

Planning Report

Transitional Care Facility,
Unit 21,
First Avenue,
Cookstown Industrial Estate,
Dublin 24.

On behalf of



September 2022



Brock
McClure

Planning & Development Consultants

63 York Road,

Dun Laoghaire

Co. Dublin

www.brockmcclure.ie

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1 Executive Summary

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Planning Report on behalf of **Bartra Property Cookstown Limited, Third Floor, Longphort House, Earlsfort Centre, Dublin 2**, for a proposed Transitional Care Facility on lands at **Unit 21 First Avenue, Cookstown Industrial Estate Dublin 24**. For clarity, the site is located within the administrative boundary of South Dublin County Council.

This report is intended to identify consistency with the relevant national planning policy and guidelines issued under Section 28 of the Planning and Development Act (as amended), and with local statutory planning policy in the form of the South Dublin County Development Plan 2022-2028 and Tallaght Town Centre Local Area Plan 2020.

The subject site is opportunely located at the edge of the Cookstown Industrial Estate, proximate to bus and light rail services at Belgard Luas Stop and a short distance from major centres of employment at Tallaght Town Centre, TU Dublin, and Tallaght Hospital.

While the wider area remains a working industrial estate, there are several vacant sites in the vicinity with permitted and proposed planning applications for residential and mixed-use development that indicate a general intention to move away from the traditional uses in the area. These sites, governed by the regeneration (REGEN) zoning, will result in a diversification of land uses in the area, especially as the form of industrial buildings and commercial warehousing is evolving into a mixed-use built environment. As such, the proposal complies with the sequential approach from the Town Centre and adjoining public transport hubs, as outlined in the Tallaght LAP.

The proposed development will consist of a 131 bed Transitional Care Facility. The decision to proceed with a facility as such on the subject site is based on extensive demographic analysis and market demand research conducted by the applicant prior to lodging this application. The locational benefit of the site near Tallaght Hospital means that the site is ideally located to support a Transitional Care Facility.

The proposed Transitional Care Facility will provide essential infrastructure to support an ageing population and is ideally located in a regeneration area, where population is envisioned to increase as the surrounding area is regenerated from its traditional industrial use to new mixed use residential neighborhoods.

2 Introduction

This report is intended to specify the rationale behind the subject proposal; to identify compliance with relevant statutory documentation; and to provide a detailed description of the proposal for the benefit of the Planning Authority.

We wish to highlight from the outset, that our client is committed to working with the Planning Authority to deliver on a proposal that is appropriate to the site and the surrounding transitional context at Cookstown. The Planning Authority is aware of the Applicant's commitment to delivering a quality mixed-use development on the site as evidenced in the planning history for the subject site. This application for a proposed Transitional Care Facility will represent the first step towards realising the overall site potential as a mixed-use development within a regeneration zone. It is noted that this application will be followed by a future application for mixed use residential development on the eastern portion of the site. The applicant has recently requested a s.247 meeting with South Dublin County Council, initiating the LRD process for this subsequent future mixed use residential application on the eastern portion of the site.

We note at this point that the subject site is conveniently located at Unit 21 First Avenue, Cookstown Industrial Estate, Dublin 24, in close proximity to high quality public transport, such as the Belgard Road Luas stop and bus services along the Belgard Road, and close to Tallaght Village Centre and Tallaght Hospital.

2.1 Applicant and Design Team

The Planning Authority is aware of the Applicant's intent to progress development upon receipt of a final grant of permission. Bartra Capital Property (parent company of the Applicant Bartra Property Cookstown Limited) has an extensive property portfolio. The Applicant is fully funded and is committed to the delivery of this Transitional Care Facility development subject to a grant of planning permission.

The Applicant has a proven track record of providing quality facilities for the healthcare sector, providing convalescent, respite, palliative and long-term care in their fully operational facilities at Beaumont, Dublin 5, Northwood, Dublin 9 and Loughshinny in North County Dublin. Clondalkin is scheduled to open in 2022.

Our client has appointed an experienced design team to prepare this planning application. The design team for this application comprises the following:

- Bartra Property Cookstown Limited – Applicant
- Brock McClure - Planning & Development Consultants
- EML – Project Architects
- OCSC– Project Engineers
- AIT– Landscape Architects
- Ciaran Keating – Project Arborist
- AWN – Ecological Consultants
- JVT- Sunlight and Daylight Report/ M&E + Lighting
- Enviroguide – AA and EIAR Screening
- 3D Design Bureau –Visualisations
- RSK – Project Noise Consultant

The various inputs from the design team are referenced where relevant within this report. We confirm that the following reports are included herewith to enable the Planning Authority to make a comprehensive assessment of the scheme:

- Brock McClure Consultants – Full Suite of Planning Reports and Associated Material.
- Bartra – IAA Correspondence, Correspondence with Tallaght Hospital
- EML – Architectural Drawing Pack, Architectural Design Statement
- AIT – Landscape Drawings, Landscape Report, Landscape Visual Impact Assessment.
- OCSC – Engineering Drawing Pack, Outline Construction Management Plan, Outline Construction and Demolition Waste Management Plan, Mobility Management Plan, Engineering Services Report

- AWN – Operational Waste Management Plan.
- Ciaran Keating – Arboricultural Impact Assessment Report, Arborists Drawing Pack
- 3D Design Bureau – CGIs and Verified Views.
- JVT – Sunlight and Daylight Analysis, Public Lighting Drawings and Statement, M&E/ Sustainability Report.
- RSK – Noise/ Acoustic Design Report.
- Enviroguide – AA Screening and EIAR Screening Statement

2.2 Compliance with Planning Regulations

We confirm that prior to lodging this planning application, all relevant drawings were screened by this office with reference to the Planning & Development Regulations, 2001(as amended) and are consistent with the spirit and intent of same.

In accordance with article 22(2) (a) of S. I. No. 685 of 2006, a copy of the newspaper notice and the site notice accompanies this planning application.

In accordance with article 238 of S. I. No. 685 of 2006, this application is accompanied by 6 no. copies of the application.

In accordance with article 22(2)(b) and (d) of S. I. No. 685 of 2006 this planning application is accompanied by 6 no. copies of a location map of sufficient size, prepared by EML Architects and clearly identifies, at a scale of 1:1,000 the lands which are the subject of this application outlined in red.

In accordance with article 22(2)(b) of S. I. No. 685 of 2006 the approximate locations of the Site Notices erected are identified on the Site Location Map.

In accordance with article 19(1)(b) of S. I. No. 685 of 2006 the Site Notices have been printed on indelible ink on a white background.

In accordance with article 22(2)(h) of S. I. No. 685 of 2006 the appropriate fee payable to the Planning Authority with respect to this planning application is calculated in the application form.

In accordance with article 23(1)(a) of S. I. No. 685 of 2006 the lands which are the subject of this application are outlined in red on the enclosed Proposed Site Plan at 1:500 scale by EML Architects.

In accordance with article 23(1)(b) and (d) of S. I. No. 685 of 2006, other plans, elevations and sections are drawn to a scale of not less than 1:200 and show the main features of any buildings contiguous to the proposed structure.

In accordance with article 23(1)(c) of S. I. No. 685 of 2006, the site layout plan and other plans shows the level or contours.

In accordance with article 23(1)(f) of S. I. No. 685 of 2006 plans and drawings of elevations and sections indicate in figures the principal dimensions of any proposed structure.

In accordance with article 23(1)(g) of S. I. No. 685 of 2006 all OS mapping is appropriately identified.

In accordance with article 23(1)(h) of S. I. No. 685 of 2006 the north point is indicated on all relevant maps and plans.

3 Site Location and Context

The subject site is located at Unit 21 First Avenue, Cookstown Industrial Estate, Dublin 24, to the north of Tallaght Town Centre. The vacant site comprises low rise commercial buildings arranged across 1-3 storeys. An aerial view of the site is presented in Figure 1 below.



Figure 1 - Subject Site

The wider industrial estate is undergoing a period of transition. Several industrial/commercial sites are currently vacant or are being redeveloped at present. Existing vacancy levels indicate the general intention to move away from traditional industrial uses as demonstrated in the 'REGEN' zoning for the area.

The site is within walking distance of several employment hubs namely:

- **Tallaght University Hospital** located to the south west of the subject site (c.3,000 no. staff);

One of the primary reasons for the subject site selection are the locational benefits of providing a Transitional Care facility near a major hospital such as Tallaght University Hospital. The step-down nature of the facility allows patients to avail of convalescent and respite services bridging the gap between hospital and home care. This model has been used at Beaumont Lodge, a 221 bedroom facility located c.200m east of Beaumont Hospital.

- **TU Dublin (Tallaght) Campus** formerly Tallaght Institute of Technology to the south east of the site (c.382 no. full-time staff);
- **Tallaght Town Centre** including The Square shopping Centre; and **South Dublin County Council Offices** located further south of the subject site.

The site is located c.450m from the Belgard Luas Stop. Given the proposed tertiary route to the north of the site (as outlined in the LAP and proposed under SHD application ABP Ref. 309731-21), this distance will reduce to c.300m. Vehicular and pedestrian access is provided on First Avenue with 1 no. pedestrian access located on Cookstown Road. The subject site area is approx. 1.6727ha, this is including areas that have been included within the development redline to facilitate necessary interim upgrade works to the surrounding pedestrian and cycle infrastructure and drainage along Cookstown Road and to the North East of the primary development site towards the Belgard Luas Stop.

Tallaght University Hospital is located approximately 500m to the southwest of the site and The Square Shopping Centre Tallaght provides a variety of retail and convenience outlets approximately 1km to the south of the subject site.

There is an offering of commercial leisure, restaurants, and comparison retail within 1 km of the subject site. South Dublin County Council Offices are located approximately 800m to the south of the site.

Figure 2 below illustrates the extensive mix of land uses surrounding the subject site. The immediate sites adjacent to the subject site are primarily commercial and industrial. A large area of open space is located further west of the site.

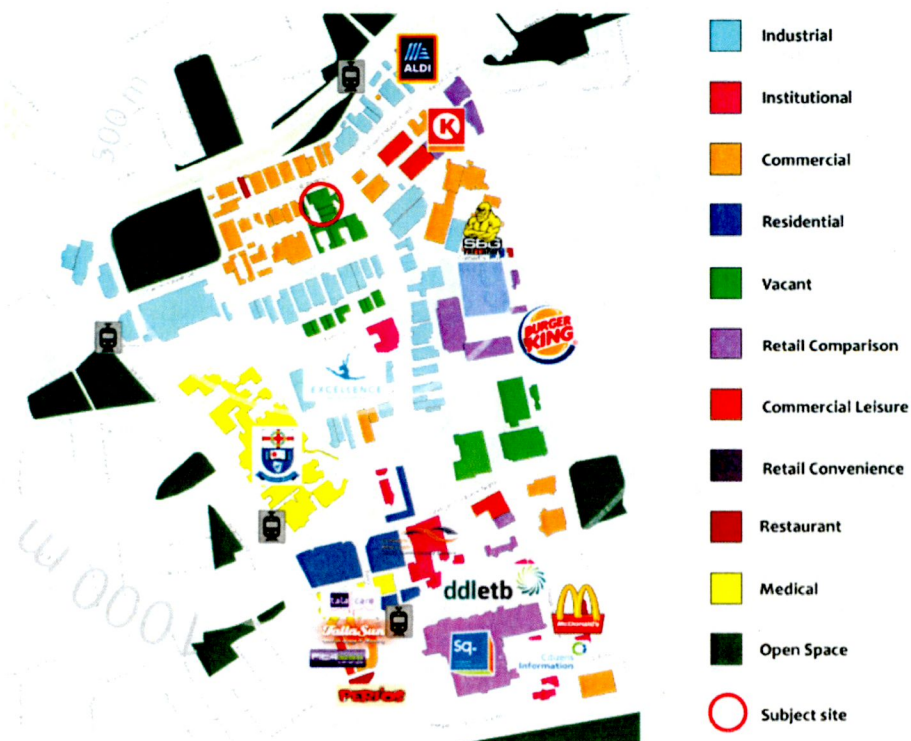


Figure 2 – Existing Land-Uses Surrounding the Site



Figure 3 - Existing Site Entrance and Commercial Building Planning for Demolition

The site is currently occupied by a vacant warehouse/ office facility and cafe. The existing buildings on the site vary in height from single storey structures in the centre, to 2 and 3 storey buildings to the south and east of the site. A surface carpark is located along the northern, western and eastern perimeters of the site. We refer to Figure 2, which illustrates a partially visible view of the existing vacant structures from Cookstown Road.

The site boundary to the east runs adjacent to Cookstown road for approximately 100 metres and is defined by a green steel security fence with a hedgerow behind, largely cutting off the site from the street. There is a concrete footpath with a grass embankment running the length of the site boundary to the east. The existing site access point is located along this boundary and is defined by a concrete wall to each side of a metal security gate.

The boundary to the north runs approximately 90 metres along first avenue and shares similar characteristics as the boundary to the east. The roadside grass embankment along this boundary is replaced by a car parking bay, separated from the footpath by a low metal railing. A second entrance point to the site is located along this boundary in the northeast corner and is characterised by a similar concrete wall and metal gate as seen along the Eastern boundary. This access point to the site is shared with the café operating to the west of the site.

Along the western side of the site the boundary runs approximately 95 metres. It runs alongside existing warehouse buildings 1-2 storey in height being used for light industry as is typical in the area surrounding the site. A security fence and some mature tree lining characterise this site boundary. There is no existing site access from the western boundary.

The site boundary to the south is approximately 130 metres and runs adjacent to existing light industrial warehouse and office buildings typically 1-2 storeys in height. Like the Western boundary of the site the Southern boundary is characterised by an existing security fence and some mature trees and hedgerows. There is no existing site access from the Southern Boundary.

Both roads adjacent to the site (First avenue and Cookstown Road) are regional roads with a single lane of traffic travelling in each direction.

4 Planning History

The following section provides a brief overview of the current planning history for the subject site and surrounding environs.

