

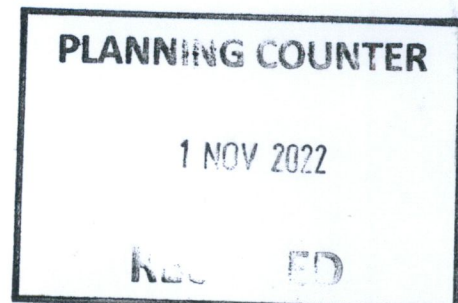
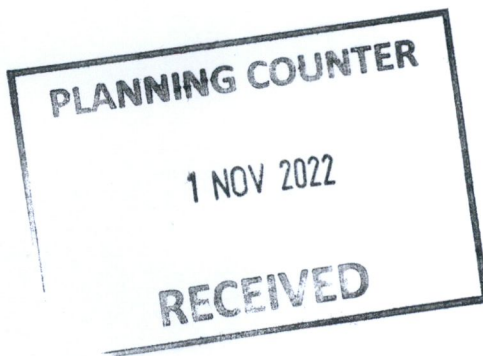
Response to request for Additional Information

Planning Authority: South Dublin County Council
Applicant: Better Value Unlimited Company

Development: Extension, Change of Use and alterations to Kilnamanagh Shopping Centre; A two storey extension is proposed along the centre's eastern elevation (total GFA increase of 2,336sq.m); Change of Use of the first-floor retail area (last used by Dunnes Stores as textile sales space) which will be extended and subdivided to provide for two new non-retail, service units; Unit 1 will extend to c.1,411sq.m for use as a health centre and Unit 2 will extend to 790sq.m for use as a gym; Removal of condition 3 of PA Ref: SD06a/0095 to allow for the increased net sales area to allow for the increase in net comparison sales space at ground floor level; New entrance ramp and steps at the north of the extension; The southern lobby entrance into Dunnes Stores will be demolished and replaced with a new glazed lobby entrance; New walkway canopy generally on the north and south elevations; New ramped access next to existing pedestrian entrance steps on Mayberry Road; Reconfigure existing entrance to Treepark Road including revised parking layout generally around the east side of the building to allow for an adjusted, one-way, system around the centre; Car parking, as a result of the extension, will be reduced; Four electric vehicle parking spaces; Covered cycle parking; New enclosed service yard wall and gates to existing service area on the west side of the centre; New signage (including illumination) proposed to elevations including two Totem signs; Recladding on elevations. Additional landscaping treatment generally around the east side of the centre arising from the amendments to the car park. Landscaping works and all drainage works including SUDS measures; All other ancillary works to facilitate the development.

PA Ref: SD22A/0316

Date: 25 October 2022



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Accompanying Documents and Plans

CSR Landplan

- Landscape Design Report Rev A L
- Landscape Masterplan Drawing No 22146-2-100 Rev B

PDA

- DS Kilnamanagh Design Statement - RFI - REVA - 25.10.2022
- PDA_DS-69-EX-01-REVA Existing Site Layout
- PDA_DS-69-PL-09-REVB Proposed Site Layout
- PDA_DS-69-PL-10-REVA Proposed Ground floor Plan
- PDA_DS-69-PL-100-REV00 Mobility Plan
- PDA_DS-69-PL-109-REV00 Site Plan - Future Solar Panels
- PDA_DS-69-PL-112-REV00 Roof Plan - Future Solar Panels

ORS

- Civil Services Layout 220063-ORS-ZZ-00-DR-C-400 P03
- SUDS Management and Maintenance Plan: 220063-ORS-XX-XX-RP-13a-002

Item 1: Design Approach.

The County Development Plan seeks active street frontage, well designed streetscapes, and good quality public spaces in district centres. The applicant has provided a Design Statement, but ultimately this does not address the design-related policies and objectives contained in the County Development Plan and quoted above in this report.

The applicant should be requested to provide a revised Design Statement as additional information and, as necessary, revise the plans for the scheme, to address the following policies:

- Policy QDP1, and in particular objectives 2 and 4.
- Policy QDP2 and the Plan Approach
- Policy QDP6 Public Realm, in particular objective 3 as it relates to environmental quality, urban design and safety.
- Section 5.2.6 guidance on street frontage.
- Policy QDP7 objectives 2 and 3, in particular in relation to the need to increase activity on the building frontages.

The Planning Authority is concerned that the extension to the development intensify development on the site without sufficiently improving the public realm or accessibility of the site, and that a considered approach to healthy placemaking is required.

On a general note this is an application to extend an existing, long established District Centre. The application includes internal changes such as the relocation of retail space from first to ground floor and the inclusion of a medical centre and gym as well as external improvement to parking; access for cars, cyclists and pedestrians, whilst retaining links to the local church and school and wider community. Enhancements and upgrades accord directly with District Centre objective EDE12 Objective 1.

