

**SHD3ABP-313760-22– Mixed-use development with 310 Build-To-Rent residential units, 10 retail/café/restaurant and office/services units and a childcare facility**

**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 .
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.

**Local Area Plan and County Development Plan**

The Tallaght Local Area Plan came into effect in June 2020. The Plan was prepared subsequent to national guidelines relating to apartment standards and building heights, and was approved by the Office of the Planning Regulator. The Plan states in chapter 1 under 'Policy Context' that it is consistent with these guidelines and the Specific Planning Policy Requirements contained within them.

The South Dublin County Council Development Plan 2022 – 2028 came into effect in August 2022. The Plan was prepared subsequent to national guidelines relating to apartment standards and building heights, and was approved by the Office of the Planning Regulator. The Plan contains statements and policies in the Core Strategy (Chapter 2) and Appendix 1, which

confirm the overall compliance of the Plan with national and regional settlement strategy, other national and regional policy objectives, and with all s.28 Ministerial guidelines.

The County Development Plan provides for the implementation of Local Area Plans subject to relevant national guidelines. As noted above and endorsed by the Office of the Planning Regulator, the Tallaght Town Centre Local Area Plan complies with all relevant s.28 national guidelines.

### **Proposed Development**

The proposal comprises a mixed-use development including: 310 no. “Build-to-Rent” residential apartments, a creche and a number of commercial units (c. 2,289 sqm) on a c. 1.26 ha. site.

The proposed development will consist of the demolition of existing boundary wall and construction of:

1. c. 2,289 sqm of retail/commercial floor space across 10 no. units including retail, restaurant/café and Class 2 financial/professional services and office use, and a crèche (257sqm) at ground and first floor levels;
2. 310 no. build to rent residential apartments including:
  - 99 no. one bedroom units,
  - 203 no. 2 bedroom units and
  - 8 no. three bedroom unitswithin a part 6 to part 12 no. storey development across 3 blocks over partial basement;
3. c. 2,223 sqm of communal external amenity space provided in the form of a ground floor garden and external terraces at fifth, sixth, seventh and eighth floor levels; c. 1,026 sqm of public open space provided in the form of a central courtyard with landscaped areas at site perimeters;
4. c. 1,785 sqm of resident support facilities and services and amenities provided at basement, ground and first floor levels;
5. Vehicular access to the basement development from a new access point at Belgard Square East;
6. A new tertiary route provided in the southern part of the site linking Belgard Square East and Belgard Road;
7. Provision of 130 no. car parking spaces (including 8 no. club car spaces and 6 no. disabled access spaces) at basement level in addition to 5 no. set down spaces (4 no. serving creche) and 1 no. disabled access space at ground level, layby on Belgard Square East, 6 no. motorcycle spaces and a total of 763 no. bicycle parking spaces;
8. Provision of 4 no. Ø0.3m microwave link dishes to be mounted on 2 no. steel support pole affixed to lift shaft overrun, all enclosed in radio friendly GRP shrouds, together with associated equipment at roof level at Block B;
9. Provision of 3 no. ESB substations with switch rooms and plant rooms at basement level, hard and soft landscaped areas, bin and bicycle stores, public lighting, attenuation, green roof, plant at roof level, service connections and all ancillary site development works.

The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant development plan and 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.

### Development Statistics

<b>Overall</b>	<b>Stage 2</b>		<b>Stage 3</b>	
<b>Tenure</b>	Build to Rent		Build to Rent	
<b>Total Apartment Units</b>	326		310	
<b>Commercial/Retail</b>	1436 sqm		2,289 sqm	
<b>Unit Mix</b>				
<b>Studio</b>	0	0%	0	0%
<b>1-Bed</b>	110	34%	99	32%
<b>2-Bed</b>	216	66%	203	65%
<b>3-Bed</b>	0	0%	8	3%
<b>4-Bed</b>	0	0%	0	0%
<b>Total Units</b>	326	100%	310	100%
<b>Development</b>				
<b>Gross Site Area</b>	0.9 Ha.		1.26 Ha.	
<b>Net Site Area</b>	0.9 Ha.		0.91 Ha.	
<b>Net Density*</b>	360 DpH		342.2 DpH	
<b>Building Height</b>	6 - 12 Storeys		6 - 12 Storeys	
<b>Gross Floor Area</b>	39,757 sq.m		32,624 sq.m	
<b>GFA (excl. basement)</b>	Not Stated		30,652 sq.m	
<b>Plot Ratio</b>	3.75		3.38	
<b>Site Coverage</b>	46%		49%	
<b>Dual Aspect</b>	53%		48%	
*rounded up from 359.7 units per ha				
<b>Amenity Space &amp; Facilities</b>				
<b>Public Open Space</b>	1,306 sq.m		1,306 sq.m	
<b>Communal Open Space</b>	2,337 sq.m		2,223 sq.m	
- Ground Level			452 sq.m	
- Roof Spaces			1,771 sq.m	
<b>Resident Support Facilities &amp; Amenities (Internal)</b>	1,553 sq.m		1,785 sq.m	
<b>Creche Facility</b>	266 sq.m		257 sq.m	
<b>Parking</b>				
<b>Car Parking</b>	149		131	
- Basement Level	144		130	

- Surface Level	5	1
<b>Residential CP Ratio</b>	0.37	0.42
<b>Bicycle Parking</b>	631	763
- Long Stay Secured/Sheltered	431	529
- Staff		20
- Short Stay	200	159
- Retail Visitor		55
<b>Res Cycle Parking Ratio</b>	1.9	2.2
<b>Motorcycle Parking</b>	6	6

### **Procedural Note and Summary of Pre-Planning Consultation**

#### **SHD1SPP009/20**

The applicant has engaged in preplanning consultation in relation to the subject site as documented under Reg. Ref. SHD1SPP009/21, held on the 22<sup>nd</sup> of July 2021.

This was a proposal for built-to-rent residential development comprising 327 apartments, commercial and retail units at ground floor level, including internal and external amenity space, surface and basement car and bicycle parking, landscaped pedestrian link to Tallaght town centre, site wide landscaping and all associated services and infrastructure required to facilitate the development.

Some main points of the pre-planning discussion were as follows:

- The Centre provisions and Urban Structure in the LAP.
- Plot ratio range.
- Building height standards residential 4-6 storeys on the south and west elevation and 6-7 on the north and east elevation. Figure 3.3 does not contain potential for higher buildings at this location.
- Proposed tertiary route to south (local route/homezone).
- Mixed use frontage along west and east site boundaries.
- Mix to be a minimum of 30% three beds (page 89 of LAP) and at least 30% owner occupied (page 92).
- HeatNet.
- Within a Zone of Archaeological Potential.
- No public open space. Page 101 of the LAP Supplementary Development Contribution Scheme re strategic open space etc may be required. Will walkway/route to south be gated with controlled access.
- Advised to orientate drawings north to south.
- Roads – detailed design for access, secondary access in case of blockage/emergency.
- Parks – break down of open space, play opportunities, quality of open space, permeability, landscape detail.
- Water Services – to the west of the site is an existing surface water sewer, setback required, surface water, connections to Irish Water infrastructure, capacity constraints downstream, flood risk assessment.

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

**SHD2ABP-311896-21:** The applicant lodged a stage 2 pre-application and a tripartite consultation meeting was held on 4<sup>th</sup> February 2022. In its Opinion prior to the meeting, and in the meeting itself, South Dublin County Council advised the following:

- **Principle of Development** The Planning Authority fully support the appropriate development on these vacant brownfield lands, which are zoned for Town Centre development.
- **Mix of Uses** The proposed quantum of uses is inappropriate. The provision of commercial and retail is too low to consider the development to be ‘mixed use’ as identified in the Town Centre zoning objective. The limited quantum of retail space is not acceptable, given the site is located within the Tallaght Core Retail Area and a Retail Opportunity Site.
- **Material Contravention** The proposed development represents a material contravention of the Local Area Plan with regard to:
  - The Building Height Strategy by 1 to 5 storeys.
  - Plot Ratio by 87.5%.
  - Unit Mix by not providing any 3 bed residential apartments.
  - Tenure by only providing Build To Rent apartments.
- **Building Height and Plot Ratio** The proposed height and plot ratio of the development should be reduced to match the standards provided for in the Tallaght Town Centre Local Area Plan 2020 – 2026, and that the design of the scheme should reflect the transition of heights across the site identified in the LAP, and furthermore that building height to the tertiary link street to the south should reflect the status of that street.
- **Unit Mix** The applicant should revise the unit mix to meet the Plan requirements (minimum of 30% 3 bed units).
- **Tenure** The applicant should revise the proposed tenure of the development so that owner occupied units are provided.
- **Public Realm** Further detail should be provided on the proposed public realm, and this is designed so that it can be considered a significant enhancement to the current streetscape.
- **Public Open Space** The proposed public open space in its current form, due to the location, absence of connectivity and proximity of tall buildings, will not be a valuable contribution to Town Centre. Concerns are raised regarding the function of the space as public and the quality/level of amenity. The Planning Authority consider the subject site to be of significant size in the context of a Town Centre and consider the provision of a meaningful open space to be feasible. Further consideration required.
- **Surface Water** Insufficient Sustainable Urban Drainage System (SuDS) measures are being considered as part of the development.
- **Energy** The proposed development should integrate with the HeatNet district heating system which is supported by South Dublin County Council as per Section 7.4.5 of the LAP. The applicant is encouraged to engage with SDCC on this issue.

## **Development Context**

### **Description of Site and Surroundings**

The subject site is located within the centre of Tallaght to the west of the original Tallaght Village. The site is bounded by Belgard Square East to the west, Blessington Road to the north, Belgard Road (R113) to the east and a site comprised of a fast food restaurant to the south. The

site is currently comprised of surface car parking and areas of recolonising vegetation. At the time of the site visit (30<sup>th</sup> of November 2021) it did not appear as though the site was in use. The accesses are currently gated off. There is some mature vegetation along the boundaries of the site. Along the outside of the boundary wall on the east is a hedgerow. The site is largely flat in ground level.

The site adjoins an NTA secondary cycle route to the east as well as a Bus Connects bus corridor to the north.

### Site Area

Net site area of 0.906 Ha.

Red line boundary includes spur up Belgard Road to give total site area of 1.12 Ha.

### **Site Visits**

Various site inspections have taken place in 2020, 2021 and 2022. The most recent took place on Thursday 28<sup>th</sup> July.

### **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**

The subject site overlaps with the following layers (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):

- North-east corner of the site overlaps with the Tallaght Area of Archaeological Potential
- North-east corner also overlaps with the Record of Monument and Place Dúchas No. 021-037 Class: Town Location: Tallaght.

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	Seeks Clarifications.
Housing	Recommends Conditions.
Public Realm	Recommends Conditions.
Roads	Comments Provided.

#### **External Consultees**

An Taisce	Objects to development.
Department of Defence	Recommends Conditions.
Irish Water	Recommends Conditions.
Inland Fisheries Ireland	Recommends Conditions.
National Transport Authority	Recommends Conditions.

