential community in the town centre area of Tallaght, and would undermine the delivery of sustainable residential development under the auspices of the Local Area Plan in the Tallaght area and the County Development Plan in the county generally, and would therefore be contrary to the proper planning and sustainable development of the area.
- (2) The proposed building heights of 7-8 storeys to the south and west of the development (without setbacks), and 9-13 storeys to the north and east of the development, contravene the Tallaght Town Centre Local Area Plan 2020 – 2026, and are not justified under the flexibility criteria provided for in the Plan. The Local Area Plan provides for design, context and function-based judgements on the appropriate height of new developments, as per the 'Guidelines for Planning Authorities or Urban Development and Building Height' (2019).
- (3) 48 (14%) of the proposed residential units contain 1 or more habitable rooms which would not receive adequate levels of daylight as per BS EN 17037 standard, and the development would thus represent inferior residential amenity value for a significant minority of residents and would be contrary to the proper planning and sustainable development of the area.

Colm Maguire, Executive Planner



Jim Johnston,
Senior Executive Planner



Eoin Burke
Senior Planner

Date: 12/7/22

APPENDIX 1: RECOMMENDED CONDITIONS OF PERMISSION

No	Condition	Reason
1	<p>Effective control on development as approved</p> <p>The development shall be carried out and fully completed in its entirety in accordance with the plans, particulars and specifications lodged with this planning 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>Modifications to the Development</p> <p>No development shall take place under this permission until the applicant, owner or developer has submitted for written agreement of the Planning Authority, revised plans, elevational drawings, cross-sections and a revised schedule of accommodation and housing quality assessment, incorporating all of the following amendments:</p> <p>(a) Building Heights shall be modified as follows:</p> <ul style="list-style-type: none"> - Block A shall be divided between a 6-7 storey southern element and an 8-10 storey northern element, to be achieved by reduction in height of the proposed corner tower, omission of units 1308 and 1309. - Block B shall be reduced by 1 storey generally, and in addition units 2607 and 2608 shall be omitted. - Block C shall have a height of 8 storeys except at the proposed tower element, where it shall have a height of 9 storeys, and circulation space and roof garden above. <p>(b) Apartments at Ground Floor to Level 05 in Blocks A and B to be reconfigured to reduce the number of units failing to meet BS EN 17037 daylight standards. The affected units are 1102, 1103, 1104, 1105, 1106, 1202, 1205, 1206, 1302, 1305, 1306, 1307, 1402, 1405, 1406, 1407, 1502, 1506, 2103, 2104, 2108, 2109, 2111, 2204, 2208, 2209, 2210, 2211, 2303, 2304, 2305, 2308, 2309, 2310, 2311, 2312, 2409, 2410, 2411, 2509, 2510 and 2511. This reconfiguration may result in a loss of units.</p> <p>(c) The final layout and elevation treatment (i) at ground floor on Belgard Square North, and (ii) at ground floor facing into the pocket park to the south of Blocks A and B, shall be agreed with the Planning Authority prior to commencement of development. In relation to (ii), the provision of additional ground floor / duplex units is encouraged in place of parking.</p> <p>(d) The pedestrian and cycle path along the southern tertiary street shall be at least 4 metres in width</p> <p>(e) Ground floor units fronting onto the southern street shall be provided with own-door access, with final layout and alignment of the street to be agreed with the Planning Authority in conjunction with (c) above.</p>	<p>In the interest of a high quality sustainable residential development, to protect the amenities of the area and adjoining sites, and to protect public health, and to uphold the objectives and policies of the Tallaght Town Centre Local Area Plan 2020 – 2026.</p>

	<p>(f) Commercial units to the west of the site should be presented as smaller units in design terms and should be functionally capable of being subdivided into smaller units for separate lease or sale.</p> <p>(g) The internal configuration of units to be altered agreed in order to provide that 30% of the residential units are 3-bedroom units.</p>	
3	<p>Special Financial Contribution</p> <p>The developer shall pay to the Planning Authority a financial contribution of €448,500.00 (four hundred and forty eight thousand, five hundred euro), in lieu of the minimum required public open space for the proposed development, in accordance with Section 2.7.2 of the Tallaght Town Centre Local Area Plan 2020 – 2026, and with the terms of the Development Contribution Scheme 2021 - 2025, made under Section 48 of the Planning and Development Acts 2000 (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>In accordance with the Tallaght Town Centre Local Area Plan 2020 and the proper planning and sustainable development of the area, it is considered reasonable that the payment of a contribution be required in lieu of public open space to contribute towards the provision of public open space, and/or to South Dublin County Council improvements to an existing park and/or enhancement</p>

		of amenities in the area.
4	<p>Roads Layout Details</p> <p>(a) Prior to commencement of development, the applicant or developer shall submit the written agreement of the National Transport Authority to the layout of Belgard Square East at its interface with the proposed development, to the Planning Authority. The agreement with the National Transport Authority shall include that the junction of Belgard Square North and Belgard Square East is signalised and that junction radii and materials adhere to DMURS guidance and reflect the street's prospective status as a mixed use secondary street, and the required facilitation of pedestrian comfort and safety arising.</p> <p>(b) Prior to commencement of development, the applicant, land owner or developer shall obtain the written agreement of the Planning Authority to a final layout for Belgard Road at its interface with the site. The agreed layout shall include a segregated cycle lane or as otherwise agreed, on the northward section of Belgard Road, between the junction with Belgard Square North and the junction with Blessington Road. The cycle lane shall conform to National Cycle Manual standards, and shall also be informed by the layout of the junction of Belgard Road and Blessington Road as per the Bus Connects project, and the NTA's Greater Dublin Cycle Network Plan.</p>	In the interests of local amenity and for the promotion of and transition to active travel modes.
5	<p>Irish Water Connection Agreement.</p> <p>(a) Prior to commencement of development the applicant or developer shall engage Irish Water to undertake a scoping exercise regarding the feasibility of the development, and submit the findings of that exercise, alongside any agreed program of works, to the Planning Authority.</p> <p>(b) Prior to the commencement of development the applicant or developer shall enter into water and/or wastewater connection agreement(s) with Irish Water.</p>	In the interest of public health and to ensure adequate water/wastewater facilities.
6	<p>Materials and Finishes and Building Lifecycle Report</p> <p>The applicant, land owner or developer shall obtain the written agreement of the Planning Authority to all external materials and finishes, in accordance with an agreed Building Lifecycle Report.</p>	In the interests of visual amenity and lifelong maintenance of the development.