***EDE12 Objective 1:** To promote the development of District Centres as sustainable, multifaceted, retail led mixed use centres and support their enhancement and upgrade.*

To that end, much of the guidance set out above is to be applied to new, fresh developments on cleared brownfield or green field sites. Such sites give the freedom to design in public realm, shared streets etc. For example QDP6 relates to Public Realm which is defined in the Council's own pre planning guidance (Note 9) as:

The 'public realm' is a collective term for the spaces between buildings where the general public have access. The public realm of any proposed development relates to that part of a proposal that is intended to be publicly owned or maintained and includes streets, pathways, rights of way, parks and open spaces and any public and civic building and facility.

Fundamentally the public realm in this location is enshrined in the public streets, connections (e.g. to the Church and national school (St Kevins) and the vast areas of public open space that are a short minute walk from the northern entrance of the shopping centre.



Figure 1: Context Image showing extent of the community uses and green spaces and wider public realm to the north of the application site.

Notwithstanding the above PDA has updated their Design Statement to have regard to the items raised in the Item 1.

Item 2: Additional Uses.

It would be beneficial for the applicant to provide, by way of additional information, an explanation as to whether they have considered, and if so why they have excluded, other uses which the County Development Plan promotes the delivery of in district centres, namely:

- Residential development as part of a mixed-use centre;
- Childcare services
- Place of worship or multi-faith facility.

Any diversification or consolidation of services on the site, or increase of local residential density, would improve its standing as a local facility within a walkable neighbourhood, and improve the aggregate demand within the immediately served area.

Response:

Overall this application is for a modest extension to an existing, long established shopping centre, serving a long established district with extensive housing development in the immediate area. The Council is therefore asked to assess the application on that basis.

It is also apparent from the planning report prepared by this office that the application directly addresses the objectives as they are set out in the new Development Plan for District Centres. The table below sets out the response we previously provided to general retail and district centre specific policies.

Objective	Response
EDE8 Objective 3: To support new retail provision in the County to meet the needs of the County's population and to direct new retail floor space into designated retail centres in accordance with the County Retail Hierarchy, so that centres can maintain and expand their retail offer.	Planning permission for this development will assist in generally improving the diversity of offer at this location and in accordance with the role of Level 3 centres (see above) increase the diversity of localised services to the benefit of the districts population. The enhanced diversity of the centres offer will also help to sustain the retail offer.
EDE8 Objective 4: To support the viability and vitality of the existing retail centres in the County, in particular town, village and district centres and to facilitate a competitive and healthy environment for the retail industry, while reinforcing sustainable development.	This development will directly support the viability and vitality of this designated centre.
EDE8 Objective 6: To facilitate and provide for, the refurbishment and replacement of obsolete floorspace and promote the use of vacant floorspace.	This objective is directly applicable to the proposed development. Covid 19 has changed how retailers and customers use their space. The use of the upper floor for clothing became obsolete during the pandemic. This application offers an opportunity to reuse and expand the first floor space for a more diverse range of district services and enhance the retail offer of the Dunnes stores unit at ground floor level.
EDE8 Objective 7: To consolidate the existing retail centres in the County and promote town, village, district centre and local centre vitality and viability through the application of a sequential approach to retail development.	This centre is a defined district centre and preferred location for new retail development. Therefore, it complies with the sequential approach.

<p>EDE8 Objective 8: To direct new major retail floorspace in the County to designated centres at the appropriate level within the retail hierarchy, and to further direct major retail development in designated centres into the Core Retail Areas.</p>	<p>The planning application seeks to relocate retail sales space within a designated centre. This fully accords with the sequential approach.</p>
<p>EDE8 Objective 9: To support place-making enhancements and upgrades to our villages and centres to create vibrant and attractive places for people and businesses.</p>	<p>The application includes placemaking improvements and enhanced elevations as set out in the accompanying plans and design statement.</p>
<p>District Centre Specific Objectives</p>	
<p>EDE12 Objective 1: To promote the development of District Centres as sustainable, multifaceted, retail led mixed use centres and support their enhancement and upgrade.</p>	<p>The nature of the extension including the change of use elements will directly add to the multi-faceted profile of the centre. The centre remains retail led. The development is an <i>enhancement and upgrade</i> of the centre.</p>
<p>EDE12 Objective 2: To ensure that the scale and type of retail offer in District Centres is sufficient to serve a district catchment, without adversely impacting on or drawing trade from higher order retail centres.</p>	<p>The nature of the retail offer proposed here does not change from that permitted in 2006. The Health centre and gym are appropriate lower level, local services that will provide more people with ease of local access and ensure that on trip to this centre can service a number of purposes. Higher level centres such as Tallaght have a vastly more diverse range of services and depth of service and retail which will not be impacted by this application.</p>

Furthermore, the Planning Authority has not pointed us to a specific objective or policy beyond those outlined by ourselves in the above table.

Without prejudice to the above analysis we comment on the suggested landuses below:

As regards the other uses. We note the applicant has included its application the health centre and gym. There is market interested for these uses at present and so they are considered viable. Our concerns with the suggested uses are as follows:

Residential:

- Residential is not a use that can be in any way easily fitted onto the site given the massive challenges and impacts on the operation of the centre and also the inevitable loss of substantial car parking. The building itself was not designed, structurally to accommodate new floors above so that is not a reasonable option.
- The entire centre would require complete demolition and a fresh start to coherently accommodate new residential.