4.1 Subject Site

SD21A/0196

Application submitted by Bartra Property (Cookstown) Ltd for the demolition of all structures on site and the construction of a 1-5 storey nursing home/ step down facility providing 131 no. bedspaces and 2 no. residential apartment blocks (Block A 8 storey and Block B 5-6 Storey providing 139 no. residential unit's total. The application was refused by South Dublin County Council and subsequently appealed by the applicant to An Bord Pleanála who upheld the decision to refuse permission for the development on the 14th of April 2022.

The refusal reasons listed in the decision to refuse the application by South Dublin County Council were as follows:

- 1. Sequencing and Phasing** - The proposed development substantially diverges from the LAP policy on sequencing and implementation and would be physically isolated if delivered prior to adjoining development and/or enhanced connections to either the town centre or a luas station. The proposed density and corresponding low car parking provision at the site exacerbate this issue and could only be accommodated (a) on a larger site capable of establishing its own character and enclosing a viable mixed-use area (as provided for in the LAP), or (b) in tandem with enhanced connectivity and permeability as provided for in the LAP. The site faces significant constraints for regeneration and redevelopment without permissions being in place on adjoining sites. The applicant may wish to expand the subject lands for the benefit of a future application, or wait until permissions are in place on adjoining lands. This notwithstanding, the proposed residential development of this site alone should only progress in line with LAP standards and without prejudicing development on adjoining sites. In the current context, the proposed development would be isolated development and would provide a poor standard of residential amenity for that reason, and thereby undermine the regeneration priorities as outlined in the zoning objective. The development would materially contravene Section 8.0 and Objective IS1 of the Tallaght Town Centre Local Area Plan 2020 - 2026 and would be a material contravention of that Plan and would also contravene Policy H3 (Housing for Older People) in the South Dublin County Development Plan 2016 - 2022 in that it is not in an established residential and mixed use area and is not at a location proximate to services and amenities.
- 2. Intensity of Development** - The present proposal, stated by the applicant to have a plot ratio of 1.49, represents overdevelopment. This is contrary to specifications of plot ratio in section 3.3 the Tallaght Town Centre Local Area Plan 2020 – 2026, under which a maximum plot ratio of 1 is specified, with flexibility for 20% increase of plot ratio where certain conditions are met. The proposed additional height and plot ratio is not justified under Section 2.6 of the Local Area Plan with reference to the public realm improvements provided on the site, in particular, the dominance of the internal street by car parking and the poor provision for pedestrians. The provision of 8-storey development fronting onto the internal street is inappropriate and would be detrimental to the enjoyment and amenity of that space. As such, the proposed development does not comply with the Building Height Strategy contained in Chapter 2 of the Local Area Plan, and would undermine the regeneration of the area by itself and by the precedent it would set.
- 3. Infrastructure** - (a) The proposed development does not include provision for cyclists on Cookstown Road, a major route through the area, as per the requirements of section 3.3 of the Tallaght Town Centre Local Area Plan 2020 – 2026. (b) The isolated nature of the development is exacerbated by the extremely low provision of car parking. The provision of car parking entirely on the street would lead to dominance of the streetscape by cars, undermining the comfort and safety of pedestrians and not in accordance with DMURS. (c) Childcare facilities are not proposed as part of this development, contrary to the 2001 Childcare Guidelines and contrary to the infrastructure requirements for Cookstown, set down in section 3.3. of the Tallaght Town Centre Local Area Plan 2020 – 2026. This would undermine the residential

amenity of the development and the regeneration of the area, both by itself and by the precedent it would set. (d) Feasibility of the development in terms of water supply and waste water has not been established by Irish Water, having regard to the existing deficiencies in the water supply and wastewater sewerage network in the area and the period within which this constraint may reasonably be expected to cease.

4. **Residential Layout and Amenities** - (a) The sunlight and daylight analysis of the development is not considered to be adequate, and the development would feature poor communal open space to serve Blocks A and B. This would undermine the residential amenity of the development and the regeneration of the area, both by itself and by the precedent it would set. (b) The layout of the development should be improved in order to increase separation distances between apartment units on upper floors, decrease the dominance of surface car parking, and to ensure the internal street is not excessively enclosed by tall buildings. (c) The glazed corner feature to the north-east of the residential block is inappropriate for a residential development in an urban streetscape. (d) Minimum storage provision in the proposed units appears in some cases to have been counted both as storage and as habitable room space, and this should be revised prior to a grant of permission. (e) Overall provision of space in apartments could be improved prior to a grant of permission in order to comply with section 3.8 of the 'Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities' (2020), without relying on the assessment of 2-bed, 3-person units against the lower minimum apartment size of 63sq.m
5. **Public Realm and Water** - Inadequate information has been supplied regarding the provision of natural SUDs, or green infrastructure, in accordance with Chapter 8 of the South Dublin County Development Plan 2016 - 2022. The design of SuDS features is required to be of high quality to achieve a multifunctional space for amenity, biodiversity and surface water management. Additionally, the applicant has not provided information to show compliance with Policy IE2 of the South Dublin County Development Plan 2016 - 2022. The development would, by itself and by the precedent it would create, undermine the sustainable regeneration of the area and the strengthening of green infrastructure.

The reasons listed in the decision to refuse the application from An Bord Pleanála were as follows:

1. The proposed development would in the current context where the environs of the site is generally employment and commercial use, be physically isolated from compatible uses and in the absence of confirmed adequate connections and linkages in terms of pedestrian and cycle routes towards the town centre and to key public transport routes, would constitute a poor standard of residential amenity for prospective occupants and would give rise to residential and commercial uses which are disconnected from public transport and the wider area. In this regard, the proposed development would be in contrary to the provisions of the Tallaght Local Area Plan 2020-2026, specifically section 8 (implementation and sequencing). The proposed development would, therefore be contrary to the proper planning and sustainable development of the area.
2. The proposed development would materially contravene the policies and objectives of the Tallaght Town Centre Local Area Plan 2020-2026 in respect of building height and plot ratio. Having regard to the provisions of this plan., which are considered reasonable, and to the nature, extent, scale and layout of the proposed development, including the 8 storey height of block A along First Avenue and along the internal street within the proposed scheme, the poor provision for pedestrian movement within the site and the dominance of surface car parking, the board is not satisfied that a material contravention of the plan would be justified, and further, that such material contravention of the plan, by itself and by the precedent it would set,, would compromise the coherent redevelopment and regeneration of this site and the wider area in a manner consistent with the overall provisions of the Local Area Plan. The proposed development would, therefore be contrary to the proper planning and sustainable development of the area.
3. On the basis of the information submitted with the application and appeal, the board is not satisfied that the applicant has demonstrated that the proposed development can be accommodated within the existing public wastewater network. In the absence of confirmed evidence within the application and appeal documentation, that the existing network can accommodate wastewater arisings generated

from this specific scheme at this site, or the identification of the nature and scope of any upgrades and works, including the timeframe for implementation of same, which would be necessary to facilitate the connection of the proposed development to the wastewater network, it is considered that the proposed development would be premature. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area

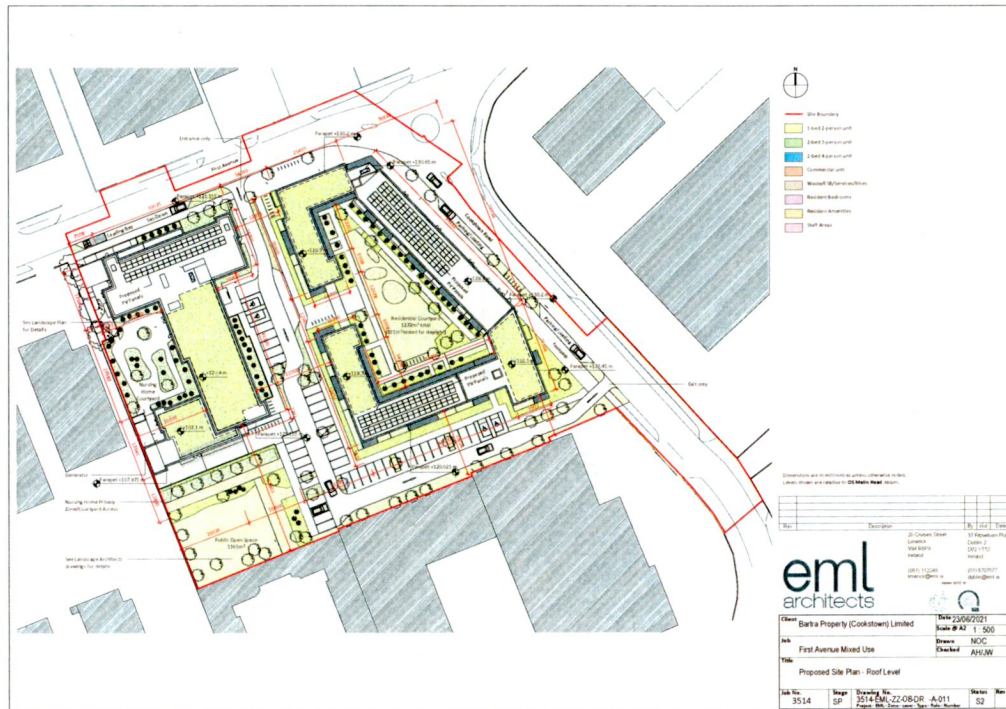


Figure 4 – Site Layout Plan Submitted with SDCC Ref. SD21A/0196

ABP-303911-19

SHD Application submitted by Bartra Property (Cookstown) Ltd. on 12 March 2019 for 150 BTR at and 222 Shared-Living bed spaces at Unit 21, First Avenue, Cookstown, Dublin 24. The application was refused by ABP on 19 June 2019, based on the following reasons for refusal:

1. Having regard to the location of the subject site within the existing Cookstown Industrial Estate, to the established build form, uses and character of the industrial estate surrounding the site, particularly along First Avenue and Cookstown Way, and having regard to the location of the subject site at a remove from the town centre of Tallaght, it is considered that the development of a residential use at this location, in the **absence of an overall strategy for the re-development of the industrial estate**, and in the **absence of the realisation of planned direct vehicular, and convenient cyclist and pedestrian links, to the town centre and to public transportation**, would represent an **uncoordinated and haphazard form of development** which would give rise to an **isolated piecemeal** pocket of residential development that is **disconnected from shops, amenities and/or residential services, contrary to section 11.2.4 of the current South Dublin County Development Plan 2016 – 2022**, and would not be in accordance with an appropriate sequential development of these Regeneration (REGEN) zoned lands as a whole. The proposal would, therefore, **not represent a “plan-led” residential development, would be contrary to the provisions of the statutory Development Plan, and would be contrary to the proper planning and sustainable development of the area.**
2. It is considered that the format proposed for the **shared accommodation development**, with **significant numbers of individual units sharing a single common living/kitchen area on each floor**, and with a **notable shortfall in the quantitative and qualitative provision of sufficient communal**

facilities, would fail to provide an acceptable living environment for future residents of the development, contrary to the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities*, issued by the Department of Housing, Planning and Local Government in March 2018, and particularly **paragraphs 5.15, 5.22 and 5.23 of these Guidelines**. The proposed shared accommodation development would, therefore, be **contrary to these Ministerial Guidelines and would seriously injure the residential amenities of future occupants/residents, and accordingly would be contrary to the proper planning and sustainable development of the area.**

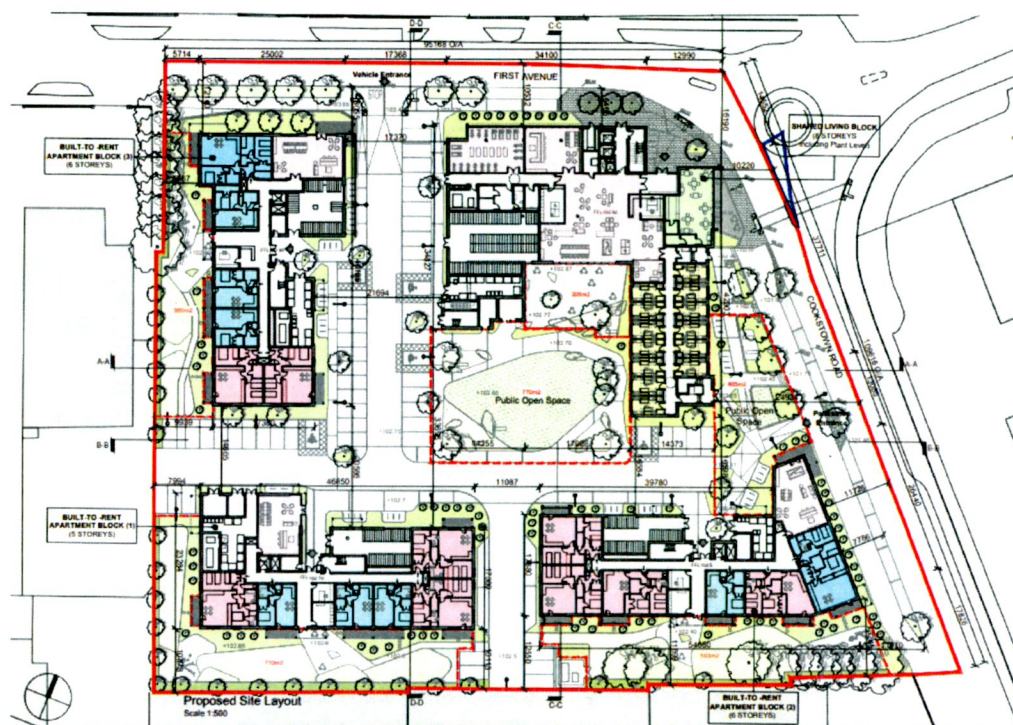


Figure 5 - Site Layout Plan Submitted with ABP303911-19

It is now considered that the subject proposal for a Transitional Care Facility remedies the previous reasons for refusal listed attached to the 2 no. previous mixed use applications lodged on the subject site.