Revised Landscape Plan

Prior to the commencement of Development, a revised landscaping strategy shall be agreed in writing with the Planning Authority. The revised landscape strategy shall include a revised landscaping layout, details of planting, hard surfacing materials, site levels, external lighting, a space-sharing strategy, external cycle parking, public seating and details of all gradients, ramps and steps within publicly accessible areas of the development. Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes and proposed numbers / densities and an implementation programme. The hard surfacing details shall include details of planters and samples showing the texture and colour of the materials to be used and information about their sourcing/manufacturer. The lighting details shall include detailed drawings of the proposed lighting columns and fittings, information about the levels of luminance and any measures for mitigating the effects of light pollution. The landscaping scheme shall also include details of defensible space in front of ground floor units, proposed finished site levels, boundary treatment and gates (including gates to the basement), vehicle and pedestrian access and circulation areas and structures (such as play equipment, furniture, refuse storage, signs and lighting). In addition, proposals shall include the following:

- 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
- Additional play opportunities for play should be provided with the proposed public opens space areas. Proposals shall be submitted in the form of a Proposed Play Rationale and Layout Plan (separate to but related to the Landscape Masterplan).
- Levels should be provided on all proposed landscape plans
- 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.
- A landscape Specification for all materials, workmanship and landscape maintenance (18 months minimum period post practical completion)
- A timescale for implementation of all proposals, including specified landscape operations; Landscape Contractors to include and 18 months Defects Liability Clause, after certified Completion by the Landscape Consultant
- Trees shall be a mixture of 18-20cm, 20-25cm and 30-35cm girth to create a mature setting for the development.
- Planting material where possible should be Irish Grown Nursey Stock and the importation of foreign planting material should be avoided within the proposed planting schemes.

To ensure that the development achieves a high standard of design, layout and amenity and makes provision for hard and soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive public realm in accordance with relevant policies in the CPD 2016-2022.

8	<p>Pedestrian Access to Public Spaces</p> <p>(a) Pedestrian access to the public open space area and the street 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.</p> <p>(b) 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>In the interest of social inclusion and to secure the integrity of the proposed development including open spaces</p>
9	<p>Appointment of Landscape Architect</p> <p>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. 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. If attenuation tree pits are proposed, their installation shall be supervised by the project landscape architect.</p>	<p>To ensure proper landscaping.</p>
10	<p>Children's Play</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. Additional provision/opportunities for play should be made within the proposed public open space areas within the Development. 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>

11	<p>SUDs</p> <p>A comprehensive SUDS Management 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, bio-retention tree pits, rain gardens, 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 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>
12	<p>Green Roofs</p> <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> <ol style="list-style-type: none"> i. SUDS, ii. the creation of appropriate and biodiversity <p>The details to be submitted shall comprise:</p> <ol 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>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</p>

13	<p>Rooftop Gardens</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> <p>(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.</p> <p>(ii) Hard and soft landscaping details.</p> <p>(iii) Details of measures to address noise levels and wind microclimate.</p> <p>(iv) Details of how inclusive access to and within communal rooftop gardens is achieved.</p> <p>(v) 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
15	<p>Landscape Management and Maintenance</p> <p>A Landscape Management and Maintenance Plan of both communal residential and publicly accessible areas shall be submitted to, and agreed in writing with, the planning authority prior to occupation of the development. This Landscape Management and Maintenance Plan shall cover a period of at least three years and shall include details of the arrangements for its implementation. Details of a to be implemented during operation of the development. All planting shall be adequately protected from damage until established and maintained thereafter. Any plants which die, are removed or become seriously damaged or diseased in the first 5 years of planting, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.</p>	To provide for the satisfactory future maintenance of this development in the interest of visual amenity.
16	<p>Mobility Management Plan</p> <p>A Mobility Management Plan is to be completed within six months of opening of the proposed development. The Mobility Management Plan shall be agreed with the Planning Authority 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>	To promote sustainable travel and to ensure the development is sustainable.
17	<p>Roads</p> <p>(a) The applicant shall obtain the written agreement of The Planning Authority (Cycle South Dublin section) to any cycle infrastructure delivered as part of the development.</p> <p>(b) The applicant shall provide segregated cycle infrastructure to link with any existing or proposed along all frontages of the proposed development or as otherwise agreed.</p> <p>(c) Refuse collection from this development shall not be from the public realm. All refuse collection shall occur within the curtilage of the development.</p> <p>(d) The undercroft parking spaces if not conforming to SDCC recommendation of 2.5m width shall conform to DMURS of 2.4m wide. The applicant shall agree a final layout for the undercroft car park with South Dublin County Council prior to commencement of development.</p>	To ensure the safe and proper functioning of the scheme.

18	<p>Car Park Facilities for Charging Electric Vehicles.</p> <p>(a) A minimum of 10% of the ancillary car parking spaces shall be provided with facilities for charging electric vehicles.</p> <p>(b) 100% of the spaces shall be designed and delivered with the capability to have facilities for charging electric vehicles installed at a later time.</p> <p>The applicant shall agree the final layout and specification of ECV facilities 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>
19	<p>Public Lighting Scheme</p> <p>Prior to the commencement of development, the applicant shall agree in writing a public lighting scheme with South Dublin County Council Lighting Department. Once agreed, the scheme shall be constructed/installed to taking in charge standards at the expense of the developer and to the satisfaction of South Dublin County Council Lighting Department.</p>	<p>To ensure scheme is safely and adequately lit.</p>
20	<p>Taking in Charge</p> <p>(a) Prior to commencement of development, the applicant shall submit a revised Taking in Charge Plan showing those areas in public ownership to not be under the control of a management company, and to agree with the Planning Authority the final layout and specifications for all items to be taken in charge. All items and areas for taking in charge shall be undertaken to a taking in charge standard. The applicant should note that SDCC does not prefer not to take in charge areas which are under private balconies.</p> <p>(b) 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. Updated SDCC Taking in Charge standards are available for download at the following link: https://www.sdcc.ie/en/services/planning/commencement-and-completion/completion/taking-in-charge-policy-standards/</p>	<p>To ensure the scheme can be taken in charge.</p>
21	<p>Drainage – Surface Water</p> <p>The disposal of surface water, shall fully comply with all of the technical requirements of the Council’s Water Services Section. In this regard, prior to the commencement of development, the applicant/developer shall agree the surface water services details with the Planning Authority.</p> <p>There shall be complete separation of the foul and surface water drainage systems, both in respect of installation and use.</p> <p>All new precast surface water manholes shall have a minimum thickness surround of 150mm Concrete Class B.</p> <p>All drainage works for this development shall comply fully with the Greater Dublin Regional Code of Practice for Drainage Works.</p>	<p>In the interest of public health, safety, the proper planning and sustainable development of the area and in order to ensure adequate sustainable drainage provision.</p>

22	<p>Under-ground Public Services 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. There shall also be provision for broadband throughout the site in accordance with the Planning Authority's policy and requirements.</p> <p>The overhead electrical cables at the southern boundary, on Colbert's Fort, shall be undergrounded.</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>
23	<p>Occupancy and Services No dwelling unit shall be occupied until all the services (drainage, water supply, electricity and or other energy supply, public lighting and roads) for each dwelling unit have been completed thereto and are operational.</p>	<p>In the interest of the proper planning and sustainable development of the area.</p>
24	<p>Street Naming and Dwelling Numbering. 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 Authority:</p> <p>(i) A street naming and dwelling/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 number shall be placed on each house upon completion so as to be clearly legible from the proposed access road or the public realm, and 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: Avoid any duplication within the county of existing names, and reflect the local and historical context of the approved development, and comply with; Development Plan policy, and The guidelines on naming and numbering of the Department of Environment, Heritage and Local Government, and Have regard to the Guidelines issued by the Place Names Commission (An Coimisiún Logainmneacha) and Preferably make exclusive use of the Irish language.</p> <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.</p> <p>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>In the interest of the proper planning and sustainable development of the area and compliance with the South Dublin County Council's Development Plan.</p>