- Residential may be a consideration at a point in the future as part of a comprehensive redevelopment plan but it is not considered viable as part of this planning application.
- In any event, the current centre services a substantial residential catchment many of whom can walk or cycle to the centre. The provision of better connections with the wider area and more cycle parking will enhance these modes.

Creche:

- Provision of a creche is not appropriate at this centre given the need to provide external play space for children in a manner that is safe and connected to the creche itself.
- There is St Kevins Childcare and Early Steps Pre-School located at St Kevins beside the application site.
- There are already a vast number of creche and childcare services in the immediate and wider Tallaght area that already service this market as indicated below.

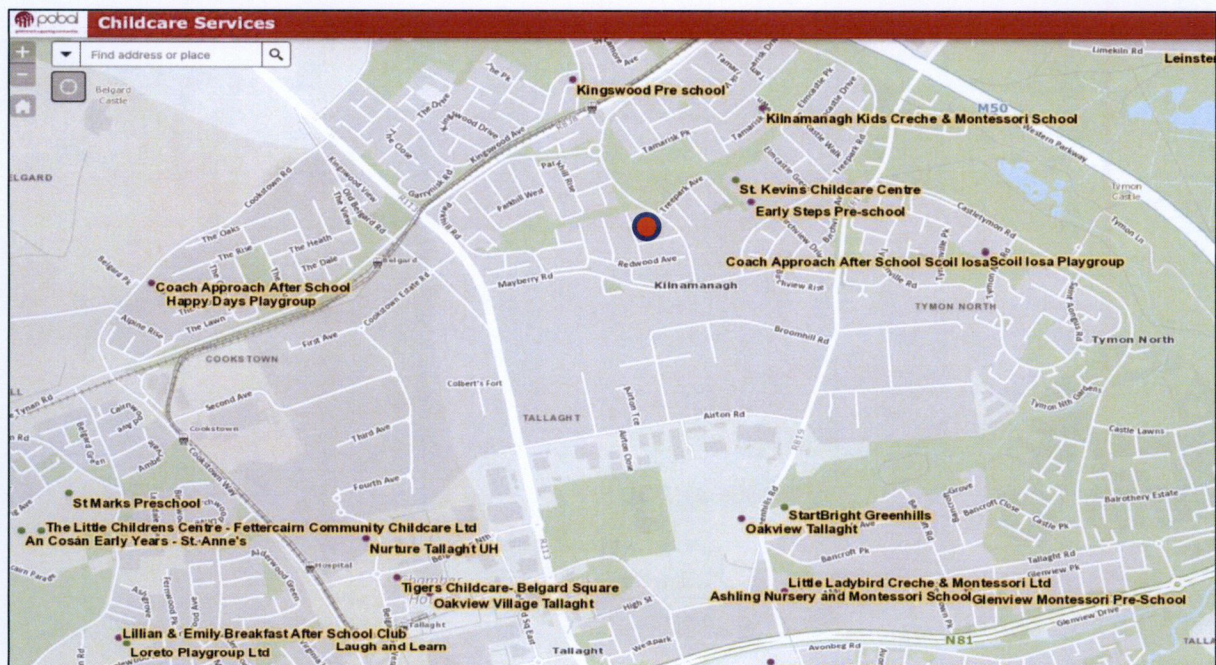


Figure 2: Locations of Creches in wider area.

Place of Worship:

- This has not be considered viable, evidentially, due to the existence of St Kevin's Church which is located to the east of the District Centre and to which there is already pedestrian link and pedestrian crossing linking the two land uses.

The application already makes provision for two new land-uses which is entirely in keeping with the prevailing retail and district centre specific objectives.

Item 3: Pedestrian and Cyclist Facilities.

The applicant is requested to submit a revised layout of not less than 1:200 scale showing:

- (a) clear pedestrian walkways and crossings from all access points to the main entrances.
 - (b) cycling facilities and parking as per DMURS and the County Development Plan. The applicant is requested to provide justification and a breakdown of the bicycle parking to be provided. Minimum Bike Parking Rates should be calculated using Table 12.23 of the SDCC Development Plan 2022- 2028
- (2) The applicant is requested to submit a revised layout showing provision of 15 No. EV car parking spaces and 20 No. Mobility Impaired parking spaces.
 - (3) The applicant is requested to provide justification and a breakdown of the bicycle parking to be provided. Minimum Bike Parking Rates should be calculated using Table 12.23 of the SDCC Development Plan 2022-2028 (repeated from item 1b).

Please note that item 3(3) is a repeat of item 1(b) so we will deal with them in order as follows:

Item 3(a)- Pedestrian Walkways and Crossings

See Architects Proposed Site Layout Mobility Plan Drawing (DS-69-PL-100) @ 1:200 scale showing dedicated pedestrian walkways and routes provided.