The subject proposal remedies the previous reasons for refusal as follows:

- The proposed development includes for the interim provision of pedestrian and cycle infrastructure connecting the subject site to the Belgard Road Luas Stop to the north east and traversing a section of Cookstown Road from the subject site heading south. The areas where these works are proposed to take place have been included within the site redline boundary.
- It is considered that the height of the proposed Transitional Care Facility of 4 storeys above ground floor level is appropriate for the subject site given the envisioned height for this site as outlined within the Tallaght Local Area Plan 2020.
- It is considered that the cited reason for refusal of the previous application on the site relating to infrastructural issues has now been addressed. The proposed development includes increased and upgraded cycle facilities both within the development site and along Cookstown Road headed south of the development site and to the north east towards the Belgard Luas stop. The proposal now put forward for a Transitional Care Facility also includes for the provision of a Type 3 pumping station which will address concerns previously raised about the existing wastewater infrastructure on the site not being capable of sustaining additional development on the site

without upgrades. This infrastructural upgrade will ensure that the proposed Transitional Care Facility and any other development on the site can be sustained in terms of wastewater removal.

- It is now considered that the subject development addresses the previously raised refusal reasons relating to water and public realm. The proposal strengthens the green infrastructure on the site, providing planting and landscaped areas which will be usable for residents and the general public. The now proposed development features appropriate SuDS measures and an extensive green roof feature.
- All relevant development management standards will be strictly adhered to in terms of urban design/form, quality internal and external residential amenity and open space provisions.

4.2 Surrounding Sites

ABP-303306-18 – Belgard house, Belgard Square North, Belgard Road, Tallaght, Dublin 24

SHD Application submitted by Atlas GP Limited on 20 December 2018 for 438 no. Apartments and 403 no. bedspaces at Belgard Gardens, Belgard Square North and Belgard Road, Tallaght, Dublin 24. The application was granted by ABP on 15 April 2019.

ABP-301204-18 – Unit 5A-C, Second Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24

SHD Application submitted by Pymont Property Developments Ltd on 13 March 2018 for 126 apartments in three blocks, 2 commercial units, gym, creche, community room, underground car park providing 152 parking spaces, demolition of industrial units and all associated site works at Unit 5, Second Avenue, Cookstown, Dublin 24. The application was granted by ABP on 25 July 2019.

ABP-303803-19 – Unit 5A-C, Second Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24

SHD Application submitted by Pymont Property Developments Ltd on 20 February 2019 for 196 BTR at Unit 5, Second Avenue, Cookstown, Dublin 24. The application was granted by ABP on 25 July 2019.

It is understood that construction commenced on site in February 2022. Compliance submissions are being processed for the application at this time.

ABP-305763-19 – Site at the corner of Airton Road and Belgard Road, Tallaght, Dublin 24

SHD Application submitted by Power Scaffolding Supplies Limited on the 25 October 2019 for 328 no. apartments, ancillary residential support facilities and commercial floorspace measuring 31,147 square metres gross floor space above a single basement level measuring 5,861 square metres. The application was granted by ABP on 20 February 2020.

Construction has commenced on site and the existing structures were demolished in June 2022. It is understood that compliance submissions are being processed at this time.

ABP-305725-19 – Units 66 and 67 Fourth Avenue, Cookstown Industrial Estate

SHD Application submitted by Steelworks Property Developments Limited on the 18 October 2019 for 245 no. Build to Rent apartments and associated site works at Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24. The application was refused on the 13 February 2020.

ABP-306705-20 – Former Gallagher's Cigarette Factory at the Junction of Airton Road and Greenhills Road, Tallaght, Dublin 24

SHD Application submitted by Greenleaf Homes Limited on 18 February 2020 for 502 no. apartments with a creche and all associated site works. The application was granted on the 16 June 2020.

It is understood that construction commenced on site earlier this year.

ABP-308398-20 – Cookstown Cross SHD, Units 66 and 67 Fourth Avenue, Cookstown Industrial Estate

SHD Application submitted by Steelworks Property Developments Limited on 12 October 2020 for 252 BTR apartments, 2 commercial units and a creche at Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24. The application was granted permission on the 28 January 2021.

It is understood that compliance submissions were processed for this permission in May 2021.

ABP-309731-21 - Lands west of Old Belgard Road and north, south and west of Cookstown Road, Cookstown Industrial Estate, Dublin 24

SHD Application submitted by Joseph Costello Absolute Limousines Ltd (Applicant) on 19 March 2021 for the demolition of existing industrial and commercial buildings, construction of 1,104 no. apartments, creche and all other associated site works. This application was refused on 8 July 2021.

ABP 309916-21 - Glen Abbey SHD, Belgard Road, Cookstown Industrial Estate, Dublin 24

SHD application submitted by Square Foot Property Services Limited on the 9th of April 2021 for demolition of existing buildings on site and the construction of 170 no. Build to rent apartments, creche and associated site works. The application was approved 21 September 2021.

ABP-313591 – Lands at Broomhill Road and Unit 51 Broomhill, Tallaght, Dublin 24

SHD Application for the demolition of existing buildings and construction of 242 no. apartments, creche and associated site works. The application decision date was due 5 September 2022. No decision has been made at this time.

ABP-313591 – Lands at Belgard Square East, Belgard Road and Blessington Road, Tallaght, Dublin 24.

SHD Application for 310 no. Build to Rent apartments, creche and associated site works. The application decision date is due 28 September 2022. No decision has been made at this time.

ABP-306830-20 - Unit 1 Cookstown Extension, Cookstown Industrial Estate, Dublin 24

SHD Pre-Consultation Application submitted by Boherkill Property Developments Ltd on 6 March 2020 for the construction of 205 no. Build to Rent apartments and associated site works. The consultation required further consideration/amendment.

SDCC Part VIII Developments - Belgard Square North, Tallaght, Dublin 24.

○ **SD208/0005**

Part VIII application made by South Dublin County Council on 30 July 2020 for 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. The application was approved on the 12 October 2020.

It is understood this application was advertised for public tender in November 2021.

○ **SD208/0007**

Part VIII application made by South Dublin County Council (Housing) on 10 August 2020 for the construction of 133 affordable rental apartments with a community facility (c.12, 918sq.m) in three blocks ranging from three to eight storeys. This application was approved on 12 October 2020.

According to the SDCC Housing Delivery Action Plan 2022-2026, these units are expected to be delivered by 2024.

○ **SD208/0012**

Part VIII application made by South Dublin County Council on 01 October 2020 for the construction of an 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 application was approved on 14 December 2020.

It is understood construction commenced in March 2022.

4.3 Conclusion

The Planning History for the subject site and wider surrounding area is relevant to the subject proposal as it signifies a move away from the traditional industrial uses of the surrounding area, towards regenerative mixed-use development. The subject proposal for a Transitional Care Facility will provide supportive infrastructure that will complement the envisioned increase in population in the Cookstown area and provide a healthcare use close to new residential schemes and Tallaght hospital.

It is noted that a mixed-use residential application will be lodged on the eastern portion of the site subject to a separate future planning application that will further aid towards the realisation of the development objectives of the site as per the vision for the Cookstown Area as outlined in the Tallaght Town Centre Local Area Plan.

The form and scale of the proposal is reflective of the permitted developments near the site and the envisioned block plan for the area as outlined in the Tallaght Town Centre Local Area Plan. It is considered appropriate having regard to the regeneration objectives for the area.

It is noted that the following developments on surrounding sites have commenced construction in the Cookstown Neighbourhood:

- ABP-303803-19 – Unit 5A-C, Second Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24 - 196 no. units.

Permissions have been granted for 1189 units on lands surrounding the site, 196 of which have commenced construction, equating to 16% of permissions.

Overall, the subject site shares several similarities with the above permissions including:

1. The subject site is zoned 'REGEN'. In accordance with the policies and objectives of the County Plan and Tallaght LAP, the proposed Transitional Care Facility development is compatible with the zoning objective to regenerate vacant brownfield sites.
2. The proposal is reflective of the pattern of permitted development and changing context of the wider area. The proposal seeks to deliver a high quality Transitional Care Facility that will help to realise the regeneration objectives for the subject site, and complement surrounding residential permissions and any future uses on the subject site, providing another use on the regeneration lands that will support the community as it grows in the future.
3. The site is uniquely placed between social and transport infrastructure including high frequency bus and light rail services (Belgard Luas Stop c.450m). Tallaght Hospital and Tallaght Town Centre are less

than 1km to the south of the subject site and will cater to the needs of future occupants. The proposed internal street network aids infrastructural delivery of roads, streets and footpaths outlined in the LAP and permeability across the LAP area.

We trust that the Planning Authority will consider the above points in their assessment of the current proposal.

5 Description of Proposed Development

5.1 Summary of Proposed Development

The site (approx. 1.6727 ha) consists of unit 21 First Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24 and the areas included around the main body of the subject site included within the site redline boundary for provision of drainage works and public realm upgrades. The proposal includes the demolition of all existing commercial structures and construction of a Transitional Care Facility comprising 131 no. bedspaces arranged in a single block 4 storeys above ground floor.

The breakdown of bed spaces per floor is as follows:

- Ground Floor- 19 no. bedspaces
- First Floor – 28 no. bedspaces
- Second Floor – 28 no. bedspaces
- 3rd Floor – 28 no. bedspaces
- 4th Floor – 28 no. bedspaces

It is noted that the net site area, disregarding the public open space areas and the areas included within the site boundary for drainage works and public realm upgrades is 0.3784 ha. The proposed development on the site presents a coverage of 41% with a plot ratio of 1.78.

The previous reasons for refusal regarding plot ratio will be addressed by the overall development on the subject site. It is noted by the applicant that a mixed use residential development on the eastern portion of the site will be lodged subject to a separate future planning application. The total developable site area associated with the subject scheme in combination with the future application on the eastern portion of the site will be 1.162ha.

The total GFA of the proposed Transitional Care Facility is 6743sq.m. The preliminary GFA for the future application on the eastern portion of the site is 9614 sq.m. In combination, the total GFA of the subject application and future mixed use residential application will be 16357 sq.m (it is noted that this is subject to change).

This total GFA of 16357 sq.m on a developable site area of 1.162ha will give a preliminary plot ratio of 1.40 for the overall development site.

The preliminary overall plot ratio of 1.40 for the overall development site represents a reduction in plot ratio from the figure of 1.49 that was associated with the previous application on the lands lodged to SDCC (SD21A/0196).

The proposed ground floor plan prepared by EML Architects is shown on figure 6 below for the benefit of the Planning Authority:

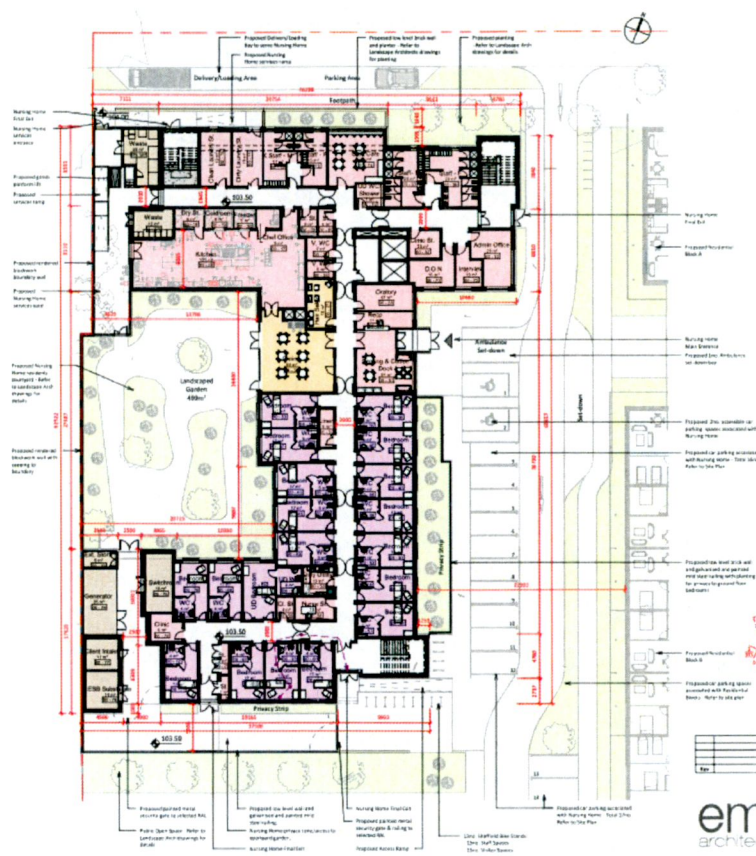


Figure 6 - Proposed Site Layout Plan

5.2 Detailed Description

The proposed development is described in detail as follows:

Bartra Property Cookstown Limited intend to apply for permission for development at a site of c.1.67ha at Unit 21, First Avenue, Cookstown Industrial Estate, Dublin 24. The development will consist of the following:

- Demolition of all existing 1-3 storey industrial/commercial structures and small café on site totalling c.5,500sqm in area;
- Construction of a 1-5 storey Transitional Care Facility (step-up/step-down) providing 131 no. bedspaces over partial basement (total floor area c.6,743sqm) with central courtyard (c.519sqm);
- The basement consists of a sprinkler tank and pump rooms, water tank room, plant room and workshop;
- Provision of dining and kitchen areas, sitting/family rooms, activity rooms, coffee dock, hair salon, oratory, lobbies/reception areas, ancillary offices and staff areas, stores, toilets, shower/changing facilities, ESB substation, generator, switchroom, service yard and waste areas serving the facility;
- Lobbies, stair/lifts, photovoltaic panels and green roofs throughout;
- Partial provision of the pocket park identified in the Tallaght LAP (c.1,286sqm);
- New vehicular access from First Avenue and egress onto Cookstown Road via a one-way system through the subject site;
- Entrance signage on the eastern elevation of the proposed facility;

All associated site development works, services provision, connection to the water supply, foul and surface water networks on First Avenue and Cookstown Road including partial diversion of the foul line to the north east of the site at First Avenue, temporary foul pump station, attenuation/bioretention systems, vehicular and pedestrian access including internal road and footpaths, interim pedestrian facilities/public realm upgrade works, landscape and boundary treatment works, tree removal, bicycle storage (76 no. total spaces), car parking (32 no. total spaces), set-down parking spaces, 1 no. ambulance set-down space serving the facility and delivery/loading areas to First Avenue

5.2.1 Transitional Care Facility Proposal

The 131 bed Transitional Care Facility is arranged 4 storeys above ground floor level and located to the west of the site.

The facility includes the following ancillary spaces: dining and kitchen areas, sitting/family rooms, activity rooms, coffee dock, hair salon, oratory, lobbies/reception areas, ancillary offices and staff areas, stores, toilets, shower/changing facilities, ESB substation, generator, switchroom, service yard and waste areas.