25	<p>Aviation Safety</p> <p>(a) 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, owner or developer shall lodge with the Planning Authority evidence of the written agreement from the Irish Aviation Authority to the crane operations proposed on site including a marking and lighting scheme for construction cranes and as such information as may be required by the Irish Aviation Authority including crane type, elevation, dimensions, ground elevation and location co-ordinates. The operation of cranes shall be co-ordinated with the Air Corps Air Traffic Services, no later than 30 days before use.</p> <p>(b) Prior to commencement of development, the applicant land owner or developer shall obtain the written agreement of the Irish Aviation Authority to appropriate aeronautical obstacle warning lighting.</p>	In the interests of public safety.
26	<p>Aviation</p> <p>Provide at least 30 days notification of proposed crane operations to the Property management branch of the Department of Defence and the Health Service Executive.</p>	To ensure aviation safety and that the construction does not interrupt operations at airfields or helipads in the vicinity.
27	<p>Part V Social Housing</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; 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</p> <p>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.
28	<p>Minimise air blown dust</p> <p>During the construction 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>	In the interest of public health and to uphold the Council's policies set out in the South Dublin County Council Development Plan.

Construction Noise

To control, limit and prevent the generation of unacceptable levels of Environmental Noise Pollution from occurring, no Equipment or Machinery (to include pneumatic drills, on-site construction 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.

Any 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). 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 shall be provided with the following:

- 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.

In the interest of public health by the prevention of unacceptable levels 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.

30	<p>Public Realm debris avoidance</p> <p>Prior to the lodgement of a 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, owner or developer or any other person with an interest in the land to which the development as approved relates shall lodge with the Planning Authority an agreed site specific plan making provision as set out below for the prevention of spillage or deposit of clay, rubble or other debris on adjoining public roads during the course of any construction works that fully complies with all of the requirements of the Council’s Roads Maintenance, Traffic Management, and Waste Enforcement Sections as appropriate, along with written confirmation of the agreement of the Council’s Roads Maintenance, Traffic Management, and Waste Enforcement Sections to the plan. The agreed plan shall provide for all of the following;</p> <p>The agreed number, location, type and use of suitable facilities for vehicle cleansing and wheel washing provided on site to contain all clay, rubble or other debris within the site prior to commencing of construction and a written commitment that such facilities will be maintained in a satisfactorily operational condition during all periods of construction.</p> <p>Location of all on-site car parking facilities provided for site workers during the course of all construction activity.</p> <p>Provision for dust suppression measures in periods of extended dry weather</p> <p>Provision for the flexible use of a road sweeper if an acute situation on the adjoining public road requires it.</p> <p>Containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained. Such bunds shall be roofed to exclude rainwater;</p> <p>Storage of construction materials is not permitted on any public road or footpath, unless agreed in writing with the Planning Authority, having regard to the prior reasonable justification and circumstances of any such storage.</p>	<p>In the interest of protecting the amenities of the area and in the interest of public safety and the sustainable maintenance of adjoining roads and footpaths.</p>
31	<p>Construction & Demolition Waste Management Plan.</p> <p>Prior to commencement of development, the applicant shall submit a developed Construction Demolition and Waste Management Plan for the written agreement of the Planning Authority, which shall meet the requirements of the Planning Authority’s Roads Department and Waste Management Section.</p>	<p>In the interests of public safety, compliance with Development Plan Policy and sustainable waste management.</p>

32	<p>Financial Contribution.</p> <p>The developer shall pay a financial contribution 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 of the authority, in accordance with the terms of the Development Contribution Scheme 2020, made under Section 48 of the Planning and Development Acts 2000-2022 (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.</p> <p>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>The provision of such facilities will facilitate the proposed development. It is 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>
33	<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 no 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 MINUTES

SOUTH DUBLIN COUNTY COUNCIL PLANNING DEPARTMENT PRE-APPLICATION CONSULTATION REPORT FORM		
Pre Planning Ref. No. SHD1SPP015/20	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: 8/1/2021		
Full address of subject site	ABB Limited, Belgard Road, Belgard Square North and Belgard Square East, Tallaght, Dublin 24	
Name/s of Applicant/s and/or Agents Contact Details	Applicant: Landmarque Belgard Development Company Ltd.	
	Agent: John Spain Associates	
SDCC Staff participating	Jim Johnston, Colm Maguire (Planning); John Hegarty (Roads); Laurence Colleran (Public Realm); Brian Harkin (Water Services).	

DESCRIPTION OF PROPOSAL
Proposed Development comprising c. 380 residential units (mix of build-to-sell and build-to-rent), associated works including demolition of the existing ABB facility, new public realm works, landscaping and site infrastructure works.

Relevant Planning History
None on subject lands. Nearby Sites: Various SHD developments have been applied for in the Tallaght and Cookstown Area. A permission for 438 units has been permitted to the north (SHD3ABP-303306-18).

ZONING: 'TC' – *'To protect, improve and provide for the future development of Town Centres'*

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

FEEDBACK/OBSERVATIONS OF PROPOSAL

Comment where relevant:	<u>Applicant's Presentation</u>
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- Applicant wants to build and hold the site. Wants to hold onto long-term tenants and focus on community.
- Transport accessible.
- Undercroft car park. Electric charging spaces for cars and bikes.
- From site location and transport (bus stops and luas):
 - o New urban grain. Connectivity to site to the north.
 - o Sun penetration maximised.
 - o Strong urban edges.

Landscape:

- o Three fingers with podium below. We are creating these two pocket spaces, which connect with the pocket spaces elsewhere.
 - o We're really happy with the local tertiary route. Is it a homezone / community space?
 - o We want commercial along Belgard Square at a 'community scale'.
 - o We want housing frontage and activity in the tertiary route.
- 1.
- Site is at a key gateway / junction between town centre and TUD
 - Site can provide build-in enclosure to the open space to the east.
 - Along the road to the east, there are higher buildings.
 - We believe this site warrants a landmark – a marker of the gateway.
 - Very important to note that our client will build out the scheme.

Planning

- We will set out the justification for the height/landmark based on national policy.
- Plot ratio is a reference point rather than a key driver. We acknowledge that but will address it.
- We're not reliant on the southern site in any way.
- We will pick up on the policies you set out.
- On mix, we will refer back to national policy on that.
- HeatNet is very relevant, we will refer to that.

SDCC Feedback

Planning

- Note the recent adoption of the LAP at this site.
 - Note that proposed uses are permissible.
 - Sought clarification on tenure mix.
 - o 60:40 in favour of build-to-sell
- 2.
- LAP Policies
- LAP does not designate this as a landmark site, so height would exceed the Plan.
 - Plot ratio of 3.6 would also exceed the plan.
 - North and East boundary of 6-7 storeys, south and west are 3-5 storeys with fine urban grain.