Item 3(b)- Bicycle Parking Facilities

The SDCC Development Plan clearly refers specifically to "**New Development**". Whilst there are new elements, and refurbishment, this does not represent a new development, being a long established Centre.

Notwithstanding the change in Bicycle Parking provision associated with the change-of-use of the Textile Area (Comparison) to Gym/Medical uses, in this case the "New Development" comprises a 2,657m² GFA extension to the established centre.

There is not expected to be an increase in staffing levels with the proposed retail alterations within the development, and therefore the application of the SDCC Development Plan Parking Standards would require an additional 51 Bicycle Parking Spaces (in effect 1:50m² GFA applied to the extension). The GYM and Medical Centre are expected to create c30 FTE Jobs, and if we apply the staffing bicycle parking ratio of 1:5 to these, this results in a requirement for 6 Bicycle Parking Spaces for new employees. **This results in a total requirement for 57 New Bicycle Parking Spaces** for the new elements of the development.

In this case, as there are currently ZERO bicycle parking spaces provided at the site, there are therefore an additional 78 Bicycle Parking Spaces being provided (68 traditional spaces and 10 cargo bike spaces). This exceeds by 23 spaces the minimum requirements of the SDCC Development Plan for Bicycle Parking, strictly applying the Standards to the new development elements.

However, in the event that SDCC require additional spaces over and above the 78 additional spaces provided, these can be added in locations to be agreed at Compliance stage (in the event of a grant of planning permission).

Dunnes Stores will also react to customer demand and will provide additional bicycle parking should the need arise.

Item 3(2)- EV and mobility spaces

Please refer to the attached, revised Site Layout Plan which indicates the installation of the relevant spaces. The proposed development now has 20 EV space and 20 Mobility impaired spaces.

Item 4: Parking EV spaces/Mobility

The applicant is requested to submit a revised layout showing provision of 15 No. EV car parking spaces and 20 No. Mobility Impaired parking spaces.

Repetition of point 3. Please refer to the response in Item 3(2) above.

Item 5: Parking

The County Development Plan seeks area-based parking caps, appropriate parking arrangements for motorcyclists and scooters, and measures to encourage efficient turnover of spaces within district centres. The applicant should provide additional information to show compliance with Policy SM7 of the County Development Plan, in particular objectives 3, 6 and 7.

In terms of Car Parking provision, the Shopping Centre, when originally built was subject to **Minimum** Car Parking Standards, guidance which has now changed to a **Maximum** provision, in accordance with principles of sustainability, together with requirements for promoting alternatives to the private car.

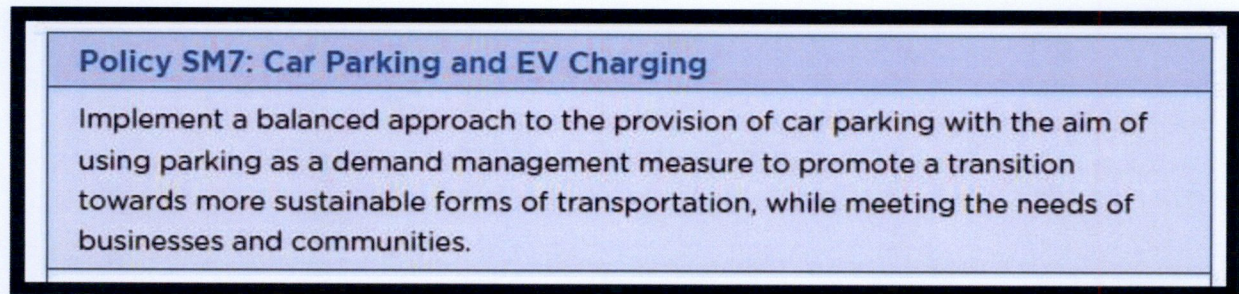


Figure 3: Policy SM7

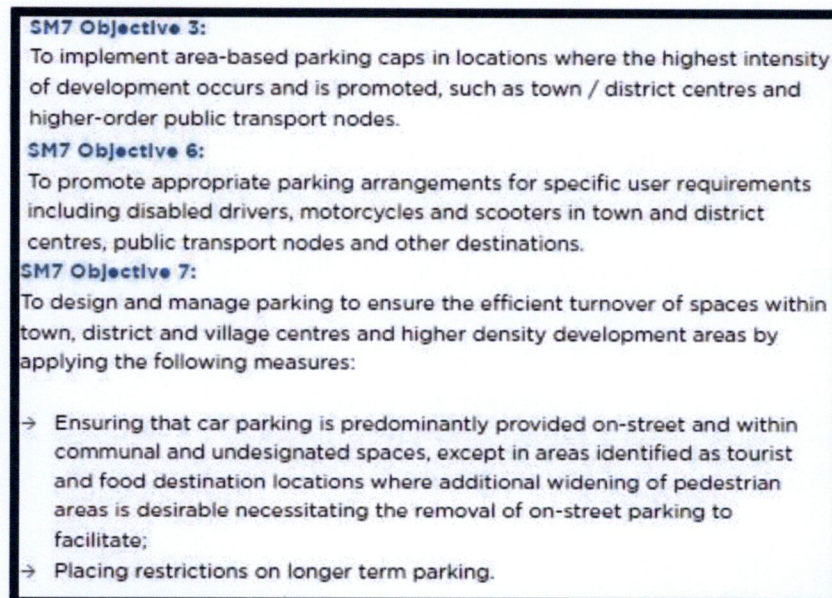


Figure 4: Policy Objectives.