#### An Taisce

- Material Contravention of TC Town Centre Zoning Objective due to underprovision of retail/commercial uses (7% of development)
- Building Height, bulk, massing and design are material contravention of the Tallaght LAP and would not integrate into the character of the county or the town, and would not respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties.
- Density on site is excessive and provision of open space is inadequate.

#### Department of Defence

- Seeks 30 day notice prior to use of cranes.

#### Inland Fisheries Ireland

- Recommends mitigation measures in Outline CEMP are implemented.
- Recommends that a revised CEMP should be robust in identification of impacts and mitigation measures, and should provide a mechanism for ensuring compliance with environmental legislation and statutory consents.
- Recommends practices on-site to protect waterways.

#### Irish Water

See Water section of Assessment.

#### National Transport Authority

- Subject site is suitable for high density development.
- Recommends that Drawings are revised to include the removal of the left-turn slip road from Belgard Road onto Blessington Road to reflect the current preferred Bus Connects design at this location.
- Recommends that the applicant be required to continue to liaise with the NTA with regard to detailed design considerations at the interface between the development and the CBC in order to support the implementation of the CBC.
- Recommends that a cycle track is provided north of the site on Blessington Road, in order to provide a link on the main road for cyclists travelling north from Belgard Road on to Belgard Square East.

### **Third Party Observations**

A third party observation was received from John Conway and the Louth Environmental Group:

#### 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 on Urban Development and Building Height’ (2018), and the Board is therefore precluded from granting permission.
- Proposed development is not of strategic or national importance.
- Application does not comply with 2016 Act or 2001 regulations in terms of materials provided.
- It has not been shown that there is adequate infrastructure to support the proposed development in terms of public transport, drainage, water services and flood risk.
- A grant of permission by the Board would breach the SEA Directive due to its undermining of the Tallaght Town Centre LAP.
- The development is contrary to BRE guidelines.
- The development breaches the South Dublin County Council Development Plan 2022 – 2028 policy on Build-to-Rent developments, as it is wholly build-to-rent.
- Concern that this part of Dublin is becoming saturated with this type of development.
- 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.
- The proposed development and documentation provided do not comply with the Planning and Development Regulations 2001 as amended. The Scoping exercise does not provide adequate information on the opinion of consultees.
- The information supplied is not adequate to undertake an EIA screening, due to insufficient surveys, lack of assessment of the cumulative impacts of the development; lack of assessment against increased needs for schools, childcare and medical care; lack of detail regarding impact on biodiversity and human health; basis being an incomplete description of development.
- The SHD process does not allow for full informed public consultation in relation to EIA screening.
- The Board lacks proper ecological and scientific expertise to examine the EIA Screening Report.
- 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 27<sup>th</sup> June 2022. The objections provided by elected members are summarised below:



Cllr O'Connor

- Huge change to area
- Pressure on local facilities and road network

Cllr Sinclair

- No faith in ABP decision making
- Build to Rent is no good for community and not solution to housing crisis
- Tenure mix is a nightmare – no family
- Public transport capacity issues
- Objection

Cllr Dunne

- Will there be a school analysis for the 1,000 apartments (4 current)
- Objects, especially to Build to Rent
- Environmental impact of the c1000 apartments
- Bad planning decisions by ABP – Citywest an example. Poor parking.
- Common sense – these proposals are bad planning if approved
- Need to learn from previous mistakes
- Greed over people
- Housing crisis but this is not a contribution to sustainable communities
- School place concerns

Cllr Costello

- Would welcome appropriate development on Woodies site.

Cllr Holohan

- Concerns over the overshadowing
- Decision making concerns on planning applications

Cllr Duff

- Woodies site – previous proposal was ok, objects to current proposal
- Concerns over how this fits in to Town Centre plan

### **Relevant Planning History**

#### **Subject Lands**

##### **SD16A/0195**

An above ground natural gas pressure reduction unit measuring 1.42m x 0.51m x 1.8m (L x W x H) and a 3m high 'lamp post' style relief vent stack together with ancillary services and ancillary site works. **Permission granted.**

##### **SD09A/0419**

The construction of a 5 storey over basement level car park mixed use development of 26915sq.m. gross floor area comprising:

- retail use of 6339sq.m., together with cafe/restaurant use of 297sq.m. and entrance foyer for the cinema/leisure use of 115sq.m. at ground level;
- retail use of 6856sq.m. at 1st floor level;
- leisure/bowling use of 3321 sq.m. together with part cinema foyer/back of house of 2736sq.m at 2nd floor level; a 14 screen multiplex cinema of 6154sq.m. at 3rd floor level; a cinema projector floor of 1097sq.m. at 4th floor level.

- The development also includes a new landscaped public plaza at the corner of Belgard Square East and Blessington Road together with a new public street linking Belgard Square East to Belgard Road.
- The development also comprises 2 sub-stations at ground level on the southern elevation onto the proposed new street; provision of 240 no. car spaces and 200 no. bicycle spaces with vehicular access via ramp from Belgard Road and provision of services and plant at basement and roof level.
- The development also includes all associated site works, boundary treatments, signage locations/zones and landscaping all on a 0.91Ha site bounded by Belgard Road, Blessington Road and Belgard Square East (the former Woodies site).

Permission granted. Extension of duration of permission granted under SD09A/0419/EP.

#### SD04A/0975

Construction of a retail unit, a class II, two storey retail unit, storage and two storey creche at ground floor level over two level basement car parking with 4 to 5 storey apartments surrounding internal courtyards above ground floor level. The development will range from 5 to 6.5 storeys high.

- (1) The ground floor element consists of
  - (a) construction of a retail unit of 5965sq.m with additional storage area of 381sq.m.
  - (b) construction of an ESB sub-station and meter room,
  - (c) construction of a two storey Class II retail unit with ancillary offices on the upper mezzanine level, total 326sq.m.
  - (d) construction of a two storey creche 693sq.m.;
- (2) the upper floors consist of
  - (a) construction of 3 to 4 floors of apartments with a further recessed penthouse floor providing 42 3-bedroom units, 118 2-bedroom units and 63 1-bedroom units giving a total of 223 apartments (area of 14,612sq.m) of which 15% will be offered as social/affordable accommodation;
  - (b) construction of a residents laundry room 83sq.m. and children's play room 98sq.m located at first floor level;
- (3) construction of an ESB Sub-station and meter room;
- (4) construction of a 200 space LUAS park and ride car park located at basement level-1;
- (5) construction of a further basement level-2 car park providing 223 dedicated residential car parking spaces and 91 public parking spaces of which 150 spaces are re-located from the existing car-parking provision; construction of 12 commercial parking spaces and 3 drop-off spaces at surface (ground) level. Also proposed are landscaped courtyards to the first floor residential element, landscaped roof gardens to the central residential block, the construction of a queuing lane serving the basement car park and widening of existing public footpaths. Total site area 0.8981 hectares.

Permission granted. Extension of Duration granted under SD04A/097/EP.

#### **Lands to the south**

##### SD15A/0221

New canopies to the existing customer order points in the existing drive through lane.

Alterations to the north east elevation with the addition of a new booth window. Alterations

to the existing roof along with the addition of new signage over proposed booth window to match existing and associated works. **Permission granted.**

SD09A/0358 & ABP Ref. PL06S.236620

Alterations to existing drive thru lane: material alterations to existing roof including removal of existing dormer style roof signs to be replaced with new roof signs and new roof material; alterations to elevations including modification to booth windows; removal of existing site signage and height restrictor and installation of new site signage and height restrictor.

**Permission granted by SDCC.** First party appeal to ABP re Condition 2. ABP decided to amend condition.

SD03A/0914

(a) Single storey curved roof structure over previously approved children's play area. (b) New canopy over entrance to restaurant from carpark to their existing drive-thru restaurant.

**Permission granted.**

SD03A/0026 & ABP Ref. PL06S.202429

Alteration & extensions to their existing drive-thru restaurant, to include (a) single storey extension to the front to include coffee shop & seating areas, (b) alterations to roof signage & change of roof covering, (c) installation of children's play equipment. **ABP granted permission** (overturning a decision to refuse by SDCC).

**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’ (2018).

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, 2022 – 2028**

### Chapter 2 Core Strategy and Settlement Strategy

#### Policy CS1 Strategic Development Areas

##### Section 2.6 Total Land Capacity within Strategic Development Areas

Table 2.8 Total Land Capacity within Strategic Development Areas

Table 2.9 Capacity of undeveloped lands within South Dublin

Policy CS5 Lands for Employment

Section 2.7 Settlement Strategy

Policy CS6 Settlement Strategies – Strategic Planning Principles

Section 2.7.1 Dublin City and Suburbs

Section 2.7.1: Tallaght

Policy CS7 Promote the consolidation and sustainable intensification of development within the Dublin City and Suburban settlement boundary.

Chapter 3 Natural, Cultural and Built Heritage

Section 3.5.3 Architectural Conservation Areas

Section 3.5.3: 12. Tallaght Village

The character of Main Street today is largely defined by the attractive and substantially intact early twentieth century houses in the village.

Policy NCBH24 Adapting and Reusing Historic Buildings

Support and encourage the reuse and adaptation of historic, traditional, and older vacant and derelict buildings as a key component of promoting sustainable development and achieving compact growth and as a catalyst for the revitalisation of historic village and town centres.

Chapter 4 Green Infrastructure

Policy GI1 Overarching

GI1 Objective 4

To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.

Policy GI2 Biodiversity

Strengthen the existing Green Infrastructure (GI) network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council's commitment to the National Biodiversity Action Plan 2021-2025 and the South Dublin County Council Biodiversity Action Plan, 2020-2026, the National Planning Framework (NPF) and the Eastern and Midlands Region Spatial and Economic Strategy (RSES).

Policy GI4 Sustainable Drainage Systems

Require the provision of Sustainable Drainage Systems (SuDS) in the County and maximise the amenity and biodiversity value of these systems.

GI4 Objective 3:

To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.

GI4 Objective 4:

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

#### GI1 Objective 7

To develop linked corridors of small urban ‘Miyawaki’ native mini-woodlands, a minimum of 100 sq m in size, to capture carbon and encourage biodiversity in suitable existing built-up areas, in low grade parkland, and other areas of zoned lands where deemed suitable and appropriate.

#### Section 4.3.1 Components of the GI Network

Figure 4.4. Green Infrastructure Strategy Map

#### Chapter 5 Quality Design and Healthy Placemaking

Policy QDP1 Successful and Sustainable Neighbourhoods

Policy QDP2 Overarching – Successful and Sustainable Neighbourhoods

Policy QDP3 Neighbourhood Context

Policy QDP4 Healthy Placemaking

Policy QDP5 Connected Neighbourhoods

Policy QDP6 Public Realm

Policy QDP7 High Quality Design

Policy QDP8 High Quality Design – Building Height and Density

Policy QDP8 Objective 2

Policy QDP9 High Quality Design - Building Height and Density

Policy QDP10 Mix of Dwelling Types

#### Policy QDP14 Local Area Plans

Prepare Local Area Plans as appropriate, prioritising areas that are likely to experience large scale residential or commercial development or regeneration.