- Nothing in the plan (that I can see) to indicate the site is a landmark building.
- So site would breach height, plot ratio, and would feature a landmark not provided for. (9-15 storeys).
- Southern boundary is a homezone – I couldn't find a linear park.
 - o Applicant: Yes, Linear Park is an inappropriate description. It is a homezone.
- On that southern route, we need to assume that the site to the south isn't being developed as we don't know the intentions of that site.
- Separation Distances between the blocks on the site:
 - o Applicant: 22 metres.
- PGE 41 of LAP: A mixed-use urban centre. A vibrant mixed-use residential community. So show exactly what is proposed? We would look for a greater mix given that this is the town centre. We need to see the frontages, footpath areas, what are they comprising.
- It would be useful to have the layout of the Market development included in plans / images.
- Page 42: Town Centre objectives:
 - o TC1, TC3, TC6, TC7, TC11.
 - o We will be looking to see these objectives fulfilled.
 - o 3-Bed minimum of 30%. Falling far short of that with 3% mix.
 - o Consider the HeatNet project from the Amazon data centre. Some future-proofing should take place.
- Scheme should tie in with signalised junctions.

Roads

- Second entrance may be required.
- Be cognisant of bus connects layouts. Tie in properly.
- We would expect a lower car parking provision. There are examples in the neighbouring area of 0.3.
- Parking ratio depends on a couple of factors – if 3-bed ratio is increased, parking ratio would need to be increased.
- Normally we would also like to see a higher parking ratio in build to sell units.
- I would've thought therefore that ratio would be higher than 0.3 in this case – 0.35 to 0.45 perhaps.
- In your justification, you can reduce parking if you have a car sharing agreement.
- 30% electric charging points is good. We also require that remainder of spaces are ducted / provide for future charging.
- We are happy with generous bicycle parking provision.
- Bin management and fire tender access: needs to be detailed in application.
- We require CDWMP and CMP. Haul routes and volume of materials to be shifted.
- 1,000^{m2} of commercial – where/what is the parking provision going to be for that?
- Traffic and Transport Analysis will be very important.

-
- Junction analysis of neighbouring junctions.
 - Take account of the other permitted planning applications in the area.

Parks

- We don't have any major issues with the concept as proposed.
- We would be interested in seeing a lot of SUDs on-site. Green roofs and anything to protect and enhance biodiversity in the area.

Water Drainage

- We also seek SUDs. First try and attenuate surface water through SUDs.
 - If that's not sufficient, use attenuation systems. We have a table available to you, on that you should show the area of each surface type and the runoff coefficient of those surface areas.
 - Outline Flood Risk zone in the area. If it is, outline what type of flood zone and what the mitigation measures would be.
 - Sufficient distance from existing services required. If you are diverting services, you will need to reach agreement with Irish Water. You will also need connection agreement in general for the agreement.
-

Colm Maguire
Assistant Planner

APPENDIX 3: HOUSING REPORT

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM **HOUSING DEPARTMENT**

4 July 2022

Michael Mulhern
Director of Land Use, Planning and Transportation
Dept. of Development, Economic & Transport Planning

FAO: Colm Maguire

Re: Reg Ref: SHD3ABP-313606-22

Location: The Former ABB Site, Belgard Road, Tallaght, Dublin 24

Applicant: Landmarque Belgard Development Company Limited

Proposal: The construction of a mixed-use residential development set out in 3 blocks including a podium over a basement, ranging in height from 2 to 13 storeys (with core access above to roof terrace), comprising 334 residential units of which 118 will be Build to Rent (BTR) residential units, with associated amenities and facilities across the development; 4 retail/café/restaurant units and 3 commercial spaces associated with the 3 live-work units

I refer to the above application for planning permission, SHD3ABP-313606-22 for the development of 334 residential units 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, the applicant proposes to fulfil the Part V obligation by providing, 33 units by way of an enhanced lease. The apartment units proposed comprise of 20 x 1 bed, 11 x 2 Bed and 2 x 3 Bed. It is South Dublin County Councils preference to **acquire units on site** and as such the proposal is not acceptable to the Housing Department. Negotiations on a revised proposal will commence following any grant of planning permission.

The Part V percentage liability is dependent on the date the applicant purchased the subject site and the supporting documentation lodged with the Part V Stage 3 application is noted.

It is requested that approximately 7% of the Part V units are suitable for persons with medical needs.

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,

Edel Dempsey
Senior Staff Officer
Housing Procurement Section

APPENDIX 4: PUBLIC REALM REPORT

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

Public Realm Planning Report

Development: On a site bound by Belgard Road (R113) to the east, Belgard Square North to the North, Belgard Square East to the west and Clarity House to the south, demolition of all existing structures on site (with a combined gross floor area of c. 3625sq.m); The construction of a mixed-use residential development set out in 3 blocks including a podium over a basement, ranging in height from 2 to 13 storeys (with core access above to roof terrace), comprising 334 residential units of which 118 will be Build to Rent (BTR) residential units, with associated amenities and facilities across the development; 4 retail/café/restaurant units and 3 commercial spaces associated with the 3 live-work units (723sq.m combined); Childcare facility (144sq.m); 670 bicycle parking spaces including 186 visitor spaces; 117 car parking spaces (including 6 disabled spaces) are provided at ground floor and basement level; Communal space in the form of residential courtyards and roof terraces; Public open space provision including Homezone/tertiary route along the south of the site between Belgard Rd and Belgard Square East; The overall development has a Gross Floor Area of 29,784sq.m; Of the total 334 residential units proposed, unit types comprise Block A (Build-to-Rent), 91 one bed units; 1 two bed 3 person units; 26 two bed 4 person units; Blocks B & C, 2 live-work studio units; 102 one bed units; 12 two bed 3 person units; 88 two bed 4 person units including 5 duplex units; 1 two bed 4 person live-work unit; 11 three bed units; A portion of the proposed residential

development is a 'Build to Rent' scheme in accordance with Specific Planning Policy 7 and 8 as set out in the 'Sustainable Urban Housing: Design Standards for New Apartments (December 2020); All associated works, plant, services, utilities, telecommunications infrastructure, PV panels and site hoarding during construction; A Natura Impact Statement has been prepared in respect of the proposed development and accompanies this application; The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant development plan or local area 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: The Former ABB Site, Belgard Road, Tallaght, Dublin 24
Applicant: Landmarque Belgard Development Company Limited
Reg. Ref: SHD3ABP-313606-22
Report Date: 01/07/2022
Planning Officer: Colm Maguire

Main Concerns:

- The applicant states that they are providing 1,489 sqm (17%); this is in excess of the 10% required under the LAP however the Public Realm Section would have concerns regarding the quality, functionality and amenity value of the public open space provided within the proposed Development.
- The Planning Authority has serious concerns regarding the public open space provision within the proposed development. Notwithstanding that communal open space is provided at podium level, the ground level public open space would be compromised by way of its scale, siting, and treatment, and in terms of its amenity value, functionality, and provision of play areas. The public open space should be consolidated and relocated into one large Public Open Space within the site as opposed to the fragmented nature of the proposed micro pocket parks and "Home Zone" Street.
- Potential effect on amenity due to overshadowing and wind tunneling effect created by the tall buildings (2-13 storeys)

- The public open space provided is peripheral to the overall development as it is predominantly located along the boundaries of the development, lacks sufficient animation and is dominated by hard surfacing and contains a lack of amenity, functionality and play facilities within the open space proposals.
- Additional information/detail required on proposed play items contained within the landscape proposals. There seems to be insufficient play items proposed within the public open space areas.
- Additional natural SUDS features should be incorporated into the proposed drainage system for the development such as bio-retention tree pits and rain gardens etc.