Discreet signage is proposed above the entrance on the east elevation facing the tertiary road. This is not visible from First Avenue or Cookstown Road, as shown on the accompanying elevation drawing prepared by EML Architects.

The T-Shaped facility overlooks a landscaped courtyard accessible to residents and staff alike.

5.2.1.1 Model of Care

In line with the policy approach outlined in Slaintecare and the HSE Annual Service Plan, delivering enhanced community care, reducing our dependence on the current hospital-centric model of care and supporting capacity building in the community is key to realising the vision for delivery of healthcare for the 21st Century. With our growing and ageing population and the increasing incidence of chronic disease, timely access to primary care, aligned to general practice, and delivering services at home and in the community will not only ease pressure on our hospital system, but it will also deliver what clients and services users want and need. A central element of these policies is either preventing hospital admissions or allowing for discharge earlier than would have been possible without these supports. The proposed Transitional Care facility at Cookstown is part of the provision by Bartra Healthcare of facilities which will assist the HSE in meeting its primary objective of "Enhancing primary and community services and reducing the need for people to attend hospitals". The latest population projections indicate a 38% increase in the over 65's and a 68% increase in the over 85's by 2031. This growing and ageing population will result in an increased demand for similar facilities to - provide a variety of services to meet and progress the objectives outlined in Sláintecare.

This provision of high-quality care has already been demonstrated by Bartra who have a proven track record for providing person-centred care to older people in its other facilities and have achieved full compliance with the Regulations and Standards monitored by the Health Information and Quality Authority (HIQA). Bartra's facility at Beaumont Lodge, in close proximity to Beaumont Hospital, provides transitional care on behalf of the HSE as a step-down unit. To date the facility at Beaumont has saved some 68,000 acute hospital beds previously lost through delayed discharges.

The Transitional Care facility will also provide a specialized dementia care unit to meet the demands of the local population as the number of people living with dementia is set to increase significantly in coming years (estimated to be 150,000 by 2046).

It is widely known and accepted that acute care is expensive and can often be avoided. This facility will reduce the cost to the exchequer as it will prevent unnecessary admissions to acute services and provide

respite and nursing/ step-down care at a more reasonable cost. Caring for patients in transitional facilities reduces cost by approximately 66% compared to the cost of care in an acute hospital bed.

Caring for patients in transition facilities also increases the capacity available for acute care in acute hospitals, which will help to improve the hospital system's ability to deal with the post pandemic backlog of patients requiring acute care.

The proposed Bartra facility at Cookstown will also deliver the following services:

Step-Down Facilities

The proposed facility will provide high quality nursing and transitional (step down care) to the local population which will reduce the demand and unnecessary reliance on the already over-stretched acute hospitals in the area. The provision of these additional services align with the objectives in the HSE National Service Plan and the HE Annual Winter Plan.

Respite Facilities

The proposed facility can also provide services to people in the community who require care and treatment but do not require acute hospital services. It is envisaged that these people will be referred to this service from local public health nurses. In addition, the risk of patients acquiring hospital related infections will be significantly reduced which is a significant benefit to patients and the provider.

Mobile Diagnostics

The proposed facility will also provide timely and increased access to diagnostics for GPs such as mobile Xray's machines, ultrasounds. This initiative is fully aligned to the targets set out in Slaintecare as a means of reducing the pressure on the A&E Departments of acute hospitals and creating more capacity for diagnostics in the community.

The proposed unit differs substantially from the traditional nursing home use having regard to the clinical healthcare environment and range of services offered as outlined above.

Client Mobility

It is noted that due to the nature of the proposed development as a transitional care facility, clients will primarily be spending a period of time within the facility for additional recovery from a surgery or major illness after being discharged from an acute hospital. Due to the nature of the clientele being those in recovery or step down care, all needs of the clients will be provided for on site, negating the need for any trips that may arise from a similar sized development of usual residential nature, such as trips to a local post office, bank or shop.

It is noted that due to the applicant operating a number of schemes of a similar typology, Bartra has extensive experience operating developments of this nature. The applicant will provide private mini bus services to residents of the transitional care facility who wish to carry out day to day tasks. An example of one of these mini buses operated by the applicant can be seen in figure 7 below:



Figure 7: Bartra Mini Bus

5.2.1.2 Care Provision Tallaght

The provision of a Transitional Care facility is important on the site due to the aging demographic profile of the wider jurisdiction of South Dublin County council and the lack of care facilities surrounding the site. The South Dublin County Development Plan 2022-2028 outlines the need for Housing for Older people, with Section 6.3.1 stating that:

'The projected growth in the 65 and over age group forms the largest change up to 2031 with a projected increase of 56.4% (17,447 persons) by 2031. This is a continuation of the trend from previous years where the cohort increased by 33% between 2011 and 2016 which is an increased rate from the 29% between 2006 and 2011 Census. This represented a 73% growth of this age group over the 10-year period of 2006-2016'.

The percentage of older people as well as the lack of care facilities for them around the Cookstown and Tallaght areas mean that the provision of a 131 bed Transitional Care facility would be a welcome addition to the area.

It was identified through means of a desktop study conducted in September 2022 that there were only 6 care facilities for older people within a 5km radius of the subject site. These are as follows:

- Tymon North Community Unit, Tymon North (2.03km)
- Glencarrig Nursing Home, Firhouse (2.85km)
- Lexington House Nursing Home, Clondalkin (2.85km)
- Sallypark Nursing Home, Knocklyon (3.17km)
- TLC Centre, Citywest (3.78km)
- Padre Pio Nursing Home, Cappagh (4.18km)

The Transitional Care facility provided on site would be conveniently located close to Tallaght Hospital, and would establish itself as the closest care facility to the hospital, delivering enhanced community care and reducing dependence on the current hospital centric model of caring for older people. The proximity of the facility to Tallaght Hospital means that it could be used as a step-down facility allowing patient recovery within the new mixed use residential neighbourhood, while also serving as a step-up facility.

5.2.2 Demolition

The existing buildings on the site totalling c.5500 sq.m will be demolished to accommodate the subject proposal. The buildings to be demolished consist of low quality disused industrial units 1-3 storeys in height. Details of the buildings to be demolished are included on the demolition drawings prepared by EML Architects.

5.2.3 Building Height

The proposed Transitional Care Facility proposed will be a maximum of 4 storey above ground floor level in height. The building also features a small section that will be a single storey facing onto the proposed public open space pocket park in the southwest corner of the development site.

The proposed east and west elevations for the proposed facility are shown on figure 9 below for the benefit of the Planning Authority.

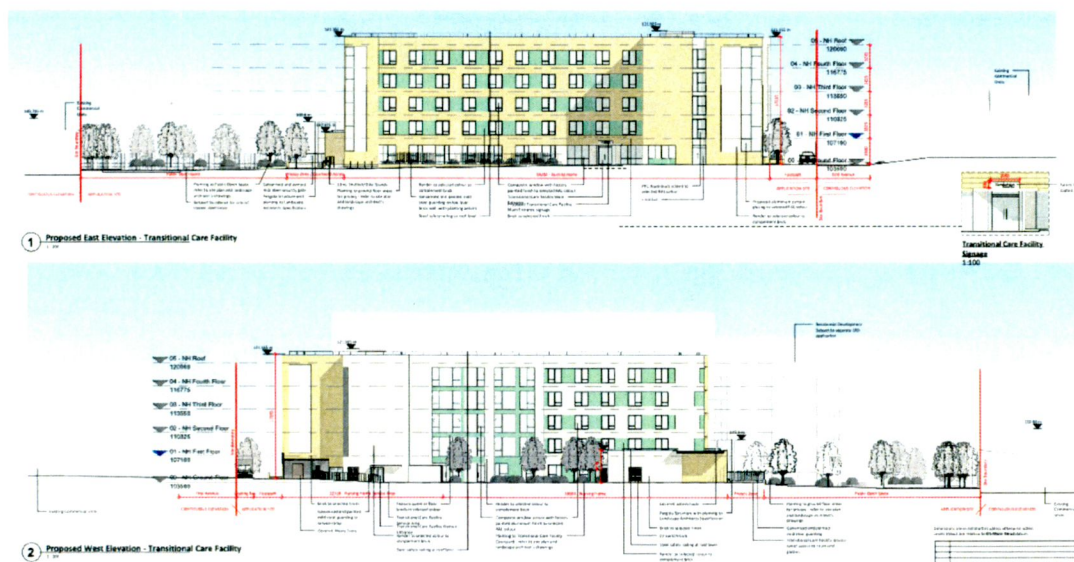


Figure 8 – Transitional Care Facility East/West Elevations

5.2.4 Lighting Considerations

A Daylight/ Sunlight Assessment Report has been prepared for the proposed development by JV Tierney. Daylight analysis has been undertaken on all occupiable rooms, 159 no. total, including office spaces, dining rooms, living spaces and bedrooms. Of the 159 no. rooms that have been assessed 156 no. meet the target daylight levels outlined in BS EN 17037, equating to 98.1% of all rooms meeting the guidelines of BR209 (2022). The development has also been assessed in line with the new IS EN 17037, with the results for both assessments summarised as follows:

- Daylight –
 - BS EN 17037 – 159 no. rooms assessed, 98.1% of all rooms meet the criteria.
 - IS EN 17037 – 159 no. rooms assessed, 78% of all rooms meet the criteria.
- Sunlight –
 - Transitional Care Facility – 159 no. rooms assessed, 78% of all rooms meet the criteria
 - Amenity – 1805 sq.m of Communal/ Public Open Space provided, 98.8% of the area meets the criteria.

The developments' location in a primarily low rise light industrial area means that there are no adverse impacts relating to overlooking or overshadowing caused by the development to adjacent sites. No residential amenity in the surrounding area is compromised by the scale or massing of the development. When looked at as a total, the quantum of spaces meeting the daylight factor targets is more than 80% which exceeds international environmental assessment standards. For example LEED targets a figure of 75% to award a credit under the daylighting criteria and demonstrates that the development has 'maximised the daylight' for the occupied spaces.

5.2.5 Open Space

The delivery of quality open spaces was a key design objective from the outset of the design concept. All communal and public open spaces are passively overlooked by the Transitional Care facility. No incidental spaces are found on site as a result. Buffer planting to the north of the Transitional Care Facility in the form of tree and shrub planting create privacy strips separating the public footpath from the private ground floor areas.

The hierarchy of open spaces complements the proposed uses across the site and create attractive human scale spaces for contemplation, reflection, play and social interaction. The communal spaces are directly accessed from the Care Facility. The public open space is accessible from First Avenue and Cookstown Road via the new tertiary route.

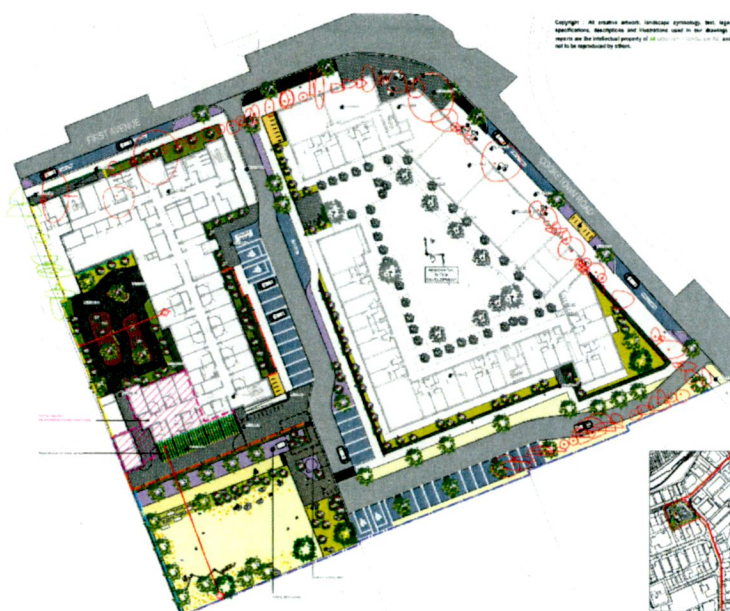


Figure 9 -Proposed Landscape Masterplan

Public open space is provided in the form of a partial pocket park to the southwest of the site, at a rate of c.10% of the development site area (c.1,286sqm), slightly larger than that proposed within previous applications on the site. It is noted by the applicant that the provided area of public space is not required as part of the subject application for a Transitional Care Facility. This area of Public Open Space is associated with the future residential mixed use application that will be lodged on the eastern portion of the subject site.

The area of public open space for the future mixed use residential application is being delivered in tandem with the now proposed Transitional Care Facility, as it is located adjacent to the care facility in accordance with the block plan for the site as outlined in the Tallaght Town Centre Local Area Plan. Delivering this area of public open space at this stage of development of the overall site will allow the entirety of the western portion of the site to be comprehensively addressed in a single phase of development, with development of the eastern portion of the site to be addressed subject to a future separate planning application for a mixed use residential scheme.

The location of the pocket park area has been chosen to enable the seamless continuation of the park area as adjoining sites to the west and south west are redeveloped in the future to align with the objectives for Cookstown as aligned on the masterplan for the area included within the Tallaght Town Centre LAP.

The central courtyard serving the Transitional Care Facility provides garden like space for residents and staff to enjoy throughout the year. The outdoor space is drawn into the internal areas due to the block's orientation and extensive fenestration along the western elevation. This area of communal open space totals 519 sq.m.

All communal and public open spaces have been designed having regard to universal access for all user, irrespective of mobility. Informal recreation and natural play areas serving children and teenagers alike are located in the public open space/pocket park. Several seating areas will allow residents young and old to meet and socialise on site.

The existing trees on site consist of low arboricultural value non-native trees and are proposed for removal. However, compensatory tree, shrub and amenity planting comprising native species are proposed and will enhance local biodiversity on site. Parking areas are interspersed with tree planting. The entrance to the pocket park is denoted by specimen trees leading from the tertiary road.

In terms of green infrastructure and drainage systems, stormwater tree pits and landscape swales combined with permeable paving are proposed as part of landscape proposals. An extensive green roof is also included as part of the subject proposal.

We refer the Planning Authority to the Landscape Masterplan document prepared by ÁIT submitted as part of this application for more details on landscaping proposals.