#### QDP14 Objective 1:

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

#### Chapter 6 Housing

Policy H1 Housing Strategy and Interim Housing Need and Demand Assessment

Policy H7 Residential Design and Layout

Policy H8 Public Open Space

Policy H9 Private and Semi-Private Open Space

Policy H10 Internal Residential Accommodation

#### Chapter 7 Transport and Movement

Policy SM1 Overarching – Transport and Movement

Table 1 7.1 Cycle South Dublin Routes and Projects

Policy SM2 Walking and Cycling

Policy SM3 Public Transport – General

Policy SM3 Public Transport – Bus

Policy SM3 Public Transport – Rail, Transport Interchange and Park and Ride

Table 7.5 Six Year Road Plan  
Policy SM5 Street and Road Design  
Policy SM6 Traffic and Transport Management  
Policy SM7 Car Parking and EV Charging

Chapter 8 Community Infrastructure & Open Space  
Policy COS2 Social / Community Infrastructure  
Policy COS3 Community Centres  
Policy COS5 Parks and Public Open Space – Overarching  
Section 8.7.3 Quantity of Public Open Space  
Policy COS7 Childcare Facilities

Chapter 9 Economic Development and Employment  
Policy EDE1 Overarching  
Policy EDE1 Objective 5  
Intensification of industrial lands and mixed-use development at the City Edge / City Edge Strategic Framework area and in Tallaght Town Centre / Cookstown while ensuring, to the greatest extent possible, the sustainability of existing businesses and employment.

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

Section 9.4 South Dublin County’s Retail Strategy  
Table 9.1 Retail Hierarchy  
Table 9.2 Settlement Hierarchy and Retail Hierarchy  
Policy EDE8 Retail – Overarching  
Section 9.5 Core Retail Areas  
Figure 9.1 Tallaght Core Retail Area  
Policy EDE9 Retail – Tallaght Town Centre  
EDE9 Objective 5:

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

Chapter 10 Energy  
Policy E3 Energy Performance in Existing and New Buildings  
Policy E4 Electric Vehicles  
Policy E5 Low Carbon District Heating Networks

Chapter 12 Implementation and Monitoring



## 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**

The site is zoned 'TC' – "To protect, improve and provide for the future development of Town Centres". The proposed uses (residential, café/restaurant, shop, creche, residential facilities) are permitted in principle under this zoning objective.

### **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 Statement**

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 County Development Plan 2022 – 2028. The Statement relating to the County Development Plan 2022 – 2028 and the Tallaght Town Centre Local Area Plan 2020 is the relevant document, as the 2016 – 2022 County Development Plan has expired.

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 or noted by the Planning Authority:

- The majority of the development exceeds the LAP height requirements, by a range of 1 - 5 storeys.
- 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.
- Policy H1 Objective 12 of the County Development Plan also provides for a minimum unit mix of 30% 3-bed units, with caveats.
- The use of 100% BTR is therefore a material contravention of the LAP.
- The development would not comply with CDP policies QDP14 Objective 1 and UC6 Objective 1, which each require that development complies with the provisions of the Local Area Plan.

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.

The development is not a development of strategic or national importance. It is one of many sites within the LAP and the Greater Dublin Area which are proposed for and are suitable for residential development; it would not contribute to the success or delivery of any national infrastructure or similar goals, except as part of a much larger regeneration / redevelopment of the Tallaght area. National, regional and local policies can be achieved without the development of the subject site, and certainly without the precise development proposed as part of this application. Alternative approaches or uses could be accommodated on the site in line with the LAP and without compromising the implementation of the National Planning Framework or any of the other policy documents noted in section 2 of the applicant's Material Contravention Statement.

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 South Dublin County Development Plan 2022 – 2028 was informed by an Interim Housing Needs Demand Assessment, pending completion of a Dublin-wide HNDA.

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 advised at stage 2 that the development exceeded the building height and plot ratio standards in the LAP by a considerable margin. The Planning Authority cannot support the development in its current form on this basis.

In terms of unit mix, 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.

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

### **Visual Impact, Design, Layout and Integration**

#### **Visual Impact**

The applicant has provided a Design and Townscape Visual Assessment. The assessment includes 16 no. verified views of the proposed development. Due to the height and scale of the development it would be visible from the wider Tallaght central area. The proposed development would appear bulky on all sides, in particular when viewing the north-east corner.

#### **Sunlight/Daylight Amenity**

##### **Impact on / Prejudicing development on Adjoining Sites (Sunlight / Daylight)**

The site is bounded on three sides by existing streets. The applicant has provided a Daylight Impact Assessment for neighbouring properties (See report 1 of 3 by BGP3), and reports on the amenity available for the subject development (report 3 of 3 is considered relevant, utilising the adaptation of new European Standard EN 17037, BS EN 17037). The report is stated to respond to a request “to consider the impact of the proposed development on the development potential of neighbouring sites and consideration of any potential impacts of adjacent development on the amenity of future occupiers of this proposed development.”

Though the Board did not request exactly this in their Opinion Report, it is nonetheless notable that the assessments provided do not analyse the impact of the subject development on the development potential of adjoining sites, or vice versa, though the LAP contains an urban framework with which such an assessment could be made.

Of particular concern at this site is the potential impact on or from the site to the south (currently the McDonald’s site). This site is zoned ‘Town Centre’ and has the same height restrictions under along its northern elevation, under the LAP, as the southern elevation of the subject site. The proposed development provides for 6 and 8 storey development at a distance of approximately 10 metres from the site boundary. Equivalent development on the adjoining site,

at a total separation distance of 20 metres, would have an impact on sunlight and daylight in the proposed scheme that is not picked up by the reports submitted with the application. BRE 209 'Site Layout Planning for Daylight and Sunlight' (2011) provides in section 2.3 a number of principles for dealing with adjoining development land, with the following guidance:

“From a daylight standpoint it is possible to reduce the quality of adjoining development land by building too close to the boundary. A well designed building will stand a reasonable distance back from the boundaries so as to enable future nearby developments to enjoy a similar access to daylight. By doing so it will also keep its own natural light when the adjoining land is developed.”

This guidance provides a number of indicative calculations for establishing if future development will impact the subject site and vice versa, assuming that the development will be mirrored on the adjoining site – this is a fair assumption in this case as the Tallaght LAP sets out equal restrictions on the two elevations that would face each other. The proposed development fails these calculations, suggesting that **the proposed development should be reduced in height or bulk, or the separation distance to the southern boundary increased.** Alternatively, analysis of a hypothetical mirror image building to the south should have been undertaken to test daylight levels. The present design has the potential **to prejudice development on the site to the south.**

This is a weakness of the proposed layout and an issue the Board should consider. It should be noted however that this issue may be mitigated with a reduction in height as sought by the Planning Authority, and the use of setbacks at upper levels from the southern site boundary.

The assessment of open spaces along the southern boundary is also of limited use given the development potential of the adjoining site. It is noted that the creche playground is located at this boundary.

#### Amenity Value for potential Occupants

Notwithstanding comments above concerning the potential prejudicing of development on the site to the south, and loss of designed amenity for the subject site in the event of future development, the report on Sunlight / Daylight provided shows that 96% of rooms will receive adequate levels of light as per BS EN 17037. This illustrates that the perimeter block design is generally appropriate.

#### **Layout**

##### Ground Floor Interface

The mix of commercial and communal units at ground floor level is generally welcomed. It is noted that the Local Area Plan seeks mixed-use frontage on the west and eastern elevations of the site, and a fine urban grain treatment along the northern elevation.

In general, the layout of ground floor uses is acceptable; however, units along the front elevation should be subdivisible in order to achieve a fine urban grain and provide flexibility to achieve this at that location. This can be a **condition** in the event of a grant of permission.

##### Transport Infrastructure

The NTA and the Roads Department has each recommended the provision of a westbound cycle lane along Blessington Road, to the north of the development, and a north bound cycle lane on Belgard Road in order to improve the cycle network in the area as part of the regeneration / redevelopment of the site.

The NTA has similarly sought that works are undertaken to remove the northbound left slip-lane at the Belgard Road / Blessington Street junction, in support of Bus Connects design for that junction. The subject site adjoins a Bus Connects bus corridor route along Blessington Road, although no bus stop is located here.

**Conditions** should be applied in the event of a grant of permission to ensure the delivery of the cycle lane, removal of the slip road, and to ensure that the applicant and NTA continue to liaise and agree a final layout of the adjoining street network in line with BusConnects and with a view to improve sustainable travel options in the area. Additionally, South Dublin County Council should be party to such an agreement, which shall also provide that final layouts comply with DMURS guidance and support the urban framework of the Tallaght Town Centre Local Area Plan 2020.

#### Tertiary Route through the development

The Architects layouts and Engineering drawings supplied show the tertiary route as having cycle and pedestrian access only, while also providing vehicular access for deliveries, refuse vehicles and fire tenders, and providing a mobility accessible parking space in the middle of the development. The Engineering roads layout shows a two-lane carriageway with a junction onto Belgard Square East and a yellow box at this junction. The layout plans also show that refuse collection points will be located in this area and that refuse vehicles will enter the site along the tertiary route to collect waste.

The only vehicles envisaged to use the street are refuse collection vehicles, delivery vehicles, fire tenders, taxis, and vehicles using the accessible parking space. With this very low volume of traffic, the route should be redesigned as a shared surface primarily catering for pedestrians and cyclists, with provision only as necessary for vehicular traffic. The carriageway width of 6 metres is excessive, and the design is hostile to pedestrians given the low status of the route for vehicles (section drawings show 12.2m of a section for vehicular space compared to 5 metres for foot traffic). Alternatively, this should be a shared pedestrian/cycle space capable of providing fire tender access in emergencies, but otherwise not providing for vehicles. A redesign of this route is required by **condition** in the event of a grant of permission.

Additionally, **conditions** should apply in the event of a grant of permission to provide for final agreement on access arrangements for deliveries and refuse vehicles, as well as the final location of accessible parking, noting the possibility of restricting vehicular access to this route entirely, with the exception of a fire tender (which does not require a carriageway surface).

#### **Mixed-Use Frontage and Commercial Footprint**

As per Figure 9.1 and Policy EDE9 Objective 5 of the South Dublin County Council Development Plan 2022 – 2028, the site is part of the Tallaght core retail area, and is earmarked as a retail opportunity site for the town centre. The proposed development provides mixed-use frontage to the north, west and east elevations of the development. Frontages include resident's entrance lobbies, retail/restaurant units, office units and creche car park.

Having regard to the above, and the requirement for fine urban grain on Blessington Road, the mix of uses at ground floor level is therefore considered to be acceptable.

### **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. Norton (2016) finds urban grain to have a small but noticeable difference on the activities of a street.

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

The Planning Authority would therefore recommend that:

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

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

### **Open Spaces**

The applicant has proposed that the central courtyard space will be public open space, with all communal open space provided in roof terraces above. This is an acceptable layout in general terms but requires **conditions** that the courtyard shall not be gated and will have full public access, and additionally attention is required as to active uses/frontage onto the space.