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:

Under the South Dublin County Development Plan 2016-2022, the subject site is zoned Objective TC “To protect, improve and provide for the future development of Town Centres”.

Density:

372 unit / ha

Total Site Area:

c. 0.898 Hectares

Proposed Public Open Space Provision as stated in Planning Report

c.1,489 sqm (17%)

Communal Open Space Provision as stated in Planning Report

c.2,146 sqm

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 part of the Tallaght Town Centre Development area. Within the Development area, the application lands are located within the Centre neighbourhood area.

As per Section 3.2 The Centre; the Key Objectives for the Centre Neighbourhood include:

- TC1: Continue the transformation of the centre with an increase in existing residential, commercial, retail, civic, services and cultural uses and functions.
- TC2: Support the continued function and future expansion of services of Tallaght Hospital and facilitate improved access to the hospital

- TC3: Improve urban legibility throughout the area by providing new local streets including an extension to Airton Road to Cookstown Road; and Cookstown Road to Belgard North; and a new connection from Belgard North to Tallaght Square
- TC4: Improve the condition of existing streets to encourage walking and cycling
- TC5: Facilitate and support the delivery of a transport interchange integrating Luas, bus, cycle & taxi on land in and around Tallaght Square.
- TC6: Facilitate economic development, employment generation and provide an Innovation Centre which supports small business and accommodates growth and future success of local businesses.
- TC7: Improve interface with all existing and proposed routes and open spaces.
- TC8: Encourage new development on existing areas of surface car parking and support in principle the relocation of existing surface parking and roof parking spaces associated with The Square in new multi-storey and/or underground car parks, subject to high quality urban design and integration with the objectives of permeability and mixed-uses in the Centre neighbourhood.
- TC9: Provide new primary and secondary open spaces. Including provision of a new urban square or plaza to the north of Belgard Square North.
- TC10: Improve and enhance the public realm.
- TC11: Improve connectivity to all surrounding areas.
- TC12: Promote the provision of a post primary school to serve the Tallaght catchment.
- TC13: Promote provision of primary school to serve the area.
- TC14: Provide cycle and pedestrian routes which facilitate ease of access across the N81 between the Town Centre and Sean Walsh Park, surrounding residential areas, The Stadium and ultimately the Dublin Mountains. Alternative options to be assessed, including the provision of a landbridge, subject to a detailed traffic study and subject to agreement of Transport Infrastructure Ireland, National Transport Authority and landowners, where relevant.
- TC15: Explore the feasibility of uplifting the River Poddle and incorporating into public realm, open space and green/blue infrastructure asset strategies as part of proposals for 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 provision (1,489 sqm) is primarily being provided in the form of an east west pedestrian and cycle connection (homezone) and small park along the southern boundary of the site connecting TUD Tallaght Campus to the east with the Tallaght Town Centre to the west; and two plaza areas set back from the street along the northern boundary of the site.

The Public Realm is concerned that the public open space provision within the development is primarily provided through linear space along the perimeter of the development and through the provision of 3 no. Micro-pocket parks. The Public Realm Section welcomes the addition of a pocket park to the south along with the proposed mini-plaza. However, that Public Realm Section would have concerns that the Public Open Space provision outside of the proposed pocket parks and “Homezone Street” south is dominated by hard landscaping; this is not acceptable to the Public Realm Section as it does not constitute meaningful public open space provision in terms of quantity, usability and quality of the proposed public amenity space and is not sufficient to meet the Planning Authorities requirements. Proposed Public open spaces areas throughout the development should be designed to be usable and functional within the overall proposed development.

Public Open Space provided within a residential development could contribute towards the County’s green network, provide a local park, provide play space or playgrounds, create new civic space/plaza, or improve the amenity of a streetscape. Green spaces can also help with surface water management through integration with sustainable urban drainage systems. Public open space is open space which makes a contribution to the public domain and is accessible to the public for the purposes of active and passive recreation, including relaxation and children’s play. Public open space also provides for visual breaks between and within residential areas and facilitates biodiversity and the maintenance of wildlife habitats. All public open spaces shall be of a high quality in terms of design and layout, be located in such a manner as to ensure informal supervision by residents and be visually and functionally accessible to the maximum number of residents.

The two proposed micro- pocket parks to the north are not considered to fulfil the role and description of pocket parks, due to their size, siting and surrounding context. The immediate context of these parks is relatively blank facades to the podium (with bike storage at ground level), and commercial units / residential lobbies. The LAP includes the option of a financial contribution in lieu of public open space in circumstances that the site is inappropriate for public provision. It is the opinion of the

Planning Authority that the proposed public open space areas (3 no. micro pockets parks) should be consolidated into one larger public open space area which would provide a connection between Belgard Square North and the “Home Zone” Street to the south and would be more agreeable to the Public Realm Section in terms of meeting the required level of public amenity, functionality and usability.

2. Communal open space

Communal open spaces within the proposed development are delivered through a combination of podium and roof level spaces that consist of informal gathering spaces, landscaped podium gardens and pocket parks. Communal Open space provided within the proposed development equates to **0.2144 ha**. 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

2. 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

Housing and mixed used developments are required to improve the public realm, provide ample private/semi-private and public open space, incorporate space for nature and must not result in detrimental microclimatic effects or overshadowing of proposed open space and amenity areas within the development. The applicant shall incorporate these requirements into the design and layout of the proposed public open spaces areas within the development. Revised landscape plans/layout should be provided in this regard.

3. 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 landscape proposals should include features designed to reduce flood risk, which are built to receive surface water run-off, such as constructed tree pits, permeable surfaces, retention ponds, green roofs and swales.

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

Considering the size of the proposed development (334 residential units ranging in height from 2 to 13 storeys) There are insufficient SUDS features contained with the drainage proposals for the proposed development. The only SuDS features proposed for the development include:

- Permeable Paving to all new parking spaces
- attenuation tank with flow control device
- green roofs

This is not acceptable to the Public Realm Section and contravenes **G5 Objective 1 of the SDCC CDP 2016-2022**. Additional natural SUDS features should be incorporated into the proposed drainage system for the development such as natural swales, bio retention areas, rain gardens, detention basins, filter drains, , integrated tree pits, etc.