5.2.6 Access and Parking

Site access for vehicles will be from a new entrance located on First Avenue to the north of the site. It will consist of a one way internal roadway which travels through the site and exits the site to the east onto Cookstown Road.

The development shall incorporate a new vehicular access point from First Avenue. Upgrade works are proposed to this this vehicular access point to facilitate the increased vehicular and pedestrian traffic associated with the development and to provide for improved access and egress for the overall development. New pedestrian access points will be provided along First Avenue and Cookstown Road.

The Transitional Care Facility will have access for pedestrians off the main roads and from the site internally. Pedestrian access to the Transitional Care Facility is via First Avenue. There is also pedestrian access to the site from the south east corner of the site at Cookstown Road.

These pedestrian access points continue through the site as footpaths which run parallel to the internal one way street.

The proposed development will provide 32 no. car parking spaces total. 17 no. car parking spaces will be associated with the proposed development, which equates to 1 per 8 no. staff members. The remaining 15 no. car parking spaces will be associated with a future residential development on the eastern portion of the subject site. This is considered appropriate given the nature of the development as a Transitional Care Facility car parking will not be needed for residents. 1 no. Ambulance set down space will also be provided as part of the proposal.

A set down area for passenger and delivery drop off will be provided for the proposed development along First Avenue to allow for deliveries and drop off to be managed efficiently without having additional traffic enter the central area of the development site.

Adequate bicycle parking is also provided for the development, with 13 no. bicycle parking spaces provided for the staff members (1 per 5 staff members) and 13 no. bicycle parking spaces for residents (1 per 10 residents).

5.2.7 Landscape and Visual Impact

A landscape and visual impact assessment has been prepared in respect of the proposed development by Ait Place. This visual impact statement assesses the proposed development from 20 no. chosen viewpoints close to the development site.

The visual impact statement concludes that the impact of the development from the 20 no. viewpoints varies dependent on the viewpoint and the sensitivity of the view. It is considered that from 9 no. of the 20 no. viewpoints chosen, the development will have no visual impact.

It is considered that the proposed development will have a neutral and slight and slight to imperceptible impact in the long term from 8 no. chosen viewpoints.

1 no. chosen view is considered to have a slight to moderate long-term impact, from Cookstown Road, approximately 188 metres from the development site.

1 no. chosen view was considered to have a positive and moderate long-term impact, from First Avenue, approximately 122 metres from the subject development.

The assessment notes that the proposal is a positive shift towards regenerative development, as the existing low quality, low visual amenity industrial and commercial units on the site will be demolished and replaced by a well-designed transitional care facility with a high-quality public realm, which will form part of a wider masterplan for the adjacent streets.

We refer the Planning Authority to the accompanying Landscape and Visual Impact Assessment report prepared by Ait Place accompanying this application for a full assessment of the visual impact of the proposed scheme.

5.2.8 Operational Waste Management

An Operational Waste Management Plan for the proposed development has been prepared by AWN Consulting. The OWMP has been prepared to ensure that when operational, the management of all waste generated by the proposed development is managed in accordance with current legal and industry standards.

The implementation of an Operational Waste Management Plan will ensure that a high level of recycling, reuse and recovery takes place when the development is operational. All recyclable materials will be segregated at source to reduce waste contractor costs and ensure maximum diversion from landfills, thus contributing to targets set out in the EMR Waste Management Plan 2015-2021.

It is concluded that the waste storage strategy presented will provide sufficient storage capacity for the estimated quantities of segregated waste. Designated areas for waste storage will provide sufficient room for the required receptacles in accordance with the strategy outlined in the OWMP. We refer the Planning Authority to the submitted Operational Waste Management Plan prepared by AWN Consulting for additional detail.

5.2.9 Construction & Demolition Waste Management

An Outline Construction and Demolition Waste Management Plan has been prepared by O'Connor Sutton Cronin & Associates Engineers to provide a structured plan to ensure that the management of construction and demolition waste on the development site is in accordance with current legal and industry standards including the Waste Management Acts 1996 – 2011 and associated regulations 1, Protection of the Environment act 2003 as amended with EPA Acts 1992 to 2013 2, Litter Pollution Act 1997 amended and the relevant Waste Management Plans and to provide necessary information to ensure that the management of waste produced by the site is carried out in accordance with all current legal and environmental standards.

We refer the Planning Authority to the Construction and Demolition Waste Management Plan prepared by O'Connor Sutton Cronin & Associates for additional detail.

5.2.10 Sustainability and Energy

A Sustainability and Energy Report has been prepared for the subject development by JV Tierney Sustainable Design Engineers. The sustainability and energy strategy for the proposed Transitional Care Facility employs an approach that will demonstrate how the building can achieve NZEB compliance based on Part L 2021.

The incorporation of sustainable strategies into the project deliverables will encourage the commitment to sustainable design at a very early stage with the client and design team to ensure that the development is best in class. Adopting this approach will ensure that the development meets the principles of the Governments 'National Climate Change Policy', SDCC Development Plan 2022-2028 objectives regarding Climate Change and Energy Efficiency and that it exceeds the requirements of the Building Regulations Part L 2021 and maximises the reduction in Carbon Dioxide emissions, thus demonstrating the Clients commitment to mitigation against climate change.

We refer the Planning Authority to the Sustainability and Energy Report prepared by JV Tierney Sustainable Design Engineers for a detailed outline of the approach used regarding sustainability and energy when designing the subject proposal.

5.2.11 Engineering Services

An Engineering Services Report has been prepared for the proposed development by O'Connor Sutton Cronin Engineers. This report has been prepared respecting the following services: Surface Water Drainage, Wastewater Drainage, Potable Water Supply and Site-Specific Flood Risk Management.

The proposed development surface water will be managed by a gravity surface water drainage network containing a single catchment area, because of natural site topography with attenuated surface water runoff, generated within the new development site boundary, discharging into the existing 450 mm diameter surface water pipe approximately 40 metres from the south-eastern boundary of the site on Cookstown Road. SuDS systems will be provided within the development site where practicable.

Wastewater from the development will be removed via a proposed gravity wastewater sewer design, that has been designed in accordance with Irish Waters Code of Practice for Wastewater Infrastructure. The site is currently brownfield and has an existing wastewater discharge to the public wastewater infrastructure. It is proposed to divert the existing 300 mm diameter public wastewater pipe located at the northern boundary of the site. This proposed wastewater diversion is to be confirmed by a Diversion Agreement with Irish Water prior to any works commencing on site.

It is noted that Irish Water advised the following:

'Peak discharge flow from the development site has to be limited to 5l/s due to downstream network constraints. This can be achieved with the provision of an on-site pumping station (ps) with a maximum capacity of 5l/s. The PS may be designed to be bypassed at a future date.

In response to the above advisory note from Irish Water regarding the development site, we confirm that a Type 3 pumping station will be provided in the southwest corner of the development site.

Potable water for the proposed development will be from a new 150 mm diameter HDPE watermain connection that will be provided from the existing 12" AC watermain along the footpath on Cookstown Estate Road and First Avenue.

The Flood Risk Assessment for the development conducted by OCSC concludes that the development site is in an area that is not at risk of coastal, pluvial, groundwater or fluvial flooding.

We refer the Planning Authority to the Engineering Services report prepared by O'Connor Sutton Cronin Engineers for a full detailed overview of site services and flood risk.

5.2.12 Mobility Management

A Mobility Management Plan has been prepared for the proposed development by O'Connor Sutton Cronin Engineers. This plan has been prepared with the aim of reducing car use and the need for car use by staff through increasing the attractiveness and practicality of other modes of transport and by reducing the need to travel. The prepared Mobility Management Plan provides the following:

- A comprehensive overview of existing public transport services
- Identification of connections from the development to the local public transport
- A statement on the nature and extent of facilities that will be provided to encourage walking and cycling
- Sets out targets for each modal choice
- Provides an outline of various relevant schemes that could facilitate a change in travel patterns to and from work

The mobility management plan provided concludes that the location of the proposed development along with the consideration of appropriate measures, will aim to ensure that travel by public transport, bike or foot is preferred to travel by private car for staff of the Transitional Care Facility.

5.2.13 Public Lighting

A Public Lighting Layout for the proposed development has been prepared by JV Tierney Mechanical, Electrical and Sustainable Engineers. The site lighting plan has been designed to provide lighting in exceedance of minimum SDCC standards on all roadways and paths. All walkways will have a P4 lighting

class, and all roadways will have a P2 lighting class with calculation from surface on the ground. To comply with Part M requirements, disabled parking bays will be lit up to 20 lux minimum. Stairs and ramps will be lit up to 100 lux minimum.

For details on public lighting, we refer the Planning Authority to the Public Lighting Layout and Site Lighting Report drawing prepared by JV Tierney submitted as part of this application pack.

5.2.14 Environmental Considerations

A comprehensive AA Screening Report was prepared by Enviroguide and accompanies this application. The assessment concludes that on the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available, that the possibility of any significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a Natura Impact Statement (NIS) is not required.

An EIA has not been prepared for this proposed development having regard to:

- the nature, scale and location of the proposed development on an urban site served by public infrastructure;
- the absence of any significant environmental sensitivities in the area; and
- the location of the development outside of any sensitive location specified in article 109(3) of the Planning and Development Regulations 2001 (as amended).

On the basis of the above, we conclude the Proposed Development is not likely to have significant effects on the environment.

5.2.15 Noise

A Noise Assessment for the proposed development has been prepared by RSK. The ProPG noise risk categories for the facades of the development most exposed to road traffic noise are as follows:

- Daytime – Low to Medium
- Nighttime – Low to Medium.

It is considered that plant noise from the proposed development shall not cause adverse impact when rated in accordance with BS 4142:2014 + A1:2019: Methods for rating and Assessing industrial and commercial sound.

6 Relationship to Surrounding Development

This section of the report provides a summary of the relationship of the proposed development to existing surrounding development. The industrial and commercial area is characterised by low rise 1-3 storey warehouse and office buildings.

The Tallaght Local Area plan has a vision for Cookstown to be “An attractive mixed use residential led neighbourhood with distinctive urban qualities and high levels of access to public transport and the urban centre.”.

The proposed Transitional Care Facility provides active street frontage along First Avenue to the north of the development site via the provision of a parking bay and loading/ delivery area and services entrance along this façade. Given the nature of the scheme as a Transitional Care Facility, there will be a steady stream of deliveries and drop offs to the facility, meaning that a high volume of activity will be maintained along this façade.

The existing site layout inhibits pedestrian and cyclist movement. The proposed layout allows filtered permeability through the site and is the first step in developing sites further west on First Avenue.

The T-Shaped design of the Transitional Care Facility and partial pocket park provides physical relief to the adjoining site. Generous separation distances of c.20m from the building core to the site boundary ensure the privacy and amenity of the site will be maintained if developed in the future.

The pocket park located in the south westernmost corner of the site creates distances of up to c.38m between the Transitional Care Facility and southern boundary. It is noted that this area of public open space whilst provided in tandem with the proposed Transitional Care Facility, will be explicitly associated with the public open space requirements for a future mixed use residential scheme on the eastern portion of the site, subject to a separate future planning application.

To this end, the development potential of the adjoining sites to the west and south are not inhibited by the subject proposal.

The elevation of the proposed building along the northern boundary of the site with First Avenue is shown on figure 10 below:



Figure 10 – Proposed North Facing Elevation onto First Avenue

7 Strategic Planning Context

The following section details compliance of the proposal with strategic planning policy.

7.1 Project Ireland 2040 – National Planning Framework

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040. The Framework focuses on:

- Growing our regions, their cities, towns and villages and rural fabric.
- Building more accessible urban centres of scale.
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment, and delivery.

As a strategic development framework, this Plan sets out the long-term context for the country's physical development and associated progress in economic, social, and environmental terms and in an island, European and global context. Project 2040 is followed and underpinned by supporting policies and actions at sectoral, regional, and local levels. The key high - level objectives of the Plan are:

- To continue a path of economic, environmental and social progress that will improve our prosperity, sustainability and well - being.
- To ensure that Irelands many unique assets can be built upon, with an emphasis on improving economic output and stability as well as quality of life, environmental performances and the liveability of Dublin, our cities, towns, and rural areas.
- To set out likely future change in Ireland and the spatial pattern required for effective and co-ordinated investment in a range of sectors to best accommodates and support that change.
- To put in place a strategy for the sustainable development of places in Ireland and how that can be achieved through planning, investment, and implementation.

The NPF notes in section 6.4 relating to Age Friendly Communities that:

'ESRI projections indicate that the numbers of people aged over 65 will more than double to 1.3 million people by 2040, making up approximately 23% of the population. This compares to 13.5% in 2016. In addition, it is expected that the population aged over 85 will quadruple. As people get older they are likely to have increasingly complex healthcare needs, with a requirement for services and facilities to support provision of suitable and necessary care.'

The proposed Transitional Care Facility is supportive infrastructure that will be able to cater for an ageing population in the near future and is located close to Tallaght Hospital. The facility is located on regeneration lands which will have a rising population as surrounding sites are redeveloped from their current industrial use to mixed use residential developments. The proposed Transitional Care Facility is a key piece of social infrastructure that will be needed to support the increasing population in the future at Cookstown.

The following policies are considered key in the context of this site:

National Policy Objective 6 -

Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

National Policy Objective 11 -

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 30 –

Local planning, housing, transport/ accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.

National Policy Objective 33 -

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

National Policy Objective 35 -

Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

National Policy Objective 74 -

Secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.

7.2 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031

The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES)* was published and adopted in 2019. This Strategy provides the policy framework to manage spatial planning and economic development in the Region. The document consists of the following:

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- **Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The site is identified as being in the ‘Dublin City and Suburbs’ and is part of the Dublin Metropolitan Area as set out below:



Figure 11 – Dublin City and Suburbs [Source: RSES for Eastern and Midland Regional Assembly]

The Metropolitan Area Strategy Plan (MASP) in Chapter 5 of the RSES identifies a number of large – scale strategic residential and economic development areas, that will deliver significant development in an integrated and sustainable manner in the metropolitan area. The requirement for the preparation of MASP was set out in Project Ireland 2040 - National Planning Framework. MASP provides for a 12–20-year strategic planning and investment framework for the Dublin Metropolitan area.