In terms of the SDCC Development Plan, the Maximum Parking standards are set out in **Table 12.25** of the Plan. The SDCC Development stipulates that Developments within 800m of a LUAS Stop are within 'Zone 2' for assessment purposes. **Figure 5** below,

a Google Streetview extract, confirms that the site is within 600m on Kingswood LUAS Stop, and is therefore within **Zone 2** for assessment purposes.



Figure 5: 600m Distance of Kingswood LUAS Stop

The site is therefore demonstrably within **Zone 2**, requiring:

- 1.5 Parking Spaces per Consulting Room for Medical/Health centres,
- 1 per 25m² GFA Retail Convenience,
- 1 per 35m² GFA Retail Comparison, and
- 1 per 40m² for a Gym.

With reference to the Development Schedule of Accommodation, this equates to the following:

- Allow Max 8 parking spaces for the Health centre element,
- 216 parking spaces for the 5,401m² GFA Anchor Convenience,
- 141 parking spaces for the 4,949m² Anchor Comparison,
- 39 parking spaces for the Comparison Retail Units of 1,364m² GFA, and
- 20 parking spaces for the Gym Unit of 790m² GFA.

- **The Above Gives a total MAXIMUM Car Parking provision of 416 No. Spaces**

There are a total of 391 Car Parking Spaces proposed on the site, which is consistent with the maximum parking requirements of the SDCC Development Plan 2022-2028.

In terms of **Objective 3**, we believe that the parking is consistent with the Objectives being less than the maximum allowable under the Development Plan.

In terms of **Objective 6**, we believe that the revised proposed layout is now consistent with the objective as it provides parking for disabled drivers, motorcycles and scooters.

In terms of **Objective 7**, in the case of Kilnamanagh Centre, realistically there is no real motivation to use the car park for other purposes other than for shopping at the centre. To our knowledge, there are no significant or notable attractions within the catchment of the Centre that would create a demand for long term car parking.

However, the Centre Management will continually monitor parking to ensure than long term parking does not occur, with ANPR Technology and surveillance deployed at other Dunnes Stores car parks to ensure that long term and inappropriate parking is controlled and prevented.

Item 6: Landscape Design Proposals

There are concerns with the lack of information submitted in relation to the landscape scheme for the proposed development. The applicant is requested to provide detailed landscape design for the proposed development. The applicant shall provide a fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section. The applicant shall provide the following additional information:

- i. The applicant shall submit a comprehensive Landscape Design Rationale, the objective of this report is to describe the proposed landscape and external works as part of this proposed housing development.
- ii. The applicant is requested to submit a fully detailed Planting Plan to accompany the landscape proposals for the entire development. The applicant should propose native species where possible to encourage biodiversity and support pollinators within the landscape.
- iii. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features and demonstrate how natural SUDS features can be incorporated into the design of the proposed Development
- iv. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site
- v. Submit green infrastructure proposals and a green infrastructure plan that will mitigate and compensate for the impact of the proposed development on this existing site and show connections to the wider GI Network. These proposals should include additional landscaping, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the local Bat population.

In relation to the items above the following is noted by CSR:

The original application submission included a Landscape Masterplan and Landscape and Maintenance Report for the proposed development which appears to have not been reviewed by SDCC as indicated by the council's planner's report.

Please see a copy of the Drawing No 22146-2-100 Rev B Landscape Masterplan and Landscape Design Report Rev A for further details on the proposed landscaping. The revised plan reflects the minor updates to the parking arrangements on the proposed site layout.

- i) A landscape design rationale is provided within the attached Landscape Design Report. It provides details of the landscape concept and masterplan, green infrastructure, soft and hard materials and an indicative landscape maintenance for the scheme.
- ii) Please see the attached Landscape Masterplan 22146-2-100 Rev B for details of the proposed planting types, species, sizes and density. It includes a range of native and non-native species which provide visual interest throughout the year and are supportive of both the All-Ireland Pollinator Plan and Dunnes Stores own pollinator plan to collectively help encourage biodiversity across the site and surroundings.
- iii) Please see the landscape master plan for details of the proposed planting along with the architect and engineer's layout for hard landscaping proposals. The proposed landscaping is largely limited to infill of the existing open space and

minor carpark islands and will not alter the site levels of these existing features and nor are there any changes to the existing boundary edges. Thus, it is felt the use of sections would be unnecessary to illustrative the limited landscape changes within the existing site. The large green roof which will help reduce overflow as part of SUDs measures is indicated on the plans.

iv) The proposed development will not significantly impact on the green infrastructure of the site or surrounding as stated, but rather greatly enhance the existing green infrastructure of the site and surrounding. This will be achieved by retention of most of the existing trees, wildflower meadow strips and grassland. Only 7no. trees and small portion of grassland will be removed to allow for improved access. This minor loss of vegetation cover is overcompensated by the additional of 43no. trees and 290m² of hedge along with new areas of shrubs and wildflower meadows planted up along the boundary edges and a large green roof upon on the building's proposed extension.