There are concerns with how surface water is to be managed within the subject site and the applicant is requested to provide a response to the following matters:

- It is unclear how much attenuation in total is provided for the development. Submit a report and drawing showing how much surface water attenuation in m3 is provided for the development. Also submit a drawing showing where the surface water attenuation will be provided for the development.
- Include additional SuDS (Sustainable Drainage System Features) and submit details of same.

4. Landscape 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.

5. Play

There seems to be insufficient play items proposed with the public open space areas considering the size of the proposed development. There are three play areas located at first floor level within the communal courtyard (110 sqm, 60 sqm & 130sqm) compared to only one play space being provided with the proposed pocket park to the south (200sqm). The landscape proposals locate the majority of the play areas within the communal space areas (300sqm total vs 200sqm total) this is not acceptable to the Public Realm Section. There should be a more balanced/even distribution of proposed play locations between communal and public open space areas.

Additional details, specifications and images need to be provided in relation to the proposed playgrounds and play spaces for 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 is requested to submit a revised play strategy which locates a larger portion of the proposed play areas within the Public Open Space areas.

6. Contribution in Lieu of Public Open Space – Tallaght Local Area Plan Lands

The Tallaght Local Area Plan provides for a minimum of 10% of the gross site area to 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. Where public open space requirements cannot be met on site in full, or partially, because the site is considered by the planning authority to be too small or inappropriate (because of site shape, context or general layout) to fulfil a useful open space/amenity purpose, the Tallaght Local Area Plan provides discretion to the Council to determine a financial contribution in lieu of all, or part of, the public open space requirement for a particular development. This contribution in lieu shall be levied at the rate of €7,500,000 per hectare of open space required, or on a pro rata basis of the public open space not provided on site. This contribution in lieu will be used towards the provision of public open space, and/or to South Dublin County Council improvements to an existing park and/or enhancement of amenities in the area unless as otherwise agreed with the planning authority.

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:

1. Revised Landscape Design Proposals

Prior to the commencement of Development, a revised landscaping strategy, which meets the requirements of the Public Realm Section in terms of meaningful public open space provision as required under the CDP 2016-2022 and effectively contributes to the accessibility and permeability of the site has first been submitted and agreed in writing with the Planning Authority. The revised landscape strategy shall include a revised landscaping layout, details of planting, hard surfacing materials, site levels, external lighting, a space-sharing strategy, external cycle parking, public seating and details of all gradients, ramps and steps within publicly accessible areas of the development. Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes and proposed numbers / densities and an implementation programme. The hard surfacing details shall include details of planters and samples showing the texture and colour of the materials to be used and information about their sourcing/manufacturer. The lighting details shall include detailed drawings of the proposed lighting columns and fittings, information about the levels of luminance and any measures for mitigating the effects of light pollution. The landscaping scheme shall also include details of defensible space in front of ground floor units, proposed finished site levels, boundary treatment and gates (including gates to the basement), vehicle and pedestrian access and circulation areas and structures (such as play equipment, furniture, refuse storage, signs and lighting). In addition, proposals shall include the following:

- The proposed public open space areas (3 no. micro pockets parks) should be consolidated into one larger public open space area which would provide a connection between Belgard Square North and the “Home Zone” Street to the south and would be more agreeable to the Public Realm Section in terms of meeting the required level of public amenity, functionality and usability.
- 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
- Additional play opportunities for play should be provided with the proposed public opens space areas. Proposals shall be submitted in the form of a Proposed Play Rationale and Layout Plan (separate to but related to the Landscape Masterplan).
- Levels should be provided on all proposed landscape plans

- 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.
- A landscape Specification for all materials, workmanship and landscape maintenance (18 months minimum period post practical completion)
- A timescale for implementation of all proposals, including specified landscape operations; Landscape Contractors to include and 18 months Defects Liability Clause, after certified Completion by the Landscape Consultant
- Trees shall be a mixture of 18-20cm, 20-25cm and 30-35cm girth to create a mature setting for the development.
- Planting material where possible should be Irish Grown Nursey Stock and the importation of foreign planting material should be avoided within the proposed planting schemes.

REASON: To ensure that the development achieves a high standard of design, layout and amenity and makes provision for hard and soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive public realm in accordance with relevant policies in the CPD 2016-2022.

2. Public Open Space Design/Layout

Public open spaces shall be designed to be usable and functional within the overall proposed development. The proposed public open space areas within the subject site area shall be increased in size with better connectivity and functionality and softened through the addition of native pollinator friendly planting. Revised proposals to be provided by the applicant in this regard. Response should include revised layout and drawings.

REASON: 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

3. Pedestrian Access

- (a) 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.

(b) 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

4. 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. Additional provision/opportunities for play should be made within the proposed public open space areas within the Development. 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.

5. SUDS

A comprehensive SUDS Management 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, bio-retention tree pits, rain gardens, 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 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. Taking in Charge

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

REASON: To ensure that designs, materials and specifications shall meet with the requirements of the Local Authority and the Development Agency and in the interests of proper planning and sustainable development.

7. 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

8. Rooftop gardens

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

9. Biodiversity Enhancement

Prior to the commencement of Development detailed proposals for biodiversity enhancement across the site to be submitted and agreed with the Local Planning Authority.

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

10. Landscape Management and Maintenance

A Landscape Management and Maintenance Plan of both communal residential and publicly accessible areas shall be submitted to, and agreed in writing with, the planning authority prior to occupation of the development. This Landscape Management and Maintenance Plan shall cover a period of at least three years and shall include details of the arrangements for its implementation.

Details of a to be implemented during operation of the development. All planting shall be adequately protected from damage until established and maintained thereafter. Any plants which die, are removed or become seriously damaged or diseased in the first 5 years of planting, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.

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

Prepared By: Oisin Egan

Executive Parks Superintendent

Endorsed By: Laurence Colleran

Senior Executive Parks Superintendent

APPENDIX 5: WATER SERVICES REPORT

Register Reference No.: SHD3ABP-313606-22

Development: Demolition of all existing structures on site (with a combined gross floor area of c.2,434sqm); construction of a mixed use residential development set out in 3 blocks above a podium, ranging in height from 9 to 15 storeys, comprising of 380 residential units of which 150 will be Build to Rent (BTR) residential units, with associated amenities and facilities across the development, 4 commercial units and 4 commercial units associated with the 4 live-work units (553sq.m. combined), Childcare facility (144sq.m.), 742 bicycle parking spaces including 190 visitor spaces; 96 car parking spaces (including 5 disabled spaces) are provided at podium/ground floor level; the overall development has a Gross Floor Area of 32,582sq.m; Of the total 380 residential units proposed, unit types comprise of Block A (Build-to-Rent) 1 live-work studio unit, 110 one bed units, 1 two bed 3 person units, 38 two bed 4 person units including 2 duplex units Blocks B & C; 2 live-work studio units, 109 one bed units, 12 two bed 3 person units, 93 two bed 4 person units including 3 duplex units, 1 two bed 4 person live-work unit, 13 three bed units; all associated works, plant, services, utilities, PV panels and site hoarding during construction.