The RSES supports continued population and economic growth in Dublin City and Suburbs, with high quality new development promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration. It is set out that there is an opportunity to promote and improve the provision of public transport and active travel and the development of strategic amenities to provide for sustainable communities. In terms of consolidation and re-intensification, the following policy objective is noted:

Consolidation and Re-Intensification

“RPO 4.3: Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”

It is considered that the proposed Transitional Care Facility will offer a people intensive use on the site, offering both employment rolls and a care use on a brownfield regeneration site in Cookstown. The proposed development also offers interim public realm upgrades for cyclists and pedestrians, improving connections from the development site towards the Belgard Luas Stop and Bus Stops located in Tallaght Town Centre.

7.3 Regional Planning Guidelines for the Greater Dublin Area 2010-2022

The Regional Planning Guidelines (RPGs) 2010-2022 is a policy document, which aims to direct the future growth of the GDA and works towards the implementation of the relevant strategic planning framework. We note specifically that the Guidelines provide an overall strategic context for the Development Plans of each local authority in the GDA including population and housing targets, and they also provide a framework for future investment in environmental services, transportation, and other infrastructure.

Section 8.6 of the Regional Planning Guidelines deals with the provision of Healthcare Facilities within the Greater Dublin Area. The document acknowledges that *‘an important part of health provision in the community is the development of respite and nursing home facilities.*

The guidelines note the need for facilities such as the proposed Transitional Care Facility and states that:

‘Demographic projections for the State show that in coming decades the number of older people will form a larger part of society and planning to cater for their needs within communities needs to take place, in partnership with the health authorities. Such facilities should be easily accessible for both residents, patients, staff and visitors from the surrounding community and not be isolated in terms of location except where particular circumstances require it. In an ageing society, focus must be put on incorporating nursing homes and respite centres as accessible and integrated community facilities’

It is our view that the current proposal delivers on the above objectives of the RPGs for the following reasons:

- The site is suitably zoned and appropriately serviced, near high quality public transport.
- The proposed development is in close proximity to Tallaght Hospital.
- The proposal delivers on excellent local connections to the town centre and beyond; and
- The proposal can act as a catalyst for future development at this location, within the Cookstown regeneration zone

As stated above, the proposed development will represent an opportunity for the redevelopment of an under-utilised site and will contribute to reach targets set out by the RPGs.

8 Section 28 Ministerial Guidelines

Each of the relevant strategic policy documents are now considered below and their relevance to the subject site and the developments compliance with same, is assessed in detail.

8.1 Design Manual for Urban Roads and Streets (2019)

The Design Manual for Urban Roads and Streets (DMURS), 2019, sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. DMURS places a focus on pedestrians, cyclists and public transport users and sets out guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland.

Consideration of DMURS and its contents has been a key objective for this project. The four key design principles have been incorporated as follows:

- **Connected networks:** To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular, more sustainable forms of transport.

- The site layout improves connections and permeability from First Avenue to Cookstown Road through the provision of a new internal one-way street running from First Avenue to Cookstown Road. The development will also provide upgrades to the existing pedestrian footpath along Cookstown Road and First Avenue.

Surface bicycle parking spaces are dispersed throughout the scheme, encouraging cycle use throughout the development.

- **Multi-functions streets:** The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment.

The main point of entry for vehicles, pedestrians and cyclists is to the North of the site, via First Avenue. This route also caters for emergency and refuse vehicles when required. There is limited possibility of encouraging multi-functional streets in this application due to the nature of this development as a Transitional Care Facility, with a future mixed use residential development to

be lodged on the eastern portion of the site. However, this development encourages increased multi-functional use of First Avenue and Cookstown Road for pedestrians and cyclists. The key pedestrian routes into/out of the site have been considered and designed accordingly. The northern entrance is located adjacent to the Transitional Care Facility.

Legible street frontage is provided along Cookstown Road and integration of the development with the public realm is encouraged via the provision of the 2 no. commercial units along Cookstown road. This creates frontage encourages and allows the public to interact and engage with the development along Cookstown Road.

- Pedestrian focus: The quality of the street is measured by the quality of the pedestrian environment.

Pedestrians are considered throughout the development with improved connectivity throughout the site. Pedestrian walkways are prioritised over vehicular roadways throughout the proposal.

The reduced parking capacity and provision of a one-way internal street for vehicular access encourages a low amount of vehicular activity and promotes low speeds for vehicles travelling through the site, increasing the safety of the development for pedestrians.

The development improves the local pedestrian infrastructure network with the introduction of new local pedestrian crossings alongside dropped kerbs and tactile paving to ensure safe use for all pedestrians.

- Multidisciplinary approach: Greater communication and co-operation between design professionals through the promotion of a plan-led, multidisciplinary approach to design. The multi-disciplinary approach is reflected in the chosen design which arose from meetings with the design team. This has ensured a holistic and considered approach to designing the development has been maintained.

We refer to the Transport Assessment including Mobility Management Plan prepared by OCSC for more information.

9 Statutory Planning Context

9.1 South Dublin County Council Development Plan 2022-2028

The South Dublin County Development Plan 2022- 2028 is the relevant statutory planning context for the subject site. This Plan will remain valid for 6 years, subject to any review, variations, extensions, or alterations made during the lifetime of the permission.

10.1.1 Zoning

The subject site is zoned 'REGEN' under the current County Development Plan. The objective is

'To facilitate enterprise and/or residential led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery'

The proposed commercial Transitional Care Facility fulfils this objective, providing 131 no. bedspaces for step down care close to Tallaght Hospital.

There are no known protected structures or national monuments on or near the site. Furthermore, the site is not located in a conservation area. Given the brownfield nature of this industrial/commercial site, there is a low probability of archaeology on site.

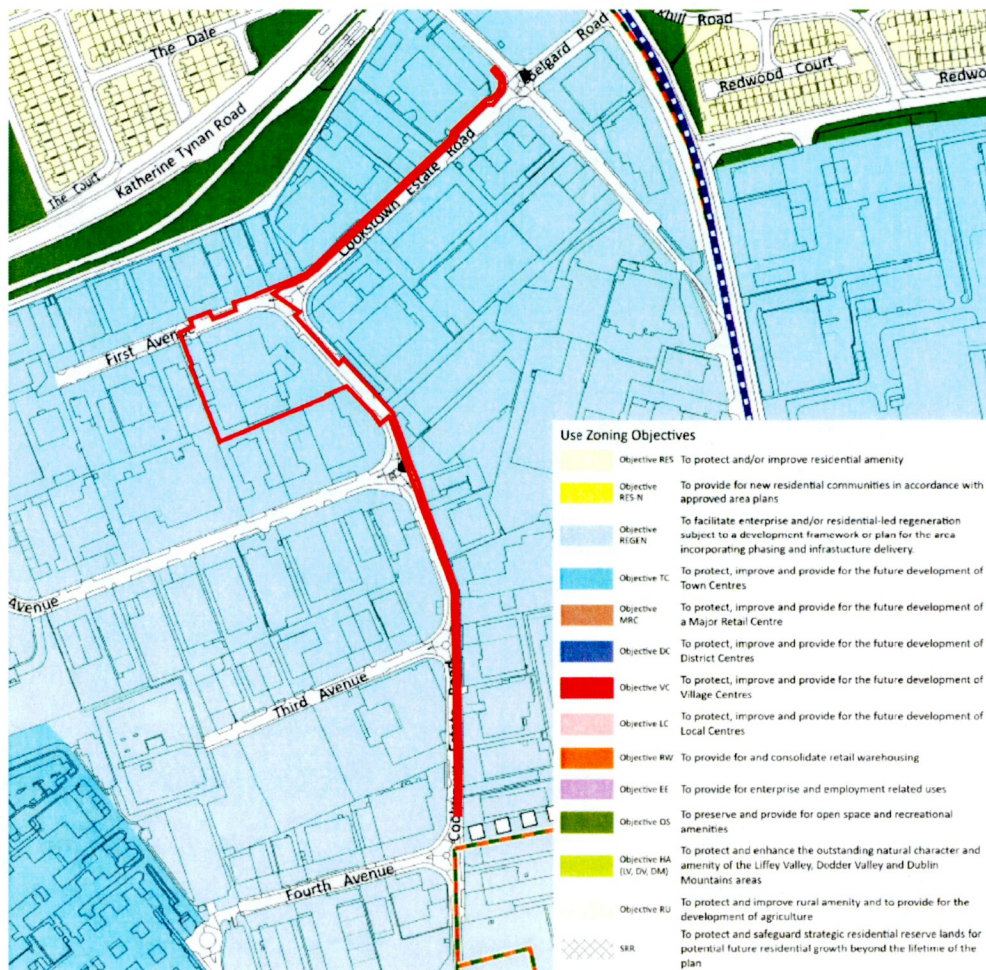


Figure 12 – Zoning Map

10.1.2 REGEN Policies and Objectives

The SDCC vision for this zoning is as follows:

‘to facilitate enterprise and / or residential led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery’

A previously stated the subject proposal will act as a catalyst for development in the subject area. The proposed Transitional Care Facility provides essential social infrastructure that will support the growing population in the surrounding Cookstown area as it is developed into a mixed use residential neighbourhood in accordance with the objectives for the surrounding area as regeneration lands, with an aim to move away from the established industrial use.

10.1.3 SDCC Development Guidance – Regen Zones

In accordance with Section 11.9.1 of the Plan, development proposals in Regeneration (REGEN) zones should address the following criteria:

‘Demonstrate a clear transition towards a more urban form of development and a traditional street network.

Address connectivity and linkages in the area and demonstrate that the development of the site would not give rise to isolated piecemeal pockets of residential development that are disconnected from shops, amenities and/or other residences’.

The following map identifies the location of the site in the context of adjoining facilities

Open space, transport links, convenience shopping and leisure facilities are all within walking distance of the proposed development.



Figure 13 - Distance to Employment Hubs and Amenities

Luas Belgard

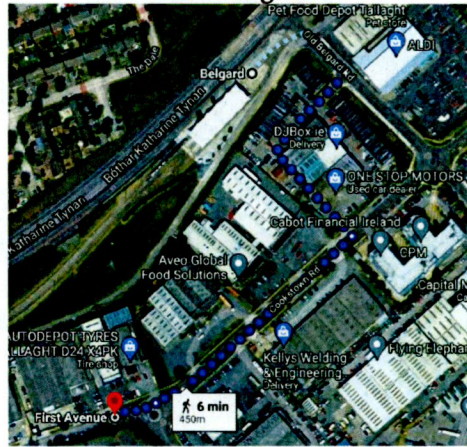


Figure 14 - Distance to Luas

Luas Belgard is located 450 metres or a 6-minute walk away from the subject lands.

Tallaght Hospital

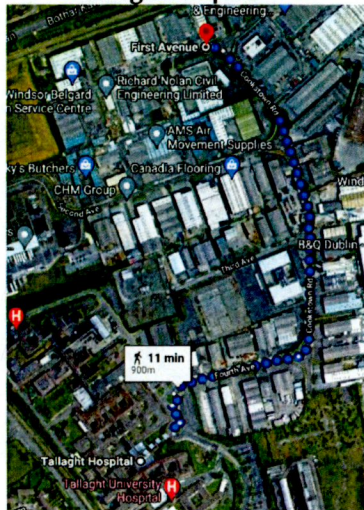


Figure 15 - Distance to Tallaght Hospital

TU Dublin



Figure 16 - Distance to TU Dublin

Tallaght Hospital is located 900 metres or an 11-minute walk from the subject lands. Tallaght institute of Technology is located a 1.6 kilometre or 21-minute walk from the subject lands

As shown above, significant employment centres including Tallaght University Hospital, TU Dublin (Tallaght) Campus, and The Square are also in immediate proximity to the site.

The proposal represents an appropriate form of development which will not prejudice the development potential of any adjoining sites and provides an appropriate land use. The proposed Transitional Care Facility is in close proximity to Tallaght Hospital and will provide essential healthcare infrastructure within the Cookstown regeneration zone that will support a growing population.

‘Given the transitional nature of Regeneration zones, precautions will be taken to ensure that the potential for noise pollution, air pollution or other nuisance from established industrial uses will not exceed acceptable environmental standards. The Planning Authority may seek a report from a suitably qualified person to identify and quantify sources of noise pollution, air pollution, or nuisance, assess the potential impacts on the proposed development and provide a series of recommendations to mitigate

the impacts of any pollutants insofar as possible (e.g., orientation and layout of dwellings, positioning of openings and insulation)

The design has been adapted accordingly to include buffering of the open space areas and improving the performance of the building envelope. A noise assessment has been carried out by RSK and accompanies this planning application.

'It may be necessary to consider improvements to the surrounding road and street network in conjunction with the Planning Authority, to calm traffic and improve pedestrian and cyclist access'

We submit that a new internal one-way street linking First Avenue to Cookstown Road is provided as part of this application to provide safe access and egress for vehicles to the site.

The proposed development also includes interim works to upgrade the surrounding cycle and pathways towards Belgard Luas Stop and south of the development site towards Tallaght Town Centre.

10.1.4 Healthcare Policies and Objectives

Appendix 11 of the South Dublin County Development Plan 2022-2028 presents the South Dublin Housing Strategy and Interim HNSA 2022-2028. Section 6.5 of the South Dublin County Council Interim Housing Strategy 2016 acknowledges that housing for older people is much needed within the jurisdiction of South Dublin County Council noting:

'The projected growth in the 65 and over age group forms the largest change up to 2031. For South Dublin, 65 years and over is projected to increase by 56.4% (17,447 persons) by 2031. This is a continuation of the trend from previous years where the cohort increased by 33% (23,053 to 30,925) between 2011 and 2016 which is an increased rate from the 29% (17,861 to 23,053 persons) between 2006 and 2011 Census. In total, a 73% growth over the 10-year period of 2006 - 2016. By 2031, the over 65yrs cohort will account for 15% of the total population. What is also notable is the increase in the 45 - 64 age cohort which together with the 65-age group represents 81% of the growth in South Dublin over the next 15 years.

It is noted that as the population ages across the county and the population grows in Cookstown there will be an increasing need for Transitional Care Facilities.