See the Landscape Design report for details of the site's Green Infrastructure and how it related to the surrounding GI.

v) As above, please see the Landscape Design Report and Landscape Masterplan for details of the existing and proposed Green Infrastructure and its connectivity between the site and surroundings. It is important to note that the proposed extension to the existing building will occur over the existing store's car park area and not impact upon greenspace. This new building's green roof along with the other proposed landscape measures will bring about a net gain to the site's existing Green Infrastructure rather than a loss.

Item 7: SUDS

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

- Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.
- A drawing to show how surface water shall be attenuated to greenfield run off rates.
- Submit a drawing to show what SuDS (Sustainable Drainage Systems) are proposed. Examples of SuDS include permeable paving, filter drains, bio-retention tree pits, swales or other such SuDS.
- SUDs Management - The applicant is requested to submit a comprehensive SUDS Management Plan to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan should also be included as a demonstration of how the system will function following implementation.

The applicant is referred to the recently published SDCC SuDS Design Guide for further information and guidance.

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

An extensive green roof system consisting of lightweight sedum/moss layers, capable of intercepting a minimum of 5mm of rainwater across its area has been specified on the proposed building extension. This will provide ecological, aesthetic and amenity benefits and will help retain rainfall at the source and reduce the volume of runoff and attenuate peak flows. The green roof will absorb the majority of rainfall received during ordinary rainfall events and will contribute to the attenuation of flows for larger events.

The runoff collected from the green roof will be directed to a below ground attenuation tank to the east of the extension which is designed to facilitate storage of runoff from storm events of up to and including 1:100 year events of critical duration. As outlined in the civil report lodged with the planning application for this development, the proposed building extension will be located on an area of the site which is currently used as carparking and is impermeable. Therefore, the proposed building will not increase the impermeable area on the site and in fact through use of SuDS measures including the green roof and attenuation system, the surface water management on the site will be improved as a result of the proposed works.

Other SuDS measures such as tree pits, filter drains and swales are not suitable for this site given its existing developed nature and lack of space. The drainage solution as mentioned herein will significantly improve the performance of the surface water drainage in the area of the site to be proposed to be developed as part of this application.

2: A drawing to show how surface water shall be attenuated to greenfield run off rates.

Refer to drawing 220063-ORS-ZZ-00-DR-C-400 which shows the green roof system, attenuation tank and the flow control device on plan.

3: Submit a drawing to show what SuDS (Sustainable Drainage Systems) are proposed. Examples of SuDS include permeable paving, filter drains, bio-retention tree pits, swales or other such SuDS.

Refer to drawing 220063-ORS-ZZ-00-DR-C-400. Also refer to drawing 220063-ORS-ZZ-XX-DR-C-402 which was lodged with the original planning application for details of the attenuation tank.

Refer to Architects drawing PL-012 for typical green roof build-up (a standard extensive sedum mat roof).

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

Refer to 220063-ORS-XX-XX-RP-C-13a-002 - SuDS Management and Maintenance Plan.

Item 8: Green Space Factor

A Green Space Factor (GSF) Worksheet should be submitted by the applicant for the proposed development detailing how they have achieved the appropriate the minimum Green Space Factor (GSF) scoring established by their land-use zoning. Minimum required score for a District Centre is 0.5. A worksheet can be obtained from the SDCC Public Realm Department.

Developers can improve their green factor score by retaining existing landscape features and incorporating new landscape features and GI interventions. Completed Green Space Factor (GSF) worksheets should be submitted to SDCC with the Green Infrastructure Plan and Landscape Plan for a proposed development.

The Green Space Factor Guidance notes states:

New residential and commercial development comprising 2 or more residential units and / or 1,000 sq.metres of commercial floor space are required to reach the minimum green factor score established by their land use zoning. New residential and commercial development comprising 2 or more residential units and / or 1,000 sq.metres of commercial floor space are required to reach the minimum green factor score established by their land use zoning. Minimum required scores for different land use zonings are included in Table 1 below.

The GSF for a District Centre is 0.5.

It is notable that the GSF applies to new development. Kilnamanagh Shopping Centre is not a new development, but a long established centre, of its time. So in this regard the GSF score cannot be reasonably applied in the manner set out in the Guidance. The GSF Guidance makes no reference to extensions or indeed how they should be assessed, which is an omission of note.