Location: The Former ABB Site, Belgard Road, Tallaght, Dublin 24
Report Date : 23rd June 2022

Surface Water Report:

Comments and Clarification of Further Information Required:

1.1 The applicant shall submit a revised report and drawing to show what surface water attenuation capacity in m³ will be provided by the proposed SuDS (Sustainable Drainage Systems). Show in a drawing where surface water will be attenuated by means of SuDS.

SuDS shall be incorporated as much as possible to attenuate/convey surface water runoff. (Water Quality, and use rainwater for Amenity and Bio Diversity). Examples of SuDS include:

- Green/Blue roofs
- Swales
- Filter Drains/Channel rills
- Infiltration systems
- Rain Gardens
- Permeable Paving
- Tree pits
- Arch type systems where SuDS are insufficient

- 1.2 A concrete tank is not recommended to use for surface water attenuation because it is not a SuDS type system. Surface water shall be attenuated by means of SuDS. Where this is not sufficient an arched type attenuation system shall be used instead of SuDS.
- 1.3 Submit a report to show percolation test results for proposed development. Carry out soil infiltration tests on site to determine if infiltration SuDS systems are feasible and submit with application.

Flood Risk Report:

No Objection:

Note:

- 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.
-

		23 rd June 2022
Signed:	_____	Date: _____
	Adam Adderley-McCabe GE	
Endorsed:	_____	23 rd June 2022
	Brian Harkin SEE	Date: _____

APPENDIX 6: ROADS DEPARTMENT REPORT

An application for Strategic Housing Development was received by An Bord Pleanála on the 18/05/2022.

Site: The Former ABB Site, Belgard Road, Tallaght, Dublin 24

Applicant: Landmarque Belgard Development Company Limited

Development: On a site bound by Belgard Road (R113) to the east, Belgard Square North to the North, Belgard Square East to the west and Clarity House to the south, demolition of all existing structures on site (with a combined gross floor area of c. 3625sq.m); The construction of a mixed-use residential development set out in 3 blocks including a podium over a basement, ranging in height from 2 to 13 storeys (with core access above to roof terrace), comprising 334 residential units of which 118 will be Build to Rent (BTR) residential units, with associated amenities and facilities across the development; 4 retail/café/restaurant units and 3 commercial spaces associated with the 3 live-work units (723sq.m combined); Childcare facility (144sq.m); 670 bicycle parking spaces including 186 visitor spaces; 117 car parking spaces (including 6 disabled spaces) are provided at ground floor and basement level; Communal space in the form of residential courtyards and roof terraces; Public open space provision including Homezone/tertiary route along the south of the site between Belgard Rd and Belgard Square East; The overall development has a Gross Floor Area of 29,784sq.m; Of the total 334 residential units proposed, unit types comprise Block A (Build-to-Rent), 91 one bed units; 1 two bed 3 person units; 26 two bed 4 person units; Blocks B & C, 2 live-work studio units; 102 one bed units; 12 two bed 3 person units; 88 two bed 4 person units including 5 duplex units; 1 two bed 4 person live-work unit; 11 three bed units; A portion of the proposed residential development is a 'Build to Rent' scheme in accordance with Specific Planning Policy 7 and 8 as set out in the 'Sustainable Urban Housing: Design Standards for New Apartments (December 2020); All associated works, plant, services, utilities, telecommunications infrastructure, PV panels and site hoarding during construction; A Natura Impact Statement has been prepared in respect of the proposed development and accompanies this application; The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant development plan or local area 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.

This is Stage 3 of the SHD process, Application to An Bord Pleanála.

The applicant set up a dedicated website <https://abb-belgardrdredevelopment.ie/> which the application details have been uploaded.

Stage 3 reference number: SHD3ABP-313606-22

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 boards opinion required the following roads items to be addressed.

12. A Traffic and Transportation Impact Assessment.

3.43. A Traffic Transportation Impact Assessment has been prepared by CS Consulting Group and is enclosed with this application. The main items from the TTA are:

BusConnects Core Bus Corridors

Under the BusConnects Core Bus Corridor (CBC) project, it is proposed to implement Core Bus Corridor no. 9. BusConnects proposals do not require any land take from the development site but do entail the provision of:

- an off-road cycle track along either side of Belgard Square East; and
- a bus stop on either side of Belgard Square East, immediately to the north of the proposed development access location.

Greater Dublin Area Cycle Network Plan

The applicant has stated the no information is yet publicly available on the proposed design or delivery timeframe of these objectives. But it is possible to contact the Dublin Cycle South office directly and coordinate any future proposals for cycle infrastructure in the area.

Car parking

Table 18 – Car Parking Provision – by County Development Plan

Land Use Type	Maximum Rate (Zone 2) ^s	Quantum	Max. Parking Provision	Proposed Provision
1-bed Apartment	0.75 spaces per unit	195 units	146 spaces	117 spaces
2-bed Apartment	1 space per unit	128 units	128 spaces	
3-bed Apartment	1.25 spaces per unit	11 units	14 spaces	
Convenience Retail	1 space per 25m ² GFA	723m ² GFA	29 spaces	0 spaces
Crèche	0.5 spaces per classroom	4 classrooms	2 spaces	0 spaces
Total			319 spaces	117 spaces

Figure 1 car parking from applicants report

The development shall include a total of 117no. car parking spaces, all of which shall be allocated to residential use. 78no. spaces shall be provided at undercroft (ground floor) level and 39no. spaces shall be provided at basement level. The development's proposed car parking provision equates to an average rate of 0.35 spaces per residential unit.

Parking spaces shall not be assigned to individual apartment units; spaces shall instead be allocated and/or leased to residents and staff based on availability and need, in part by means of a permit/lottery system, in order to optimise the use of parking spaces.

5% of 117no. spaces equate to 6 no. disabled-accessible car parking spaces are provided at undercroft level within the proposed development.

10% of 117no. spaces for EV charging is 12no. the applicant is proposing 24no.

Bicycle Parking Provision

The development shall include a total of 670no. bicycle parking spaces. These comprise:

Bicycle Parking Provision – by County Development Plan is 119 no. spaces.

Residential Bicycle Parking Provision – by Apartment Guidelines is 651 no. spaces.

Table 21 illustrates the application of these Apartment Guidelines recommendations to the proposed development.

Table 21 – Residential Bicycle Parking Provision – by Apartment Guidelines			
Recommended Rates	Quantum	Recommended Provision	Proposed Provision
Long-Term Cycle Parking			
1 space per bedroom	484 bedrooms	484 spaces	484 spaces
Short Stay Cycle Parking			
1 space per 2 apartments	334 apartments	167 spaces	167 spaces
Development Totals			
Total		651 spaces	651 spaces

Figure 2 Bicycle parking provision from report

The applicant was requested to provide cycle facilities along the frontage of its development. They have replied that no upgrades along Belgard Road will be completed as part of this development.

8.2.22 SDCC Roads Dept Recommendation 22

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

Response to Recommendation 22

Existing cycle facilities are in place locally only along Belgard Road, to the east of the development site. The development site does not however extend this far to the east, so does not adjoin these facilities. Accordingly, it is not proposed to upgrade these as part of the proposed development.