The following healthcare policies and objectives contained within section 8.8 of the South Dublin County Development Plan 2022-2028 are relevant and supportive of the proposed development in this case:

- **Policy COS6: Healthcare Facilities** - Support the Health Service Executive (HSE) in their aim to provide access to a range of quality health services, in line with Sláintecare and relative to the scale of each settlement and community, and facilitate other statutory and voluntary agencies, and the private sector in the provision of healthcare facilities and services, including the system of hospital care and the provision of community based primary care facilities appropriate to the size and scale of each settlement.
- **COS 6 Objective 1** - To facilitate the development of community-based care including primary health care centres, hospitals, clinics, and facilities to cater for the specific needs of an ageing population in appropriate urban areas in accordance with the Development Plan core and settlement strategy, consistent with RPO 9.23 of the RSES.
- **COS 6 Objective 2** - To promote healthcare facilities of an appropriate scale to be provided in new communities on a phased basis in tandem with the delivery of housing, in accordance with the phasing requirements of Local Area Plans and approved Planning Schemes and in locations that are accessible by public transport, walking and cycling.

It is submitted that the proposed transitional care facility contributes towards the HSE objective of providing a range of quality healthcare objectives. The proposed facility will help to support the needs of an ageing population and will be delivered in tandem with surrounding mixed use residential schemes in the Cookstown regeneration area, and a future mixed use residential development on the eastern portion of the subject lands.

The proposed development is accessible by public transport, walking and cycling and proposes interim upgrade works to the surrounding pedestrian and cycle infrastructure, connecting the development to public transport at the Belgard Road Luas stop and towards Tallaght Town Centre to the south of the development site.

10.1.6 Density and Building Height

The South Dublin County Development Plan 2022-2028 strategy regarding building height is adopted from guidance outlined in the National Planning Framework and Urban Development and Building Height Guidelines noting that building height should generally be increased subject to an assessment of the building performance criteria.

Appendix 10 of the SDCC Development Plan 2022-2028 is the South Dublin County Building Height and Density Guide. The following objectives outlined in the Development Plan relating to building height are relevant to the subject development:

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

It is considered in this case that the proposed Transitional Care Facility Building Height of 4 storeys above ground floor level is considered appropriate given that the subject site is located within the Cookstown regeneration area which features a block plan and indicated height objectives for the sites within the regeneration area. The subject development is consistent with the envisioned height for development at this location as outlined in the Tallaght Town Centre Local Area Plan 2020.

10.1.7 Transport Objectives

The following transport policies and objectives as outlined in the South Dublin County Development Plan 2022-2028 are considered relevant to the subject development:

- **Policy SM2: Walking and Cycling** - *Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets.*
- **SM2 Objective 2** - *To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced by promoting compact growth and permeability in the design and layout of new development areas.*
- **SM 2 Objective 6** - *To ensure that facilities for pedestrians and cyclists are designed in accordance with the principles, approaches and standards contained in the National Cycle Manual or any updated guidance and to promote off-road cycle infrastructure where feasible, subject to any design having regard to environmental sensitivities.*

It is considered that walking and cycling are prioritised as the primary modes of transport to be utilised within the site and in the surrounding area. Given the nature of the development as a Transitional Care Facility it is considered that there will be minimum pedestrian and cyclist movement arising from the proposed scheme outside of employee access and egress from the development. Disregarding this, the applicant is proposing interim upgrade works along Cookstown Road towards Tallaght Town Centre and extending northeast from the development site towards the Belgard Road Luas stop to provide and improve the surrounding pedestrian and cyclist infrastructure.

We refer to the Transport Assessment including Mobility Management Plan prepared by OCSC Engineers.

10.1.8 Energy

The following policies relating to sustainability and energy use as outlined in the South Dublin County Development Plan 2022-2028 are considered relevant to the subject development:

- **E2 Objective 2** - *To promote the generation and supply of low carbon and renewable energy alternatives, having regard to the opportunities offered by the settlement hierarchy of the County and the built environment.*
- **E2 Objective 1** - *To seek to reduce the reliance on fossil fuels in the County by reducing the energy demand of existing and new development.*

We refer to the Sustainability and Energy report prepared by JVT Consulting Engineers which outlines the sustainable and energy efficient measures that have been designed and incorporated into the scheme, in accordance with national building regulations and guidance.

9.2 Tallaght Local Area Plan 2020

The Tallaght Local Area Plan 2020 came into effect on 20 July 2020.

The policies and objectives of the LAP including the overarching objectives outlined in the urban framework for the area have been carefully considered and implemented in the overall design and layout of the proposed development.

The subject site is in Cookstown Industrial Estate, north of Tallaght town centre. The subject site is identified as being located within the Cookstown Neighbourhood and development parcel known as 'Cookstown CT-C' in the LAP. The site is proximate to bus transport services on Belgard Road, c.450m distant and Belgard Luas Stop, c.550m distant and employment hubs and local services. As such, the area is envisioned to be characterised as a "mixed-use residential and employment led neighbourhood with distinctive urban qualities and high levels of access to public transport and the urban centre, which will support existing businesses and additionally support the expansion of further small to medium size businesses and will continue to provide support for higher intensity employment."

The subject development proposes a use away from the traditional residential use in regeneration areas that will act as supportive infrastructure for an ageing population and the envisioned growing population at Cookstown as surrounding sites are developed. It is noted that a residential mixed-use application subject to a separate planning application will be proposed on the eastern portion of the subject site in the near future. The proposed development will complement this future application and provide an additional permissible land use on the site.

Key Objectives for Cookstown (CK):

Objectives for Cookstown

CK1: Emergence of a vibrant mixed use residential-led neighbourhood.

CK2: Create new urban block structure.

CK3: Deliver a mix of new open spaces, including provision of a new urban square or plaza at a central location at, or near, the junction of Cookstown Road and Second Avenue. The exact location, design, and delivery of this space to be progressed by SDCC in discussion with landowners in the area.

CK4: Improve legibility throughout the area and provision of new streets linking to nearby hubs and The Centre.

Demonstration of Compliance

Except for the café, the subject site has been largely vacant for several years. The proposed development will provide a Transitional Care Unit on the site, which will be followed by a future application for mixed use residential development on the eastern portion of the site. This will provide a broad range of uses on the site.

The development provides active frontages with strong urban edges to the north and along the internal access road. east. The layout of the development allows it to seamlessly integrate into the existing street at First Avenue and is consistent with the envisioned block plan layout for the site.

The proposal creates a new pocket park to the South of the development as well as an area of communal open space associated with the Transitional Care Facility. The pocket park can be utilised by both the public and future residents. The internal vehicular thoroughway facilitates future linkages to the North along First Avenue and to the East along Cookstown Road.

The open plan layout facilitates pedestrian connections through the site, benefitting future and adjoining residents travelling north of the site to Belgard Luas Stop and south towards the Town Centre.

The proposed development includes for interim upgrade works to the surrounding cycle and

CK5: Delivery of a variety of building types around Luas stops.

CK6: Support provision of a new primary school if deemed necessary by Department of Education and Science.

CK7: Utilising location as source of River Poddle, incorporating it into public realm and open space and green/blue infrastructure asset strategies.

CK8: Encourage and facilitate higher intensity employment uses and economic development.

CK9: Encourage design proposals to provide appropriate space to accommodate non-residential uses, particularly for existing businesses in the Cookstown area which can be appropriately accommodated in a mixed-use development with a substantial residential component.

CK10: 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.

pedestrian infrastructure improving links from the development site to the Belgard Road Luas stop and Tallaght Town Centre to the south.

The 5-storey total height of the development is in line with the envisioned height for development at this location as outlined on the Block Plan for the Cookstown Regeneration Area

This is not applicable to the subject application. A new school is identified in the Town Centre neighbourhood, north of Belgard Square North.

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The residential development supports adjoining employment uses in the nearby business parks, particularly at Tallaght Hospital

The proposed development provides a non-residential use on the western portion of the subject site. It is noted that the development on the site will be consolidated subject to a separate future planning application for a mixed-use residential development on the eastern portion of the site.

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Objectives Specific to Development Parcel ‘CT-C’

The subject development is in land parcel ‘CT-C’ as outlined in the Tallaght Town Centre Local Area Plan 2020. The following infrastructure requirements are outlined in the plan to be required for the overall Cookstown area. There are also infrastructure objectives specifically outlined for land parcel ‘CT-C’:

Cookstown		
Infrastructure Requirements for the overall Cookstown area		
Physical Infrastructure	Physical	Enhanced public realm, including improved connectivity to public transport nodes, to east and to town centre to the south. Examine alternative routing for HGV traffic.
		Provision of Water and Wastewater infrastructure on a pro rata basis in accordance with requirements of Irish Water and SDCC.
		Provision of Sustainable Urban Drainage System (SUDS) measures on a site by site basis to manage surface water run-off.
	Open Space	New urban square (‘Cookstown Urban Square’) as a central and accessible amenity for the northern Cookstown lands to be developed at, or in close proximity to, the junction of Cookstown Road and Second Avenue.
Social Infrastructure	Community (including arts, culture and faith)	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.
Associated Infrastructure	Childcare	The indicative long-term unit growth for the area would generate a requirement for 360 spaces ¹ . 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.
	Health	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.
CT-C		
Physical Infrastructure	Physical	Upgrade / enhancements required to Second Avenue in order to facilitate development within CT-C, including public realm improvements, pedestrian, cyclist linkages and potential alternative routing for HGV traffic.
		Upgrade / enhancements required to Cookstown Road in order to facilitate development within CT-C, including public realm improvements, pedestrian, cyclist linkages and potential alternative routing for HGV traffic.
		Enhanced pedestrian and cyclist linkages to Belgard and/or Cookstown Luas Stop.
		Removal / undergrounding of 110kv overhead power lines at northern section of Cookstown, linked to proximity and set back required by ESBI on relevant sites.
		Provision of Belgard Square North Link Road to facilitate direct link to Town Centre from Central Cookstown.
		Upgrade and enhancement landscaping works to open space alongside Luas line as part of proposals for development along the northern boundary of CT-C, in consultation with TII and SDCC Parks Department.

The proposed development will realise a number the envisioned infrastructural upgrades for land parcel ‘CT-C’ and will provide interim upgrade works to the pedestrian/ cycle infrastructure connecting the site to the Belgard Luas Stop to the Northeast of the development site and south of the site towards Tallaght Town Centre.

10.2.1 Land Use Mix/ Urban Function

The Plan envisages the regeneration of the Cookstown neighbourhood to a mixed-use residential and commercial quarter, in conjunction with the development of opportunity sites located in The Centre neighbourhood.

Cookstown is defined in the LAP as *“An attractive mixed use residential led neighbourhood with distinctive urban qualities and high levels of access to public transport and the urban centre.”*

The surrounding Cookstown area, zoned regeneration, generally comprises low-rise industrial and commercial uses with low density employment/underutilisation and in some cases vacancy. The LAP proposes more intensive uses in these transitional and transformational areas to accommodate higher density residential and employment uses.

This is supported by the site’s location within the 500m catchment of Belgard Luas Stop and proximity to enterprise/employment uses associated with Tallaght University Hospital and TU Tallaght Dublin Campus for example. Healthcare is a permissible under the ‘REGEN’ zoning and compatible with the existing adjoining uses such as Tallaght Hospital and future mixed use residential developments.

The proposed development will positively contribute towards the LAP vision of providing development in this area of Cookstown and will contribute to the growing sense of community at this location. The changing nature of the site in proximity to existing commercial premises is acknowledged. Careful consideration has been afforded to the layout and orientation of the proposal and separation distances between adjoining sites. The proposed Transitional Care Facility will offer a typology of development that is permissible on the site and currently not provided for in the Cookstown Area.

Furthermore, the adjoining processes are not considered to contribute to significant air pollution or general nuisance given their classification as commercial/light industrial uses – The surrounding sites usage is primarily car repair shops with STM garage and Diamond Cut wheel refurbishment to the South of the Site, The Smart Repair Centre to the East, Auto Depot Tyres to the North and Autodent Repair Centre and Richard Nolan Civil Engineering to the East. No heavy industry uses that could potentially generate noise/air pollutants adjoin the site.

The site is set-back c.6.5m from the kerb/road edge with landscape buffering along the site perimeter to aid acoustic attenuation. Moreover, glazing and ventilation attenuation systems will be used throughout the scheme to mitigate against any noise impacts arising from road traffic and/or commercial/industrial activities. We invite a suitably worded condition relating to noise mitigation measures.

10.2.2 Intensity of Development

The LAP advocates higher and medium intensity areas located *“primarily around the existing retail and administration centre, that is, The Centre and the Luas Stations on the Cookstown and Belgard Roads.”*

It is considered that the provision of a 131-unit Transitional Care Facility offers an appropriate intensity of development on the site. The proposed facility complies with key development standards and the envisioned height and layout for new buildings at the subject location as outlined in the Tallaght Town Centre LAP. The facility provides a use type which is permissible in regeneration areas and is in close proximity to Tallaght Hospital.

We refer to the architect’s design statement and area schedules prepared by EML accompanying this application for more information regarding the intensity of development as informed by the plot ratio, height and height of the development.

10.2.3 Plot Ratio

Having regard to the Cookstown Neighbourhood and specifically land parcel CT-C outlined in the LAP, the plot ratio range applicable to the subject site is 0.75 (minimum) - 1.0 (maximum).

The proposed plot ratio for the site is 1.78 based on a development site area of 0.3784 ha. This area does not include the public open space area. Proposals that exceed plot ratio and building height standards need to deliver significant public gain, to be assessed on a **case-by-case basis, by the Planning Authority**. It is noted that a plot ratio of 1.8 was deemed acceptable under Ref. 306705-20 for the Former Gallagher site.

The previous reasons for refusal regarding plot ratio will be addressed by the overall development on the subject site. It is noted by the applicant that a mixed-use residential development on the eastern portion of the site will be lodged subject to a separate future planning application. The total developable site area associated with the subject scheme in combination with the future application on the eastern portion of the site will be 1.162ha.

The total GFA of the proposed Transitional Care Facility is 6743sq.m. The preliminary GFA for the future application on the eastern portion of the site is 9614 sq.m. In combination, the total GFA of the subject application and future mixed use residential application will be 16357 sq.m (it is noted that this is subject to change).