The public open space is not proposed to be taken in charge and would be situated above an underground car park. The Public Realm section has made comments in relation to the functionality of the space viz. biodiversity and green infrastructure, and the natural SUDs element of the development.

The ground floor frontage onto the public open space consists of communal residential facilities, a commercial bin store, and the rear accesses to commercial units. As noted above, a bin collection point is set into the periphery of the public open space. The combination of layout (internal to the development), poor frontage onto the space and interaction with residential functions such as a bin collection area, provides for a defensive layout and protection of the space as de fact communal, rather than public.

The arrangement is considered to be contrary to Policy COS5, Objective 16, of the South Dublin County Council Development Plan 2022 – 2028.

The Planning Authority consider the subject site to be of significant size in the context of a Town Centre and consider the provision of a meaningful open space to be feasible. The preference of the Planning Authority is for the delivery of a meaningful open space with active frontage of retail/ commercial, or own-door ground floor residential. In the event of a grant of permission, the layout of uses around the public open space should be the subject of agreement

pursuant to a **condition**. However, the incoherent layout of uses around the public space can also be considered to be a **reason for refusal**.

## **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.

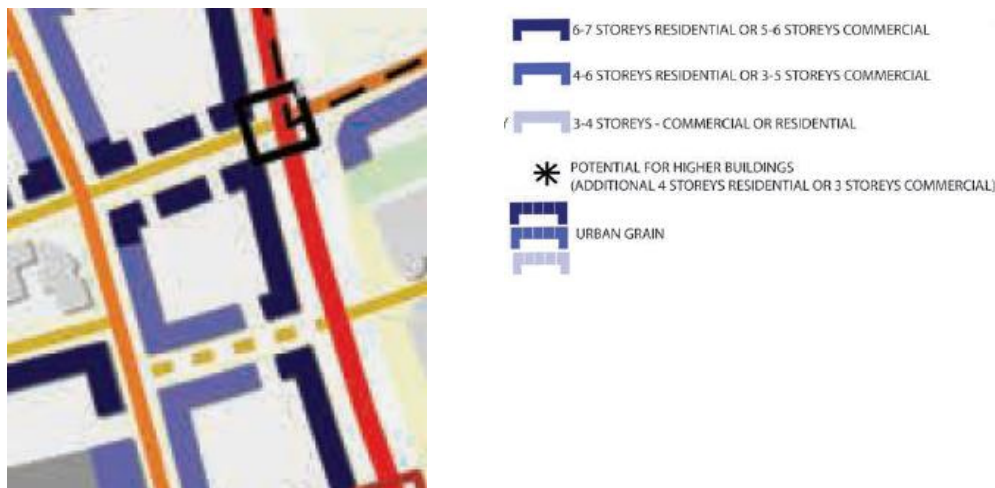
The proposed net density is **342 dwelling per Ha**. The site is located in a ‘central and/or accessible location’ as per the 'Sustainable Urban Housing: Design Standards for New Apartments' (2020) and is therefore considered suitable for high density development.

## **Local Area Plan Basic Standards on Height and Plot Ratio**

### **Height**

The proposed development is 6, 7, 8, 10, 11 and 12 storeys in height, with a rooftop garden and circulation area above. The development steps down to the south and west generally, with 10, 11 and 12 storeys elements concentrated on the north of the perimeter block.

The northern block provides for 7-storeys to the west, 10, 11 and 12 storeys to the north, and 8 storeys to the east. The southern linear block provides 8 storeys on its eastern frontage to Belgard Road, and 6 storeys otherwise.



**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 Blessington Road 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 exceed the basic height standards of the LAP.

### 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 proposed plot ratio is 3.38, based on a site area of 0.906 Ha. The proposed plot ratio significantly exceeds the basic plot ratio standard found in the LAP by 35%.

### **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.”

There are no adjoining buildings which meet or exceed the heights set out in the LAP for this site.

#### Criterion 3: Placemaking and Public Transport

The LAP provides for additional height at sites in close proximity to transport nodes or urban squares. 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.”

Having regard to the BusConnects designs for the Greenhills to City Centre preferred route (released in March 2022), the subject site is not directly adjacent to a public transport node as described. The route passes the site on Blessington Road, but the nearest bus stop is approx. 200m away on Belgard Square East.

### 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 3.0 – approximately 20% above the basic maximum plot ratio standard.

It is therefore possible under the LAP to achieve an acceptable plot ratio at the site, on the basis of the provision of the tertiary route through the site, and the reduction in heights down to the LAP standard.

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:

<b>1-Bed</b>	99	32%
<b>2-Bed</b>	203	65%
<b>3-Bed</b>	8	3%

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.

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 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.

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 Plan. 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 the 100% BTR nature of the scheme, having due regard to Objectives RE2 and RE 5, 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, built-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).

##### **Dual Aspect**

48% 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 provision 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 raises the following main concerns:
- Additional information/detail required in relation proposed play items contained within the landscape proposals. There seems to be insufficient play items proposed within the overall development.
- Lack of natural SUDS features provided, SUDS features proposed primarily consist of green roofs, local tree pits and rain gardens - details of tree pits incorporating SUDS required - Additional natural SUDS features should be incorporated into the proposed drainage system for the development such as permeable surfacing, constructed tree pits and rain gardens etc.
- Potential effect on amenity due to overshadowing and wind tunneling effect created by the tall buildings (6-12 storeys)

The report further comments:

The applicant shall provide clarification in relation to the following issues:

- i. The landscape strategy has made little provision for informal recreation within the proposed design proposals. Revised proposals to be provided by the applicant in this regard. Response should include revised layout and drawings.
- ii. The applicant has not provided details as to the levels and gradients within the proposed public open space areas. In addition, the applicant has not provided any cross sections/elevations through the landscape proposals. The developer shall submit level details for the open space, this shall include cross section drawings where applicable.

The report recommends 12 conditions relating to:

1. Landscape Design Proposals / comprehensive suite of landscape plans
2. Public open space / layout
3. Pedestrian access to the public space
4. Play provision
5. Arboricultural method statement

6. Tree bond (€18,099.99) and arboricultural agreement
7. Comprehensive SUDs Management Plan
8. Taking in Charge Proposal
9. Green Roofs
10. Rooftop Terraces
11. Biodiversity enhancement
12. Landscape management and maintenance

### **Ecology**

The applicant has provided an Ecological Impact Assessment. The report finds a low rate of bat activity, bird activity and mammal activity. Herring gulls were noted on the site but not noted to be nesting. Mitigation measures, mostly surrounding construction activity, are listed in section 7 of the assessment. The mitigation measures should be carried out in full and integrated into a Construction Environmental Management Plan, to be agreed by **condition** in the event of a grant of permission.

The Inland Fisheries Ireland submission calls for additional requirements to be implemented, and these should be addressed in any agreement of a CEMP by **condition**.

### **Access, Transport and Parking**

The Roads Department report provides the following 8 recommendations:

1. SDCC are aware that the NTA are in the process of finalising the design of the proposed Greenhills to City Centre Core Bus corridor. The applicant shall ensure that the northern and eastern boundaries of the proposed site shall integrate with the latest bus connects proposals for this location.
2. The developer shall deliver a one-way cycle lane along the northern boundary of the development that integrates with the latest Core Bus corridor proposals and north bound on the Belgard Road on the western boundary of the site.
3. The applicant has not satisfactorily addressed the following request: “Further clarification and elaboration for the documents as they relate to the design and function of the proposed Tertiary Road linking Belgard Road with Belgard Square East. The intent with regard to the taking-in-charge of this road should be clearly stated.”
4. Prior to commencement a developed Construction Demolition and Waste Management Plan shall be agreed by SDCC and lodged on the planning file.
5. Prior to commencement, SDCC will require a public lighting scheme to be agreed with South Dublin County Council Lighting Department.
6. The applicant should liaise with the Active Travel Team to ensure appropriate cycle connections are made to existing and planned cycle routes adjoining the proposed development.
7. Further detailed design of all proposed vehicular accesses is required.
8. The proposed creche car parking and set down area is not an efficient layout.

Conditions are noted and are recommended in the event of a grant of permission. The first three comments have been dealt with above under the Layout section.

## **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 Department of Defence requests a 30-day notice of any crane activity. This is acceptable and can be added as a **condition** in the event of a grant of permission.

### **Taking in Charge**

The applicant has provided a Taking in Charge plan, which does not provide for the taking in charge of either the tertiary route or the public open space. These are each located over the basement car park of the development. Final taking in charge proposals should be agreed **by condition** and all items to be taken in charge should be constructed to the relevant standards.

### **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.

## **Conclusion**

The Tallaght Town Centre Local Area Plan 2020 - 2026 and 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 County Development Plan (adopted in 2022).

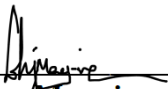
Other reasons for refusal are given below and conditions for significant amendments are proposed in Appendix 1.


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

- (1) The proposed development, containing 8 no. 3-bed units out of a proposed total of 310 units, would be a material contravention of specific Local Area Plan objectives (Objective RE2 and RE5), and a specific objective of the County Development Plan (Policy H1 Objective 12, as supplemented by section 12.6.1). 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 10-12 storeys to the north and east of the development, are not in keeping with the Tallaght Town Centre Local Area Plan 2020 – 2026, nor 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 on Urban Development and Building Height’ (2019). The excessive plot ratio would be 35% higher than envisaged in the Plan. Taken together, these density measures indicate that the proposed development would, in addition to being contrary to the restrictions in the LAP, also be contrary to the design approach of the LAP.