That being said the application is very well aware of the need to enhance the sustainability of their properties and as with their own self activated Pollinator plan already in place; exploration into PV, it is noted that the proposed development will improve the centres GSF score relative to the current GSF score. Indeed, as the CSR Landplan, Design Report (attached to this response) the centres GSF score would see a manifold increase.

In accordance with the Guidance note (penultimate paragraph the GI measures set out in the GSF score as included in the CSR Landscape Design Report is "...dictated by site specific context".

CSR Landplan notes as follows:

A green space factor (GSF) scoring has been calculated for both the existing shopping centre and the proposed development over the same site area, to directly compare how the proposed landscaping and Green Infrastructure affects the existing site's scoring. The tables can be found within the accompanying Landscape Design Report.

It was found that the existing site has a **GSF scoring of 0.06** and the proposed development's **GSF scoring of 0.12**. Although both fall short of the 0.5 required for District Centre. This is due to the calculation accounting for a substantial portion

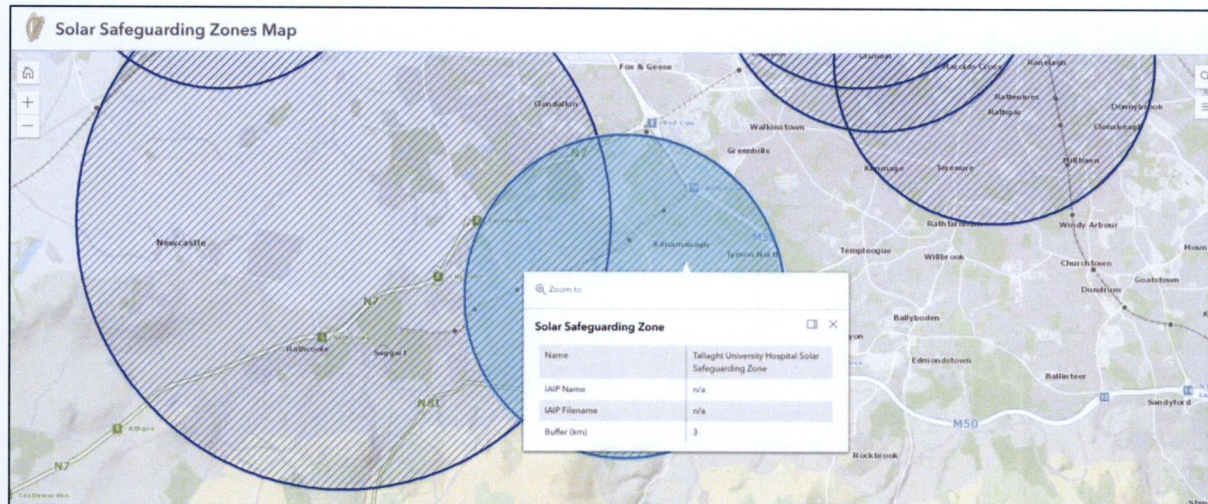
of the overall site area containing the existing building and carpark. The centre's structure currently covers approximately 40% of the site and the carpark surface, 50% of the site. The new extension will be located over an area of carpark, altering these percentages slightly with a reduced carpark cover of approximately 5% to 45% and extending the built cover to approximately 40% of the overall site area.

The proposed GSF is **2 times greater** than that of the existing site due to the proposed landscape enhancements around the existing site and maximising the extension's roof cover for SUDs and biodiversity benefits.

Item 9: Energy

The County Development Plan encourages the use of renewable energy at employment sites and the use of solar panels. The applicant is invited to consider the possibility of ‘greening’ the development by installing solar panels on the roof of the shopping centre, by way of additional information.

PDA plan PL 109 includes a roof plan showing the potential location for PV solar panels. This does not form part of this application as the feasibility of same is being reviewed by the Structural Engineer. The initial feedback is that this location should be structurally suitable.



Source: MyPlan.ie

The site also falls inside the recently published "Tallaght University Hospital Solar Safeguarding Zone: which will require further assessment to determine an suitable approach. An application for same can be made in due course if required.

Item 10: Signage

The following revision should be incorporated into the proposed scheme of signage;

- I. The applicant is requested to provide a revised scheme of signage that incorporates a reduction in the lettering height so as to be more in keeping with the scale of the existing signage.
- II. The proposed totem signage

(Item i) Elevation Signage: In relation to the Development Guidance on signage we note the following (Section 12.5.7):

“Signage relates to all signs erected on the exterior of buildings, within windows, as stand-alone structures or attached to public utilities. Signage has the potential to give rise to visual clutter and to alter the character of an area and as such will be carefully assessed. Development proposals that include signage should take account of the following:

In general, signs on a building should only advertise goods or services that are associated with the premises and no more than two advertising signs should be erected on any elevation; The application complies.

Signs should generally be limited to the ground floor of a building unless located directly over the entrance to a major commercial or retail building; There is a potential contradiction in this point with point 1 given that there can be two signs per elevation.