This total GFA of 16357 sq.m on a developable site area of 1.162ha will give a preliminary plot ratio of 1.40 for the overall development site.

The preliminary overall plot ratio of 1.40 for the overall development site represents a reduction in plot ratio from the figure of 1.49 that was associated with the previous application on the lands lodged to SDCC (SD21A/0196).

“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.

In response to the above policy objectives of the LAP the proposal provides the following significant public gains:

- The dedication of part of the site for public open space including a pocket park for above the standard 10% requirement for public open space on site which will potentially be delivered in advance of the associated residential development on the eastern portion of the site, which will be subject to a separate future planning application.
- Full permeability through the site and creation of a new one-way street with pedestrian and cyclist links to the pocket park.
- The provision of a new Transitional Care Facility is a significant gain to the social and community infrastructure with capacity of 131 beds. It is noted there are no similar facilities at or near Tallaght University Hospital.
- Public realm improvements including reduction of kerb heights, provision of widened footpaths, on-street parking and significant tree planting along Cookstown Road and First Avenue help to transition this important regeneration site from its former industrial use to a mixed-use development.
- Significant interim upgrade works are proposed as part of the development to upgrade the surrounding cycle/ pedestrian infrastructure linking the development site the Belgard Road Luas stop and south towards Tallaght Town Centre.

10.2.5 Healthcare

Section 5.3.4 of the Tallaght Town Centre Lap notes the following in relation to the provision of healthcare facilities:

‘It is policy of the plan to support and encourage the expansion of healthcare services at Tallaght Hospital, liaise with the Health Service Executive (HSE) to ensure that the scope of services provided

are adequate to meet identified local service gaps and to support the provision of healthcare services in Tallaght Town Centre to cater for the future needs of the projected population in the area (Objective CF 5)'.

The proposed development supports the above policy providing a Transitional Care Facility on appropriately zoned lands close to Tallaght Hospital and Tallaght Town Centre. The proposed use will support an ageing. Population and the envisioned growing population at Cookstown.

10.2.6 Urban Form

The urban form and block layout identified in the LAP, identifies Cookstown Road to the East as a Secondary Route and First Avenue to the North as a Tertiary Route.

Given the complexities associated with multiple landownerships and master planning, it is impossible to fully faithfully comply with the urban form outlined in the LAP. It is understood at this time that several sites surrounding the subject site have been earmarked for redevelopment. The proposed layout and masterplan for adjoining lands is an appropriate and realistic design approach to future development.

It is submitted that the now proposed Transitional Care Facility and associated Pocket Park and roads are in line with the envisaged Block Plan layout for the site as outlined in the Tallaght Town Centre Local Area Plan.

The site location approximately 100 metres North of the future proposed location of Cookstown Urban Square at the Junction of Cookstown Road and Second Avenue means that the development will be ideally located adjacent to another amenity area which will be developed as part of the regeneration of the Cookstown area. It is noted that the eastern portion of the subject site

The proposed scale and layout does not inhibit the use of adjoining sites nor preclude their future development. The proposed Transitional Care Facility is 5 no. storeys in height and located on the western portion of the site.

The new internal one-way street with access to Cookstown Road facilitated increased building heights given the nature of this higher order street with generous street widths and enhanced pedestrian facilities.

In accordance with the principles of Section 2.6.3, all sides of the proposed buildings provide active frontages with no featureless gables, therefore activating the surrounding streetscapes and publicly accessible spaces.

Pedestrian access is prioritised throughout the scheme design, as such, car parking is provided at intervals at surface level to either side of the internal one-way street.

The design materials and finishes establish a high-quality environment that will be a benchmark for the development of the wider area. Materials comprise selected brick finishes and metal cladding with quality contemporary fenestration. We refer to the architectural drawings and design statement prepared by EML architects which provides details on the palette of materials used.

10.2.7 Access and Movement

The site is bounded by Cookstown road to the East and First Avenue to the North.

Cookstown Road joins Belgard Road to the East of the site. Belgard Road (R113) is identified as a primary route connecting the N81 at Tallaght with the N7 at Newlands Cross/Naas Road. From here, the R113 known as the Fonthill Road (North and South) connects with the N4 at Liffey Valley. This important route runs parallel with M50 connecting key employment areas. Furthermore, the site is located with the 500m catchment of the Luas at Belgard Luas Stop. Belgard road is located approximately 450 metres or a 6-minute walk from the site currently. As Cookstown is zoned for REGEN it is likely that this walking time will be decreased further as adjacent sites to the north and northeast of the site are developed and new connections are proposed as Cookstown becomes a mixed-use residential neighbourhood as per the vision for the area outlined in the Tallaght Town Centre Local Area Plan.

First Avenue is used primarily as an access road for the light commercial industrial units surrounding the site. It is not used as a throughway however there is an access route from First Avenue to Second avenue through the carparking areas of industrial warehouses located to the west of the site.

Having regard to the above, the proposed development as it relates to access, and movement is wholly in accordance with Objective AM2 of the LAP.

Objective AM2: It is an objective of the LAP to encourage the principle of filtered permeability at suitable locations throughout the LAP area.

Vehicular access to the site will be via a new internal one-way road entering the site along first avenue and exiting onto Cookstown road.

The creation of the new vehicular access and egress points along First Avenue and Cookstown Road will involve upgrades to the pedestrian footpaths along First avenue and Cookstown Road. Any upgrades to these streets to facilitate the new development will be designed, in accordance with the requirements of the Design Manual for Urban Roads and Streets (DMURS) (2013), the National Cycle Manual (2011) and the Guidelines for Setting and Managing Speed Limits in Ireland (2015).

The subject site prioritised vehicular travel, given the nature of the previous commercial use on site. This is evidenced in the existing wide vehicular access points located along Cookstown Road and First Avenue, and the volume of existing Surface level car parking. The proposed Transitional Care Facility use seeks to prioritise pedestrian access across the site.

The site now prioritises the pedestrian, incorporating a one-way internal street for vehicular traffic that features a sharp corner and multiple areas of parking with an aim to slow down vehicles travelling through the development and create a safer pedestrian space.

All necessary footpath and road improvements necessary to facilitate the proposed development along First Avenue and Cookstown road will be incorporated and have regard for the future LAP proposal to connect Belgard Road with Cookstown Road. As part of this development proposal interim works are proposed to the surrounding pedestrian/ cycle infrastructure to improve connections to the Belgard Luas Stop and south along Cookstown Road toward Tallaght Town Centre.

The proximity to employment centres and high-quality public transport, as well as the nature and use mix proposed, justify the reduced rate of parking provided as part of the proposal, with 32 no. spaces being provided total, 17 associated with the subject proposal and the remaining 15 being associated with a future mixed use residential development on the eastern portion of the subject site.

10.2.8 Open Space/Public Realm

In accordance with Section 2.7.2 of the LAP, public open space is integrated within the overall open space and green infrastructure strategy for the LAP area. The public open space pocket park area, associated with future residential development on the site, to the southwest of the site will allow for integration with a larger public open space area that will be created when surrounding sites are developed in the future.

The central communal courtyard associated with the Transitional Care Facility is a key feature of the scheme and will allow for residents of the facility to enjoy an outdoor area while still within the safety of the Transitional Care Facility.

Children's play areas are provided within the pocket park area associated with the scheme and include spaces that facilitate natural play and a soft play area with equipment and seating, in accordance with Section 5.3.3 of the LAP.

The area of public open space for the future mixed use residential application is being delivered in tandem with the now proposed Transitional Care Facility, as it is located adjacent to the care facility in accordance with the block plan for the site as outlined in the Tallaght Town Centre Local Area Plan. Delivering this area of public open space at this stage of development of the overall site will allow the entirety of the western portion of the site to be comprehensively addressed in a single phase of development, with

development of the eastern portion of the site to be addressed subject to a future separate planning application for a mixed use residential scheme.

The quantum and size of the outdoor public open space area areas (c.1,268sqm in area) exceeds the requirements of the LAP. The space was designed with appropriate planting and screening to create an additional sheltered amenity space. All communal and public open spaces are west, south, or east facing, maximising solar gain throughout the year.

The landscaped areas vastly improve the level of vegetative cover on site. The hierarchy of spaces created in the private, communal, and public open spaces enhance species variation, thus promoting biodiversity on site.

“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.”

An area of public open space of c. 1,268sqm in the form of a pocket park is provided as part of the proposed development, which equates to c. 10% of the site area. This is located in the southwest corner of the site adjacent to the Transitional Care Facility.

Easily accessible to all residents, the central and communal public open spaces benefit from the passive surveillance of several the windows associated with the Transitional Care Facility.

10.2.10 Energy Efficient Design

In accordance with Section 7.4.1 of the LAP, the development has been designed to achieve a high level of thermal efficiency with highly insulated building fabric and optimising passive solar gains. The design ensures all apartments have a very high energy performance. Energy requirements will be derived from renewable sources, including PV panels at roof level of all buildings.

10.2.13 Implementation and Sequencing

Section 8.0 of the LAP states the following in relation to phasing and sequencing of development:

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

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

Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved or where proposals are brought forward for sites of 2 hectares or more within the regeneration lands that comply with the Urban Framework of the LAP.”

Section 8.2.1 goes onto state development should:

1. *Demonstrate a clear transition towards a more urban form of development and a traditional street network in accordance with Chapter 2 and 3.*
2. *Address connectivity and linkages in the area and demonstrate that the development of the site would not give rise to isolated piecemeal pockets of development with residential uses that are disconnected from public transport, public realm, retail, amenities and/or other residences.*

3. Residential development should be very carefully designed at the lower levels in particular adjacent to existing busy roads, and/or roads that are subject to significant movements by Heavy Goods Vehicles (HGVs) without demonstrated or proposed improvements to upgrade the street network in accordance with the Plan.
4. Demonstrate that the potential for noise pollution, air pollution or other nuisance from established industrial uses will not exceed acceptable environmental standards. The Planning Authority may seek a report from a suitably qualified person to identify and quantify sources of noise pollution, air pollution, or nuisance, assess the potential impacts on the proposed development and provide a series of recommendations to mitigate the impacts of any pollutants insofar as possible (e.g. orientation and layout of dwellings, positioning of openings and insulation); and
5. As part of any planning application for redevelopment, the developer shall demonstrate a rationale for the site selection of the proposed development in relation to existing, permitted and proposed development. In general, integration with adjoining development and/or the urban form of the established Centre will be required to prevent piecemeal or premature development. Developers should sequence the delivery of Cookstown radially from the Town Centre, Luas stops and the perimeter.”

The subject proposal is compliant with the above objectives having regard to the following:

- The proposal layout creates a new distinct urban form of development with Frontages to the boundaries First Avenue and the internal access road. T-shaped layout of the Transitional Care Facility allows a courtyard to be contained along the western boundary of the site for resident use. The Layout of the building on the site means that there is a potential to redevelop surrounding adjacent sites as residential developments which mirror the proposal. The internal one-way street creates a new connection for vehicles and pedestrians from First Avenue to the North of the Site to Cookstown Road to the East of the site, and runs through the site, passively overlooked by the Transitional Care Facility.
- The proposal is consistent with the envisioned block layout and usage for the area. The proposal sits comfortably into the site and its general form, layout, public open space, access routes will facilitate the development of surrounding sites with ease and in a comprehensive and considered manner. The proposal is coherent with the vision for the area as a mixed-use residential neighbourhood, providing a Transitional Care Facility on the western portion of the subject lands that will be followed by a separate application for mixed used residential development on the eastern portion of the site.
- This proposal is accompanied by appropriate noise assessment and conclude that the existing industrial processes on surrounding sites will not impact the residential amenity enjoyed by future occupants. Furthermore, the adjoining processes are not considered to contribute to significant air pollution or general nuisance given their classification as commercial/light industrial uses – STM garage and Diamond Cut wheel refurbishment to the South of the Site, The Smart Repair Centre to the East, Auto Depot Tyres to the North and Autodent Repair Centre and Richard Nolan Civil Engineering to the East. No heavy industry uses that could potentially generate noise/air pollutants adjoin the site.
- The property has been vacant for several years. The proposed development is less than a 6min walk from the Belgard Luas stop and bus services operating on Belgard Road.
- The wider industrial area is undergoing significant change at present. We note that a number of granted permissions for upgrade works to the surrounding road network and mixed-use residential development have commenced construction recently.

10 Conclusion

We invite the Planning Authority to consider the proposal now put forward in the application documents attached herewith. We note the following key summary points:

- It is our considered view that the proposal now submitted delivers on the ambitions of relevant National Guidelines, and we ask that the Planning Authority have regard to this in their consideration of the proposal.
- The proposed Transitional Care Facility is acceptable in principle under the regeneration zoning as a healthcare use.
- The proposed development contributes significant planning gain to the surrounding community, providing a Transitional Care Facility close to Tallaght Hospital that will contribute towards supporting a national ageing population and an envisaged growing population in the Cookstown regeneration area as the area moves away from its traditional industrial uses and is regenerated as a mixed-use residential neighbourhood.
- The site is opportunely located, in terms of proximity to public transport and local amenities/services, to deliver much needed residential accommodation. The proposal significantly improves accessibility across the site leading to the partial pocket park to the southwest of the site.
- The design and layout of the proposal maximises the development potential of the site creating attractive internal and external amenity areas while respecting the development potential of adjoining sites through thoughtful urban design, generous set back distances and appropriate boundary treatments.
- The proposal is consistent with the block layout and urban form envisaged for the subject site as outlined in the Tallaght Town Centre Local Area Plan 2020.
- The proposal ameliorates the existing industrial and commercial nature of the site through extensive upgrade works including footpath widening, on-street parking, tree planting, lighting plans and lowering kerb heights etcetera. The quality of the public realm is wholly transformed and enriches the character of the area. The proposal includes extensive interim upgrade works to the surrounding pedestrian and cycle infrastructure connecting the site to the Belgard Luas Stop and south towards Tallaght Town Centre.

We ask that the Planning Authority to consider these points in their review of proposals, and we trust that they will view this pre-planning application as a positive move towards delivery of sustainable development on zoned lands.