SDCC note that the applicant will be developing out to the kerb line on three sides of the location, Belgard Square East, Belgard Square North and Belgard Road, the applicant is requested to provide cycle infrastructure to the surrounding public areas on all roads the front this development, the cycle facilities should match with any existing infrastructure and improve where possible.

Development Servicing and Waste Collection

The applicant has proposed a vehicular servicing of the proposed development shall be accommodated by proposed new loading/set-down bays on Belgard Square North, along the northern boundary of the development site.

Bin stores shall be located internally at undercroft level within the development, and the development’s Management Company shall have responsibility for organising refuse collection. Refuse bins shall be transferred to a suitable kerbside location shortly before

collection by an authorised waste contractor and returned to the bin stores immediately thereafter.

It is not acceptable to allow refuse collection from such a large-scale development from public road. It is most likely that the development will produce a significant amount of waste that will require 1100ltr containers. These containers will be placed in the public realm for collection.

The laybys shown outlined in blue on the taking in charge map should not be used to collect waste from the development. To retain these in the management companies' remit may lead to confusion for public parking. These areas are currently in public ownership and would need to be transferred to the management company.

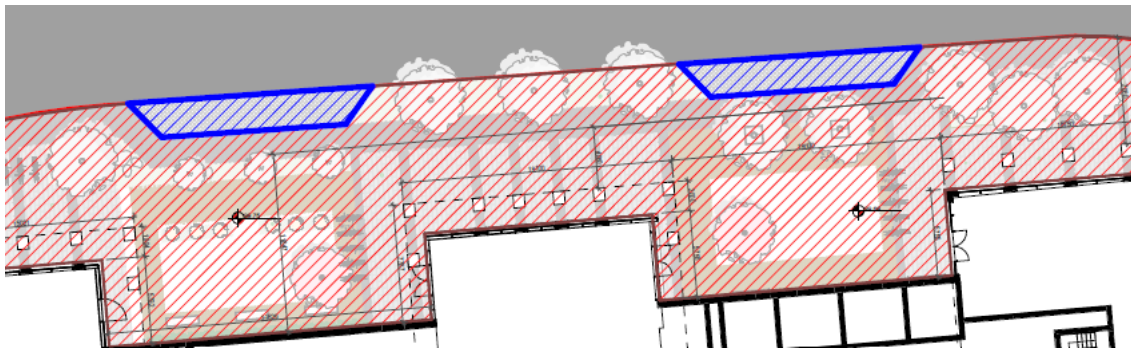


Figure 3 Waste set-down areas

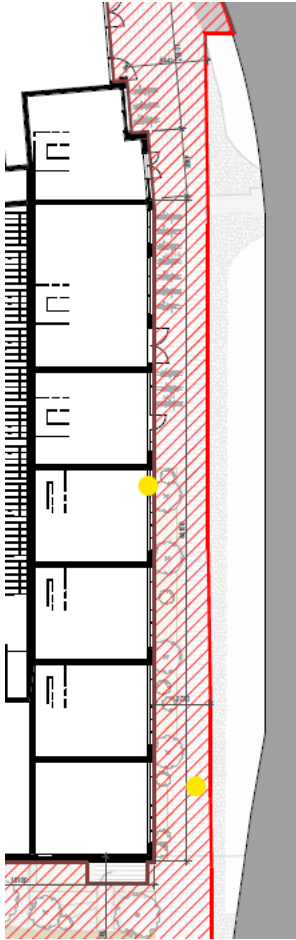


Figure 4 Taking in Charge boundary

As shown in Figure 4 the taking in charge map supplied by the applicant the building line extends onto the public realm. The balconies and doorways along the east side of the development cross over into the public realm. Having balconies overhanging the public space is not acceptable and the build line should be reduced to accommodate the public space.

Swept Path Analysis

Details of vehicle access to the undercroft parking have been submitted. The swept path analysis demonstrates vehicles accessing the parking spaces. The applicant was requested to provide parking spaces of size 5.0m x 2.5m with 6m reversing distance to help access and egress from the parking spaces. The applicant has replied with the following:

“Response to Recommendation 6

Aisle widths within the development’s undercroft and basement car parking areas allow a reversing distance of 6.0m at parking spaces, to accommodate car parking manoeuvres. All car parking spaces within the development are 4.8m long by 2.3m wide, in accordance with guidance given in the IStructE Design Recommendations for Multi-Storey and Underground Car Parks.”

SDCC contend that a parking space of 2.3m width is very narrow and although the applicant has detailed auto tracks of vehicles accessing the spaces it doesn’t highlight door opening spaces. The applicant is requested to provide parking spaces at least complainant to DMURS of 2.4m wide.

“The standard width of a space should be 2.4m.”

The fire tender access through the emergency access road to the south of the development is also noted.

The applicant was requested to provide details of the vehicle access for Belgard Square East. The access should be 6.0m wide with a 1.8m wide pedestrian footpath. The applicant will not be providing pedestrian access along the vehicle ramp. The layout of the vehicle access suggests that cars will access one at a time (there is a yield triangle shown on the layout), resulting in queuing outside on the public footpath, this may result in a blocked footpath or cause traffic hazards along Belgard Square East.

“8.2.4 SDCC Roads Dept Recommendation 4

“The main vehicular access and egress road onto Belgard Square East shall be 6.0m wide with a 1.8m wide pedestrian footpath.”

Response to Recommendation 4

*Please refer CS Consulting drawings **BR-CSC-ZZ-00-DR-C-0003** and **BRCSC-ZZ-00-DR-C-0016**, which show the details of the main vehicular access and egress on Belgard Square East. A 6.0m-wide carriageway is provided at this location into the development’s undercroft parking area; no pedestrian footpath is however provided, as this is not intended to be used as a pedestrian access.”*

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

A DMURS report has been submitted, the report does not go into much detail on the dimensions of the internal vehicle layouts, instead concentrated on the parking rates for cars and bicycles.

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

A taking in charge layout has been supplied. There are a few items that need to be addressed, the proposed private loading areas along Belgard Square North and the balconies that overhang the public space along Belgard road.

18. Site Specific Construction and Demolition Waste Management Plan.

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

Roads department have the following observations:

1. The applicant is requested to contact the Dublin Cycle South office directly and coordinate any future proposals for cycle infrastructure in the area.
2. The applicant should provide segregated cycle infrastructure to link with any existing or proposed along all frontages of the proposed development.
3. Refuse collection from this development should not be from the public realm on Belgard Square North, all refuse collection should be contained within the curtilage of the development
4. The loading/servicing areas on Belgard Square North should be removed from the public realm, the loading and unloading of vehicles should be contained within the development. The areas highlighted in blue on the Taking in Charge drawing are in public ownership and cannot be surrendered to a management company.
5. The undercroft parking spaces if not conforming to SDCC recommendation of 2.5m width then should confirm to DMURS of 2.4m wide.
6. The balconies that overhang the public realm along Belgard Road and the doors that open out on the public space should be reconsidered.