  
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**Colm Maguire,**  
**Executive Planner**

  
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**Eoin Burke, Senior Planner**

**Date:** 03/08/22

  
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**Mick Mulhern,**  
**Director of Land Use, Planning and Transportation**



## 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>
1a	<p>Build-To-Rent Agreement.</p> <p>(a) Prior to the commencement of development, the developer shall agree details of a proposed covenant or legal agreement which confirms that the development shall remain owned and operated by an institutional entity for a minimum period of not less than 15 years and where no individual residential units shall be sold separately for that period. The period of fifteen years shall be from the date of occupation of the first residential unit within the scheme, or the first residential unit within each block, if the development is being divided into parts for the purpose of sale to institutional entities.</p> <p>(b) Prior to the expiration of 15 years, the developer shall submit ownership details and management structures for BTR development, the latter being for the agreement of the Planning Authority</p>	<p>In the interests of proper planning and sustainable development.</p>

<p>2</p>	<p><b>Modifications to the Development</b>  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 by way of the omission of all development taller than 8 storeys.</p> <p>(b) Commercial units along Blessington Road to be subdivisible in order to achieve a fine urban grain and to allow for potential separate sale and/or lease of those units and sub-units. Commercial units to the north of the site should be presented in design terms and be functionally capable of being subdivided into smaller units for separate lease or sale.</p> <p>(c) redesign of the tertiary route to provide a shared pedestrian/cycle space with provision for emergency access by fire tenders, and relocation of other vehicular set-down / parking areas to lay-bys off Belgard Road or Belgard Square East.</p> <p>(d) The internal configuration of units to be altered and agreed in order to provide that 30% of the residential units are 3-bedroom units.</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>3</p>	<p><b>Roads Layout Details</b></p> <p>(a) Prior to commencement of development, the applicant or developer shall agree in writing with the Planning Authority and the National Transport Authority to works to remove the left slip lane from Belgard Road to Blessington Road, and to adhere to the Bus Connects final layouts, and that junction radii and materials adhere to DMURS guidance, 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 on the westward section of Blessington Road, between the junction with Belgard Square East and the junction with Belgard Road and on the northbound section of Belgard 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>	<p>In the interests of local amenity and for the promotion of and transition to active travel modes.</p>

4	<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>	<p>In the interest of public health and to ensure adequate water/wastewater facilities.</p>
5	<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>	<p>In the interests of visual amenity and lifelong maintenance of the development.</p>
6	<p>Revised Landscape Plan</p> <p>Prior to the commencement of Development detailed landscape drawings that illustrate hard and soft landscaping, useable communal open space, meaningful public open space, quality audit and way finding shall be submitted for the approval of the Planning Authority. The proposed public open space areas within the development shall be usable space, accessible and overlooked to provide a degree of natural supervision. Details of play equipment, street furniture including public lighting and boundary treatments should be submitted and agreed with the Public Realm Section. In addition, the applicant shall provide the following additional information:</p> <ol style="list-style-type: none"> <li>i. The applicant shall submit a comprehensive Landscape Design Rationale, the objective of this report is to describe the proposed landscape and external works as part of this proposed SHD development.</li> <li>ii. The developer shall submit level details for the open space, this shall include cross section drawings where applicable. If retaining walls are required, they shall be located outside the open space.</li> <li>iii. The applicant is requested to submit a detailed Play Rationale and Layout Plan (separate to, but related to the Landscape Masterplan), using natural and nature-based solutions, to provide informal, impromptu and spontaneous play opportunities, along with <i>play equipment</i> that provides appropriate challenges for multiple age groups.</li> <li>iv. Details of tree planting pits to include SUDs measures in urban tree pits and use of urban tree soil to be submitted to the Public Realm Section of SDCC for agreement.</li> <li>v. Levels should be provided on all proposed landscape plans</li> <li>vi. 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</li> </ol>	<p>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 2022 - 2028.</p>

	<p>found on the Biodiversity Ireland, All Ireland Pollinator Website.</p> <p>vii. A landscape Specification for all materials, workmanship and landscape maintenance (18 months minimum period post practical completion)</p> <p>viii. 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</p> <p>ix. Trees shall be a mixture of 18-20cm, 20-25cm and 30-35cm girth to create a mature setting for the development.</p> <p>x. 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.</p> <p>xi. 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.</p>	
7	<p><b>Pedestrian Access to Public Spaces</b></p> <p>(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.</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><b>REASON:</b> In the interest of social inclusion and to secure the integrity of the proposed development including open spaces</p>
8	<p><b>Appointment of Landscape Architect</b></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</p>	<p></p>

	<p>accordance with the permitted landscape proposals. If attenuation tree pits are proposed, their installation shall be supervised by the project landscape architect.</p>	
9	<p><b>Children's Play</b>  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>
10	<p><b>Arboricultural Method Statement.</b>  The applicant shall submit a detailed Arboricultural Method Statement (AMS). The AMS shall include justification and mitigation for any tree removal proposed and details of how trees will be protected at all stages of the development. Recommendations for tree surgery works and details of any tree surgery works necessary to implement the permission will be required as will the method and location of tree protection measures, the phasing of protection methods where demolition or construction activities are essential within root protection areas and design solutions for all problems encountered that could adversely impact trees (e.g. hand digging or thrust-boring trenches, porous hard surfaces, use of geotextiles, location of site compounds, office, parking, site access, storage etc.). All works shall be carried out in accordance with the agreed AMS.</p>	<p>To ensure that the trees on site are adequately protected, to safeguard the character and appearance of the area, in accordance with the CDP 2022.</p>

11	<p>Prior to the commencement of any permitted development or any related construction activity or tree felling on the site, the applicant shall lodge a Tree and Hedgerow Bond to the value of <b>€18,099.99</b> with the Planning Authority. This is to ensure the protection of trees on and immediately adjacent to the site to make good any damage caused during the construction period.</p> <p>The bond lodgement shall be coupled with an Arboricultural Agreement, with the developer, empowering the planning authority to apply such security, or part thereof, to the satisfactory protection of any tree/hedgerow or trees/hedgerows on or immediately adjoining the site, or the appropriate and reasonable replacement of any such trees/hedgerows which die, are removed or become seriously damaged or diseased within a period of three years from the substantial completion of the development. Any replacement planting shall use large semi-mature tree size(s) and species or similar as may be stipulated by the planning authority.</p> <p>An Arboricultural Assessment Report and Certificate is to be signed off by a qualified Arborist after the period of 3 years of completion of the works. Any remedial tree surgery, tree felling works recommended in that Report and Certificate shall be undertaken by the developer, under the supervision of the Arborist.</p> <p>For the tree bond to be released, a post construction report on the condition of the trees &amp; hedgerows to be retained shall be undertaken by the project Arborist and all recommendations made within this report shall be carried out. On completion of this, the report and a Certificate of Effective Completion sign by the project Arborist shall be provided to the Planning Authority.</p>	<p>To ensure that the trees on site are adequately protected, to safeguard the character and appearance of the area.</p>
11a	<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"> <li>• Demonstrate the treatment train, biodiversity value and amenity value of the SUDS proposals for the catchment in the residential areas.</li> <li>• 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.</li> <li>• 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.</li> <li>• Natural SUDS measures should be detailed to remove/ reduce the</li> </ul>	<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>

	<p>requirement for underground attenuation tanks in line with the development plan objectives.</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>	
12	<p><b>Green Roofs</b> 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"> <li>SUDS,</li> <li>the creation of appropriate and biodiversity</li> </ol> <p>The details to be submitted shall comprise:</p> <ol style="list-style-type: none"> <li>identification of the roof areas to be used for the provision of green roofs;</li> <li>details of the planting to be used; and</li> <li>details of the maintenance including irrigation.</li> </ol> <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.</p>
13	<p><b>Rooftop Gardens</b> 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> <ol style="list-style-type: none"> <li>A revised layout for each of the roof terraces which contributes to privacy for neighbouring occupiers and comfort for users of the roof terraces.</li> <li>Hard and soft landscaping details.</li> <li>Details of measures to address noise levels and wind microclimate.</li> <li>Details of how inclusive access to and within communal rooftop gardens is achieved.</li> <li>Details of proposed safety railings</li> </ol>	<p>To ensure that the development achieves safe, comfortable and attractive amenity spaces.</p>
14	<p><b>Biodiversity Enhancement</b> Prior to the commencement of Development detailed proposals for biodiversity enhancement across the site to be submitted and agreed with the Local Planning Authority.</p>	<p><b>REASON:</b> To ensure that the development makes appropriate provision for the protection, enhancement, creation and management of biodiversity.</p>

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>	<p>REASON: To provide for the satisfactory future maintenance of this development in the interest of visual amenity.</p>
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>	<p>To promote sustainable travel and to ensure the development is sustainable.</p>
17	<p>Roads</p> <p>(a) The applicant shall obtain the written agreement of Cycle South Dublin 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.</p> <p>(c) Refuse collection from this development shall not be from the public realm.</p> <p>(d) The applicant shall obtain the written agreement of SDCC to further detailed design of all proposed vehicular accesses.</p> <p>Note: The applicant should liaise with the Active Travel Team to ensure appropriate cycle connections are made to existing and planned cycle routes adjoining the proposed development.</p>	<p>To ensure the safe and proper functioning of the scheme.</p>
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>REASON: 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><b>Public Lighting Scheme</b>  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>	To ensure scheme is safely and adequately lit.
20	<p><b>Taking in Charge</b>  (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 prefers 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: <a href="https://www.sdcc.ie/en/services/planning/commencement-and-completion/completion/taking-in-charge-policy-standards/">https://www.sdcc.ie/en/services/planning/commencement-and-completion/completion/taking-in-charge-policy-standards/</a>.</p>	To ensure the scheme can be taken in charge.
21	<p>(a) <b>Drainage – Surface Water</b>  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.  There shall be complete separation of the foul and surface water drainage systems, 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 drainage works for this development shall comply fully with the Greater Dublin Regional Code of Practice for Drainage Works.</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.
22	<p><b>Under-ground Public Services</b>  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>	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.
23	<p><b>Occupancy and Services</b>  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>	In the interest of the proper planning and sustainable development of the area.

24	<p>(a) Street Naming and Dwelling Numbering.</p> <p>Prior to the commencement of any works on site the applicant, owner or developer shall submit the following for the written agreement of the Planning 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:</p> <p>Avoid any duplication within the county of existing names, and Reflect the local and historical context of the approved development, and</p> <p>Comply with;</p> <p>Development Plan policy, and</p> <p>The guidelines on naming and numbering of the Department of Environment, Heritage and Local Government, and</p> <p>Have regard to the Guidelines issued by the Place Names Commission (An Coimisiún Logainmneacha) and</p> <p>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</p> <p>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</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>	<p>To ensure aviation safety and that the construction does not interrupt operations at airfields or helipads in the vicinity.</p>
26	<p>(i) 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</p>	<p>To promote social integration consistent with policies/objectives of the Councils Housing Strategy as contained in the South Dublin County Council Development Plan</p>

	<p>subsection (3) of section 96, and 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>	2016-2022.
28	<p><b>Minimise air blown dust</b>  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.
29	<p><b>Construction Noise</b>  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.</p>	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>(a) 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 &amp; 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>

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**Financial Contribution.**

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).

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.

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.

## APPENDIX 2: PUBLIC REALM REPORT

### SOUTH DUBLIN COUNTY COUNCIL



#### INTERNAL MEMORANDUM

##### Public Realm Planning Report

#### Development:

Mixed-use development including 310 “Build-to-Rent” residential apartments, a creche and a number of commercial units (c. 2,289 sqm) on a c. 1.26 ha site; Consisting of the demolition of existing boundary wall and construction of: c. 2,289 sqm of retail/commercial floor space across 10 units including retail, restaurant/café and Class 2 financial/professional services and office use, and a crèche (257sqm) at ground and first floor levels; 310 build to rent residential apartments including 99 one bedroom units, 203 two bedroom units and 8 three bedroom units within a part 6 to part 12 storey development across 3 blocks over partial basement; c. 2,223 sqm of communal external amenity space provided in the form of a ground floor garden and external terraces at fifth, sixth, seventh and eighth floor levels; c. 1,026 sqm of public open space provided in the form of a central courtyard with landscaped areas at site perimeters; c. 1,785 sqm of resident support facilities and services and amenities provided at basement, ground and first floor levels; Vehicular access to the basement development from a new access point at Belgard Square East; A new tertiary route provided in the southern part of the site linking Belgard Square East and Belgard Road; Provision of 130 car parking spaces (including 8 club car spaces and 6 disabled access spaces) at basement level in addition to 5 set down spaces (4 serving creche) and 1 disabled access space at ground level, layby on Belgard Square East, 6 motorcycle spaces and a total of 763 bicycle parking spaces; Provision of 4 Ø0.3m microwave link dishes to be mounted on 2 steel support pole affixed to lift shaft overrun, all enclosed in radio friendly GRP shrouds, together with associated equipment at roof level at Block B; Provision of 3 ESB substations with switch rooms and plant rooms at basement level, hard and soft landscaped areas, bin and bicycle stores, public lighting, attenuation, green roof, plant at roof level, service connections and all ancillary site development works. The application contains a statement setting out how

the proposal will be consistent with the objectives of the relevant development plan and 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:** Lands at Belgard East, Belgard Road and Blessington Road, Tallaght, Dublin 24

**Applicant:** Ravensbrook Ltd

**Reg. Ref:** SHD3ABP-313760-22

**Report Date:** 22/07/2022

**Planning Officer:** Colm Maguire

**Main Concerns:**

- Additional information/detail required in relation proposed play items contained within the landscape proposals. There seems to be insufficient play items proposed within the overall development.
- Lack of natural SUDS features provided, SUDS features proposed primarily consist of green roofs, local tree pits and rain gardens - details of tree pits incorporating SUDS required - Additional natural SUDS features should be incorporated into the proposed drainage system for the development such as permeable surfacing, constructed tree pits and rain gardens etc.
- Potential effect on amenity due to overshadowing and wind tunneling effect created by the tall buildings (6-12 storeys)

-

**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.

##### **Development Description:**

The development will consist of the redevelopment of an existing brownfield site (c. 0.9ha) and the construction of a mixed use development comprising 326 no. build to rent residential apartments including 110 no. one bedroom units and 216 no. 2 bedroom units, 1,702 sqm of commercial space is provided at the ground floor over 5 commercial units, including a creche, all within a part 6 to part 12 no. storey building over basement. 2,337 sqm of external amenity space provided in the form of a ground floor garden and external terraces at sixth, seventh, eighth and tenth floor levels, 1306sqm of public open space provided in the form of a central courtyard and adjacent to the perimeter of the site, 1553 sqm of internal resident support facilities and amenity space provided at basement, ground and first floor levels.

##### **Zoning:**

The subject site is zoned as *“Town Centre - To protect, improve and provide for the future development of Town Centres”* under both the Development Plan and LAP.

**Density:**

342.1 units per hectare

**Total Site Area:**

c. 0.9ha/9063.0m<sup>2</sup>

**Proposed Public Open Space Provision**

1,026sqm (11.3%) of public open space is provided - public open space provided in the form of a central courtyard and adjacent to the perimeter of the site.

**Communal Open Space**

2,223sqm of communal open space provided; 452m<sup>2</sup> at ground floor and 1771m<sup>2</sup> comprising roof terraces.

**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.

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

- *It is an objective of the LAP to provide new areas of public space and to upgrade existing parks so they provide highly amenable spaces for existing and future residents **(Objective CC 4)**.*
- *It is an objective of the LAP to ensure access to all areas of public space and institutional lands is maximised, and major spaces are linked via amenable pedestrian routes. **(Objective CC 5)**.*

The LAP includes a provision for tree lined streets along Belgard Road and Belgard Square East, with amenity frontage in the northeast corner of the site as set out in Figure 2.10: Public Realm

### **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).
- In addition:
- It is an objective of the LAP to enhance existing green infrastructure and facilitate the development of new green infrastructure corridors within and connecting to lands adjoining the Plan (**Objective CC 2**).
  - Figure 2.11 of the LAP includes the provision of ‘new/improved local green corridor’ along Belgard Road, Belgard Square East and Blessington Road.

### **Relevant Open Space Objectives in the Draft South Dublin County Development Plan 2022 – 2028**

#### **include:**

The draft Plan seeks to ensure sufficient, high quality, usable open space is provided with recreational potential and passive uses, as well as seating and children’s play spaces. Passive surveillance is critical in addition to the incorporation of SuDS and biodiversity.

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

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

**H8 Objective 3:** *To enhance the recreational value of open spaces that serve existing residential areas as part of any future infill developments or where appropriate provide for the upgrade of other parks in the immediate area (applying the 10-minute concept) through a financial contribution in lieu, where a proposed development is not capable of providing the full open space standards on site.*

**COS5 Objective 4:** *To require the provision of public open space as part of a proposed development site area in accordance with the Public Open Space Standards (minimum) set out in Table 8.2. The Council has the discretion for the remaining open space requirement to achieve the overall standard of 2.4 ha per 1,000 population, to allow for the provision or upgrading of small parks, local parks and neighbourhood parks outside the development site area, subject to the open space or facilities meeting the open space ‘accessibility from homes’ standards for each public open space type set out in Table 8.1. In exceptional circumstances where the provision or upgrade of small parks, local parks and neighbourhood parks is not achievable, the Council has the discretion for the remaining open space requirement to allow provision or upgrade of Regional Parks, to achieve the overall standard of 2.4 ha*

*per 1,000 population, subject to the Regional Park meeting the open space 'accessibility from homes' standard set out in Table 8.1.*

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

***COS5 Objective 8:*** *To ensure the design of parks and public open space areas is of high quality; to provide a pleasant setting, accommodate use by people of all ages and abilities, to support life-long activity and good health and well-being by the provision of a balanced mix of active and passive recreation and access to, or view of, nature, ensuring that the design considers: provision of an appropriate mix of hard and soft surfaced areas; enhancement of biodiversity and existing trees and hedgerows; incorporation of water courses, other natural features and existing built heritage into the design of parks and open spaces as appropriate; provision of new planting, landscape features and appropriate site furniture including a variety of accessible, well located and designed seating.*

***COS5 Objective 9:*** *To ensure that parks and public open space are appropriately located within the County and within development sites, to facilitate and support its multifunctional role.*

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

***COS5 Objective 11:*** *To promote the role of parks and open spaces in conserving and restoring biodiversity and ecosystems in accordance with the objectives of the National Biodiversity Action Plan (2017-2021) and the All-Ireland Pollinator Plan 2021- 2025, the Council's Biodiversity Action Plan 2020-2026 or any superseding plans. In the development of individual management plans for parks the requirements of the aforementioned biodiversity and pollinator plans will be taken into consideration and will form a part of the management requirements for the park. The development of individual management plans for parks will include consultation with local stakeholders.*

***COS5 Objective 12:*** *To ensure that proposed SuDS measures are only accepted as an element of public open space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and biodiversity value.*

***COS5 Objective 13:*** *To ensure that parks and open spaces provide for a wide range of recreational and amenity activities that are easily accessible to all in the community, irrespective of age or ability.*

***COS5 Objective 15:*** *To support the development of passive recreation within open spaces, such as walking trails, seating provision and areas which provide for passive amenity/ hobbies, and visual interest.*

**COS5 Objective 16:** *To ensure that parks and public open spaces are carefully designed as safe spaces, by implementing the following measures: Providing active frontages and maximising passive surveillance from adjacent housing and/or public thoroughfares; Eliminating buildings which back-on or gable-front public open spaces; à Designing corner units with active frontage; Encouraging increased use through improved access and quality of facilities'; and Careful location, design and choice of surface materials and site furniture.*

**COS5 Objective 17:** *To ensure that incidental areas of open space which do not function as useable open space and/or are not clearly visible from the public realm, are designed out of a proposed scheme.*

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

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

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

### **Public Realm Comments:**

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

#### **1. Proposed Landscaping Strategy**

The landscape design for the scheme aims to create a sense of connectivity between spaces and promotes a sense of place and well-being within the mixed use residential development. A pocket courtyard park on the ground floor and roof terrace gardens have been provided as part of the landscape strategy. The landscape proposals have included an open space for natural play and some elements of passive and active recreation. In respect of public open space, the proposal includes a total of 1,026 sqm of landscaped open space at ground level focused on the central courtyard. The public realm section welcomes the fact that the central open space/courtyard will be open to the public, will include lawn areas, seating, planting and play areas and as such is considered meaningful public open space.

The public realm section would however have some concerns regarding the functionality and usability of the public open space provided. There are some concerns regarding the potential effect on amenity due to overshadowing and wind tunnelling effect created by the tall buildings (6 to 12 storeys). In addition, the proposed pedestrian route through the development to the south of the courtyard lacks animation and tree planting and is dominated by hard landscaping. Revised proposals and additional design details to be provided by the applicant in this regard. Response should include significant additional trees in order to both soften and animate the Public Realm thereby improving its amenity to both residents and visitors alike. Other additional improvement to this public space/pedestrian route could include:

- improving street lighting
- adding street furniture such as seating, bins and hanging basket stands
- providing public art which reflects the history and personality of the area
- additional planting such as pollinator friendly shrubs and bulbs/flowers
- providing facilities such as multi-use games areas or play parks

-

## **2. Public Open Space Provision**

Public Open Space provision (1026m<sup>2</sup>) is primarily being provided in the form of a central courtyard and small green/open space areas north, west and east along the perimeter of the development.

Within the subject site the open space provision is in excess of the required 10% standard however the public realm section would have concerns regarding the functionality and usability of the public open space provided. There are also concerns regarding the potential effect on amenity due to overshadowing and wind tunnelling effect created by the tall buildings

Public Open Space provided within a residential development should 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 provided within new residential developments should be genuinely accessible to the general public. Public open space is open space which contributes to the public domain and is accessible to the public for the purposes of active and passive recreation, including relaxation and children's play. All public open spaces shall be of a high quality in terms of design and layout, be located in such a manner as to ensure informal supervision by residents and be visually and functionally accessible to the maximum number of residential units. The design intent by the applicant is to create a sense of connectivity between spaces and promotes a sense of place and well-being within this mixed use residential development.

The applicant shall provide clarification in relation to the following issues:



- i. The landscape strategy has made little provision for informal recreation within the proposed design proposals. Revised proposals to be provided by the applicant in this regard. Response should include revised layout and drawings.
- ii. The applicant has not provided details as to the levels and gradients within the proposed public open space areas. In addition, the applicant has not provided any cross sections/elevations through the landscape proposals. The developer shall submit level details for the open space, this shall include cross section drawings where applicable.

## **2. Communal open space**

Communal Space (c. 2,223 sqm) within the proposed residential development is provided across ground floor level and various roof terraces at sixth, seventh and tenth storey levels. 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

The proposed Communal Open Space provision within the development is in principle acceptable to the Public Realm Section however the Public Realm Section would have some concerns regarding the usability, functionality, and amenity value of a number of the communal terraces. The adjoining 6 to 12 story apartment blocks could result in detrimental microclimatic effects including overshadowing and wind tunneling within the podium courtyards thereby considerably reducing the amenity value of these proposed areas. 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. Due to the exposed nature of the site the Public Realm Section would have concerns in relation to the amenity value of the roof the terraces unless measures are put

in place in order to reduce the exposure to the wind and to make the proposed terraces more usable and comfortable to residents and users of these terraces. Response should include revised layout and drawings were required.

## **2. Proposed Roof Terraces**

- Communal roof terraces are provided at sixth storey level at Block C, seventh storey level at Blocks A and B and tenth storey level at Block A. Roof terraces include community gardens, lawns and seating areas, as well as informal play areas. roof terraces across each of the blocks, only accessible to residents.

The applicant has stated in their submission that the roof terraces at sixth, seventh and tenth storey levels across Block C, A and B respectively, contribute positively to the range and quality of communal residential amenity within the scheme and include a mix of recreational activities and planting. The Public Realm Section would have concerns regarding the usability, functionality amenity value and enjoyment of these areas by residents considering the exposed nature of the site and that fact that they are located at sixth, seventh and tenth storey levels across Block C, A and B and and the impacts of wind on amenity and the usability of these spaces at these heights. The Public Realm Section welcomes the fact that the remainder of the roofs are provided as green roofs, planted with sedum/wildflower which will contribute to water retention and biodiversity enhancements.

-

## **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.

The applicant has stated in their submission that the proposed development provides planting and green infrastructure in the form of landscaped edges including native species planting and a range of soft landscaping throughout public open spaces and communal roof terraces and that this will greatly enhances the biodiversity at the site in comparison to its current condition, with landscaping features integrating water attenuation systems and green roofs used throughout.

In addition to the above, the applicant is requested to provide a detailed SuDS strategy 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.

The SuDS features proposed within the development include:

- Permeable Pavement
- Extensive Green Roofs;
- Rain Garden
- Engineered Tree Pits

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

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

Revised proposals to be provided by the applicant in this regard. Response should include revised layout and drawings.

#### **4. Planting Proposals**

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

for the entire development.

## **5. Play**

The Public Realm Section welcomes the provision of a play area within the central courtyard. 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 detailed Play Rationale and Layout Plan (separate to, but related to the Landscape Masterplan), using natural and nature-based solutions, to provide informal, impromptu and spontaneous play opportunities, along with *play equipment* that provides appropriate challenges for multiple age groups. The Layout Plan shall comprise the following:-

- showing types of play and play area(s),
- target age groups,
- landform (included levels and contours) and boundaries,
- design and construction details of play opportunities and facilities in respect of landform, planting, boundaries, equipment and safety surface.

All play equipment and ancillaries shall conform to European Standards EN 1176-1-11 and EN 1177 Playground equipment and surfacing, and to BS/EN standards 2017/18 for Playground Installations for HIC (Head Injury Criterion) and CFH (Critical Fall Height)

## **6. Arboricultural Impact**

As per the submitted Arboricultural Report and associated Tree Survey, Arboricultural Impact Assessment & Arboricultural Method Statement prepared by Charles McCorkell Arboricultural Consultancy - to facilitate the proposed development, 23 trees, three groups of trees, and two hedgerows are required to be removed. Of the 28 survey entries proposed to be removed, three trees are of moderate quality and value (B Category), 24 trees and groups are of low quality and value (C Category), and one tree is of poor quality (U Category). The applicant is proposing to remove 6 no. street trees to accommodate the proposed development works. The street trees proposed to be removed are of high public amenity value due to their prominent location and their loss will have an initial visual impact on the local surrounding area. Prior to the commencement of works, a meeting between the arboricultural consultant, applicant/site manager, and the Public Realm Section will be held in order to discuss the proposed removal of trees within the ownership of South Dublin County Council, the tree protection measures to be put in place and proposed works required in close proximity to existing street trees to be retained.

## **7. Tree Protection Measures**

All trees to be retained must be protected during from any proposed development works by using robust fencing measures which comply with the recommendations outlined within BS 5837:2012. The location and specification of tree protection measures are highlighted on the Tree Protection Plan Appendix B. Protective fencing must be constructed and installed using the BS5837:2012 fencing specification as detailed on the Tree Protection Plans at Appendix B. All tree protection measures and recommendations highlighted in the submitted arboricultural report shall be implemented in full by the applicant and in accordance with best practice BS5837:2012.

**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. Landscape Design Proposals**

Prior to the commencement of Development detailed landscape drawings that illustrate hard and soft landscaping, useable communal open space, meaningful public open space, quality audit and way finding shall be submitted for the approval of the Planning Authority. The proposed public open space areas within the development shall be usable space, accessible and overlooked to provide a degree of natural supervision. Details of play equipment, street furniture including public lighting and boundary treatments should be submitted and agreed with the Public Realm Section. In addition, the applicant shall provide the following additional information:

- xii. The applicant shall submit a comprehensive Landscape Design Rationale, the objective of this report is to describe the proposed landscape and external works as part of this proposed SHD development.
- xiii. The developer shall submit level details for the open space, this shall include cross section drawings where applicable. If retaining walls are required, they shall be located outside the open space.
- xiv. The applicant is requested to submit a detailed Play Rationale and Layout Plan (separate to, but related to the Landscape Masterplan), using natural and nature-based solutions, to provide informal, impromptu and spontaneous play opportunities, along with *play equipment* that provides appropriate challenges for multiple age groups.
- xv. Details of tree planting pits to include SUDs measures in urban tree pits and use of urban tree soil to be submitted to the Public Realm Section of SDCC for agreement.
- xvi. Levels should be provided on all proposed landscape plans

- xvii. 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.
- xviii. A landscape Specification for all materials, workmanship and landscape maintenance (18 months minimum period post practical completion)
- xix. 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
- xx. Trees shall be a mixture of 18-20cm, 20-25cm and 30-35cm girth to create a mature setting for the development.
- xxi. 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 assimilate the development into its surroundings, in accordance with the policies and objectives contained within Section 8.3.0 Public Open Space Hierarchy and Landscape Setting and policies HCL7 Objective 1 and HCL7 Objective 2 of the CDP 2016-2022.**

## **2. 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. Arboricultural Method Statement**

The applicant shall submit a detailed Arboricultural Method Statement (AMS). The AMS shall include justification and mitigation for any tree removal proposed and details of how trees will be protected at all stages of the development. Recommendations for tree surgery works and details of any tree surgery works necessary to implement the permission will be required as will the method and location of tree protection measures, the phasing of protection methods where demolition or construction activities are essential within root protection areas and design solutions for all problems encountered that could adversely impact trees (e.g. hand digging or thrust-boring trenches, porous hard surfaces, use of geotextiles, location of site compounds, office, parking, site access, storage etc.). All works shall be carried out in accordance with the agreed AMS.

**REASON: To ensure that the trees on site are adequately protected, to safeguard the character and appearance of the area, in accordance with policy G2 Objective 9, G4 Objective 5, G2 Objective 13, G6 Objective 1, HCL15 Objective 3 of the CDP 2016-2022.**

#### **6. Tree Bond and Arboricultural Agreement**

Prior to the commencement of any permitted development or any related construction activity or tree felling on the site, the applicant shall lodge a Tree and Hedgerow Bond to the value of **€18,099.99** with the Planning Authority. This is to ensure the protection of trees on and immediately adjacent to the site to make good any damage caused during the construction period.

The bond lodgement shall be coupled with *an Arboricultural Agreement*, with the developer, empowering the planning authority to apply such security, or part thereof, to the satisfactory protection of any tree/hedgerow or trees/hedgerows on or immediately adjoining the site, or the appropriate and reasonable replacement of any such trees/hedgerows which die, are removed or become seriously damaged or diseased within a period of three years from the substantial completion of the development. Any replacement planting shall use large semi-mature tree size(s) and species or similar as may be stipulated by the planning authority.

*An Arboricultural Assessment Report and Certificate* is to be signed off by a qualified Arborist after the period of 3 years of completion of the works. Any remedial tree surgery, tree felling works recommended in that Report and Certificate shall be undertaken by the developer, under the supervision of the Arborist.

For the tree bond to be released, a post construction report on the condition of the trees & hedgerows to be retained shall be undertaken by the project Arborist and all recommendations made within this report shall be carried out. On completion of this, the report and a Certificate of Effective Completion sign by the project Arborist shall be provided to the Planning Authority.

**REASON: To ensure that the trees on site are adequately protected, to safeguard the character and appearance of the area, in accordance with policies G2 Objective 9, G4 Objective 5, G2 Objective 13, G6 Objective 1, HCL15 Objective 3 of the CDP 2016-2022.**

#### **7. 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.
- 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**

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#### **8. Rooftop Terraces**

Prior to the commencement of Development, details regarding the provision of the proposed roof top terraces within the development 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**

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#### **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**

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#### **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.**

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**Prepared By: Oisín Egan**  
**Executive Parks Superintendent**

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**Endorsed By: Laurence Colleran**  
**Senior Executive Parks Superintendent**

### **APPENDIX 3: WATER SERVICES REPORT**

**Register Reference No.:** SHD3ABP-313760-22

**Development:** 1,702sq.m of commercial floor area including, café/restaurant, commercial and retail uses and a 266sq.m creche; 326 build to rent residential apartments including 110 one bedroom units and 216 two bedroom units, within a part 6 to part 12 storey building over partial basement; 2337sq.m of external amenity space provided in the form of a ground floor garden and external terraces at sixth, seventh, eighth and tenth floor levels, 1306sq.m of public open space provided in the form of a central courtyard and adjacent to the perimeter of the site; 1553sq.m of internal resident support facilities and amenity space provided at basement, ground and first floor levels; Vehicular access to the basement development will be from a new access point from Belgard Square East; A new tertiary access road will be provided at the south of the site; Provision of 149 car parking spaces, 6 motorcycle spaces and 631 bicycle parking spaces, site wide landscaping and all associated services and infrastructure required to facilitate the development; Provision of an ESB substation, switch room and plant room at basement level, hard and soft landscaped areas, public lighting, attenuation, service connections and all ancillary site development works.

**Location:** Belgard Square East, Belgard Road and Blessington Road, Ravensbrook Road, Tallaght, Dublin 24

**Report Date :** 23<sup>rd</sup> June 2022

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#### **Surface Water Report:**

#### **Observations:**

- 1.1 Submit a surface water drawing in plan and cross-sectional view showing
- proposed SuDS (Sustainable Drainage Systems) features. Include the revised surface water layout and proposed attenuation system.

#### **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.

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Signed: \_\_\_\_\_  
Adam Adderley-McCabe GE

Date: \_\_\_\_\_

Endorsed: \_\_\_\_\_  
          Brian Harkin SEE

Date: \_\_\_\_\_

An application for Strategic Housing Development was received by An Bord Pleanála on the 09/06/2022.

**Site:** Lands at Belgard East, Belgard Road and Blessington Road, Tallaght, Dublin 24

**Applicant:** Ravensbrook Limited

**Development:** Mixed-use development including 310 “Build-to-Rent” residential apartments, a creche and a number of commercial units (c. 2,289 sqm) on a c. 1.26 ha site; Consisting of the demolition of existing boundary wall and construction of: c. 2,289 sqm of retail/commercial floor space across 10 units including retail, restaurant/café and Class 2 financial/professional services and office use, and a crèche (257sqm) at ground and first floor levels; 310 build to rent residential apartments including 99 one bedroom units, 203 two bedroom units and 8 three bedroom units within a part 6 to part 12 storey development across 3 blocks over partial basement; c. 2,223 sqm of communal external amenity space provided in the form of a ground floor garden and external terraces at fifth, sixth, seventh and eighth floor levels; c. 1,026 sqm of public open space provided in the form of a central courtyard with landscaped areas at site perimeters; c. 1,785 sqm of resident support facilities and services and amenities provided at basement, ground and first floor levels; Vehicular access to the basement development from a new access point at Belgard Square East; A new tertiary route provided in the southern part of the site linking Belgard Square East and Belgard Road; Provision of 130 car parking spaces (including 8 club car spaces and 6 disabled access spaces) at basement level in addition to 5 set down spaces (4 serving creche) and 1 disabled access space at ground level, layby on Belgard Square East, 6 motorcycle spaces and a total of 763 bicycle parking spaces; Provision of 4 Ø0.3m microwave link dishes to be mounted on 2 steel support pole affixed to lift shaft overrun, all enclosed in radio friendly GRP shrouds, together with associated equipment at roof level at Block B; Provision of 3 ESB substations with switch rooms and plant rooms at basement level, hard and soft landscaped areas, bin and bicycle stores, public lighting, attenuation, green roof, plant at roof level, service connections and all ancillary site development works. The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant development plan and 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://thehavenshd.ie/> which the application details have been uploaded.

Stage 3 reference number: SHD3ABP-313760-22

Stage 2 with ABP in APAS under reference: SHD2ABP-311896-21

Stage 1 with SDCC in APAS under reference: SHD1SPP009/21

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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 Bords opinion stated the following items require further information.

**Additional Information Requested**

*3. Further clarification and elaboration for the documents as they relate to the design and function of the proposed Tertiary Road linking Belgard Road with Belgard Square East. The intent with regard to the taking-in-charge of this road should be clearly stated.*

**Applicant Submitted Response in Additional Information:**

No statement as to the function of the Tertiary Road has been submitted, although from the plan the road will allow emergency vehicles access. The road will also provide access for refuse vehicles to collect waste from inside the development and allow service and delivery vehicles access.

**Additional Information Requested**

*6. A site layout plan, which clearly indicates areas intended to be taken in charge.*

**Applicant Submitted Response in Additional Information:**

The applicant has submitted a plan detailing the areas to be taken in charge by the local authority. The plan identifies small areas around the perimeter of the development to be taken in charge, the total area of these is 507m<sup>2</sup>.

**Additional Information Requested**

*7. Details clearly distinguishing between areas proposed as public open space and those specified as communal open space and identifying which areas it is proposed that the council would take in charge. Where it is not proposed that open space would be taken in charge, details should be submitted as to how such space would be managed including the management of access and use of the space, and who would take responsibility over the long-term for the costs arising from maintenance and the liability for accidents.*

### **Applicant Submitted Response in Additional Information:**

The applicant has submitted a drawing distinguishing between the areas as proposed public space and communal. Although no details of the management of the different spaces will be managed has been supplied.

### **Additional Information Requested**

*9. Drawings clearly identifying all works proposed in the public realm including any modifications to the adjoining road and public footpath networks. The relationship with future works and improvements as part of BusConnects, including modifications and upgrades to junctions, bus stops and footpaths should be clearly described.*

### **Applicant Submitted Response in Additional Information:**

Details of the Bus Connects layout on Blessington Road have been supplied. Road construction details have been submitted. The details of the modifications to the surrounding roads and footpaths have been submitted.

The applicant shall ensure that the northern and eastern boundaries shall integrate with the latest bus connects proposals.

### **Additional Information Requested**

*11. A statement addressing the matters raised in the report of the South Dublin County Council Roads Department, dated 26/11/2021*

### **Applicant Submitted Response in Additional Information:**

No statement has been provided, but the applicant has submitted the details requested by SDCR roads department.

- 1. The proposed network will not adversely affect the capacity of surrounding roads network.*
- 2. The proposed creche car parking and set down area is not an efficient layout. (cul-de-sac) with the required inefficient turning movements. These movements should be moved out to the tertiary through road.*

**The applicant has not altered the layout of the creche parking/set down area. The proposed spaces will be on the opposite side to the creche entrance, resulting in patrons having to walk across the vehicle access. The spaces could be closer to the entrance removing the need for pedestrians to cross the vehicle access.**

- 3. The Tertiary Road needs to be designed such that more set down spaces are provided for the creche. This would provide more efficient car movements.*

**The applicant has provided a separate area for creche set down. Details of autotrack for vehicle access and parking have been provided**



- 4. The proposed development is well connected to public transport links and is close to several key amenities. There is scope to reduce the car parking provision. SDCC recommend that circa 130 no. spaces are provided within the development. The creche spaces at ground floor level can be removed.*

**The proposed development shall have a total of 135no. car parking spaces. Of the 135no. spaces, 130no. spaces shall be allocated at the basement level including 8no. residential car club spaces. A further 5no. spaces shall be located at the surface level including 1no. accessible space. All the car parking spaces (including accessible spaces) shall be controlled by the management company.**

- 5. The basement car parking layout is satisfactory. A total of 10% of the car parking spaces are required to be fully operational electric charging spaces on the first opening of the development. 100% of the spaces must be ducted for future electric charging provision. A total of 5% of the car parking spaces shall be mobility impaired spaces.*
- 6. Further detailed design of all proposed vehicular accesses is required at stage 3.*

**The detailed design of the proposed vehicular access points has not been submitted.**

- 7. The proposed development shall tie in seamlessly with the existing footpaths and public realm. More detail is required at stage 3 and the agreement of the roads department must be attained for this important area.*
- 8. An Autotrack swept path analysis is required to ensure Fire tender and Bin collection access to all required locations.*

**An autotrack has been submitted detailing fire tender access and refuse collection, both are acceptable.**

- 9. A Taking in Charge layout needs to be agreed with SDCC. The items for taking in Charge must be in accordance with Appendix 6 of the Taking in Charge Standards.*

**This has been addressed by the comments above.**

- 10. The applicant should liaise with the Active Travel Team to ensure appropriate cycle connections are made to existing and planned cycle routes adjoining the proposed development.*

**The applicant has not submitted any details of contact with the Active Travel Team within the local Authority. Cyclist permeability through the site is provided by means of the east-west shared tertiary route (linking Belgard Square East to the existing northbound cycle lane on Belgard Road) and a dedicated**

**pedestrian/cyclist link in a north-south direction, linking the proposed tertiary route to Blessington Road**

11. *The applicant must ensure that the proposed development aligns with any NTA Bus connects project.*

**As above**

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

**A road safety audit has been conducted. The report found 19 items that required attention. Three items were not amended as to the report but alternatives have been accepted by the report's designers.**

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

14. *The management of bin collection and servicing needs to be set out clearly.*

**This point has been addressed below.**

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

**A public lighting scheme is required to be agreed with SDCC. This should be by way of condition to the planning.**

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

**Additional Information Requested**

12. *A Parking Management Strategy, including detail on the breakdown of parking provision by type and land use.*

**Applicant Submitted Response in Additional Information:**

The applicant has submitted a parking management strategy, it details that all the car parking spaces (including accessible spaces) shall be controlled by the management company. The report concludes that parking control measures shall be implemented such as improved signage, patrol, clamping, and fining to reduce the undisciplined parking by the residents

### **Additional Information Requested**

*13. A Quality Audit demonstrating compliance with the principles and specifications set out in DMURS and the National Cycle Manual. This should include a Road Safety Audit which considers inter alia the design and layout of the proposed car park and the tertiary access route running between Belgard Square East and Belgard Road.*

### **Applicant Submitted Response in Additional Information:**

The applicant has submitted a DMURS report that concludes that the subject development is designed in accordance with the principles of DMURS. The proposed development considers the needs of pedestrians and cyclists before those of private vehicles.

### **Additional Information Requested**

*14. A Servicing and Operations Management Plan for the proposed commercial and residential uses.*

### **Applicant Submitted Response in Additional Information:**

It is proposed that a waste collection point will be provided at the northern edge of the proposed internal tertiary route, allowing for refuse collection to occur internally within the subject development site. It is proposed that a waste collection point will be provided at the southern edge of the proposed internal tertiary road, allowing for refuse collection to occur internally within the subject development site. 2no. loading bays are proposed within the subject development. 1no. on Belgard Square East and one on the proposed tertiary road within the subject development to facilitate servicing of the proposed commercial/retail units.

### **Additional Information Requested**

*15. Details of the quantum and design of bicycle parking / storage, having regard to the provisions of the guidelines on Sustainable Urban Housing: Design Standards for New Apartments. The allocation of spaces between residential and commercial uses on the site should be clearly described. The design of such parking / storage should consider relevant access and operational requirements.*

### **Applicant Submitted Response in Additional Information:**

The applicant is to provide 763no. bicycle parking spaces of which 529no. shall serve the development residents' long-term provision. 20no. staff bicycle spaces are provided at basement level. 214no. spaces shall serve visitors to the proposed development. Visitor spaces shall be provided at surface level for the use of residential visitors and staff/patrons of the commercial uses proposed within the subject development. 159no. spaces at surface level

are proposed to serve the residential visitors to the proposed development. The remaining 55no. surface level spaces shall serve the visitors of the café, restaurant, retail, and office uses. This provision is above the SDCC development plan standards and in line with the Sustainable Urban Housing: Design Standards for New Apartments.

**SDCC roads department have the following comments:**

- 9. SDCC are aware that the NTA are in the process of finalising the design of the proposed Greenhills to City Centre Core Bus corridor. The applicant shall ensure that the northern and eastern boundaries of the proposed site shall integrate with the latest bus connects proposals for this location.**
- 10. The developer shall deliver a one-way cycle lane along the northern boundary of the development that integrates with the latest Core Bus corridor proposals.**
- 11. The applicant has not satisfactorily addressed the following request: “Further clarification and elaboration for the documents as they relate to the design and function of the proposed Tertiary Road linking Belgard Road with Belgard Square East. The intent with regard to the taking-in-charge of this road should be clearly stated.”**
12. Prior to commencement a developed Construction Demolition and Waste Management Plan shall be agreed by SDCC and lodged on the planning file.
13. Prior to commencement, SDCC will require a public lighting scheme to be agreed with South Dublin County Council Lighting Department.
14. The applicant should liaise with the Active Travel Team to ensure appropriate cycle connections are made to existing and planned cycle routes adjoining the proposed development.
15. Further detailed design of all proposed vehicular accesses is required.
16. The proposed creche car parking and set down area is not an efficient layout.

## **APPENDIX 5: Housing Report**

## **APPENDIX 6: s.247 Notes**