Signs should be simple in design and integrate with the architectural language of the building and not obscure any architectural features. Signs should be proportionate to the scale of the building to which they are attached and sensitive to the surrounding environment; In relation to items 3 and 4 PDA notes as follows:

It is noted in the RFI that the signage on the building should be reduced. The proposed signage is in keeping with current Dunnes Stores signage throughout the country and we would contend that the current signage is to be replaced to be more in keeping with the new proposed signage. The building is set back from the roadside by 30m and therefore familiar retailer signage is important to enhance the proposed new look of the Centre in the round. The proposed signage is internally illuminated and back lit and does not provide a source of overspill light to the general area. They are located on large flat panel to avoid any cross over of building features and enhance the appearance of these Elevations.

As per Table 3.19 of the Development Plan (reproduced below) backlit signage is generally permitted. The limitation of scale in 3.19 is not practical in this case. 400mm is the maximum scale applied in the Conservation Areas in Dublin City centre, to individual shopfront fascia boards. That scale is entirely inappropriate on a building of the scale in this case.

Signs attached to Protected Structures and in Architectural Conservation Areas should be in keeping with the character of the building and adhere to best practice

conservation principles (see Section 12.3.8 Architectural Conservation Areas); not applicable.

Any sign or associated structure should not create an obstruction to pedestrian or cyclist movement or create a traffic hazard; There is no indication from the Planning Authority that the proposed signage would create a traffic hazard.

Careful consideration should be given to the materials used in the construction of a sign and the methods used to light it". Please refer to the PDA Design Statement.

The proposed signage is not garish but uses an understated palette with carefully considered lighting. The proposed signage as with the totems are representative of a fresh start and a revitalisation of a dated centre. Signage is a critical component in retail and the project Architect has explained in detail the rationale behind its scale, palette and positioning. The Planning Authority's own signage guidance is just that, guidance so it allows scope for considering the overall merit of any signage proposal, relative to the property on which it is located. To that end, we consider the signage as proposed (including the Totems) is reasonable.

(Item ii) TOTEM Signs: In relation to the second item. This is incomplete but a review of the Council Planner's Report notes that the Totems should be removed. We would argue that that is unreasonable for the following reasons:

1. Advertising and Advertising Structures are permitted in principle in the District Centre Zoning. Therefore, the starting position of any assessment is positive.
2. Totem signs are a critical way finding tool, common in all centres with multiple occupancy as they provide easily accessible information for customers as to the make up the operators within the building. They are an essential component of a District Centre, especially as the uses are expanding as part of this application. In addition, the totems are located at the enhanced pedestrian entrance and the improved vehicle entrance helping, drivers, walkers and cyclist navigate.
3. As per Table 3.19 of the Development Plan (reproduced below) Freestanding signs can be considered in Shopping Centres and should be a maximum of 7.0metres. The proposed totems are a mere 4 metres in height.

Table 3.19: Type of Signs	Restrictions On Use	Design Criteria
Backlit Signs	Generally appropriate.	Lettering should be no more than 400mm in height.
Bus Shelters	Generally appropriate	The primary purpose of illumination should be to light the shelter.
Digital Signs	Generally not appropriate with the exception of those that accord with the Council's signage strategy. May be considered in town centres and / or large retail precincts and at other suitable locations throughout the County. Not permitted on major roads	Should make a positive contribution to the public domain, omit no sound, have a minimum dwell period of 30 seconds (with a crossfade), not result in obtrusive light that will create unacceptable glare (adjusting to environmental conditions), have limited hours of operation (especially at night), not

	unless signage relates to the signage strategy or traffic management and safety.	contain dynamic content (that is, video) and not constitute a traffic hazard.	
Fascias and Box Signs	Generally appropriate.	Should not be internally illuminated. Lettering should be no more than 400mm in height.	
Public Information Panels	Generally appropriate.	Should not obstruct footpath / cycle paths. Advertising permitted on public information panels will be restricted and should constitute not more than 50% of the total area.	
Wall Panel / Poster Board Advertisements	Generally appropriate.	Should not exceed 30% of the surface of the wall or screening on which it is mounted.	
Window signs	Generally appropriate.	Must not occupy more than 25% of window space.	

Free Standing Advertisement Displays	Generally not appropriate. May be considered at the entrances to shopping centres / major commercial premises and service stations	A maximum of 7m in height. Freestanding signs on petrol station forecourts should not extend above the height of the canopy.
Projecting Signs	Generally not appropriate.	Must be positioned no lower than 2.4m above pavement level (but not on upper floors). Maximum of one per unit. Should not be internally illuminated.
Neon Signs	Generally not appropriate.	Should not be displayed in village centres.
Signs above Parapet	Not permitted.	
Prismatic / Moving Vane Signs	Not permitted.	
Structures on Public Footpaths and Public Area	Not permitted.	
Sundry Advertising Devices	Not permitted.	Includes pavement signs or sandwich boards, spotlights, flags, bunting, banners, neon moving message signs, fly posting and barrage / balloons.

The Council has granted permission for many totem signs within its jurisdiction, to competing retailers. Some examples are set out below:

Lidl, Belgard Road



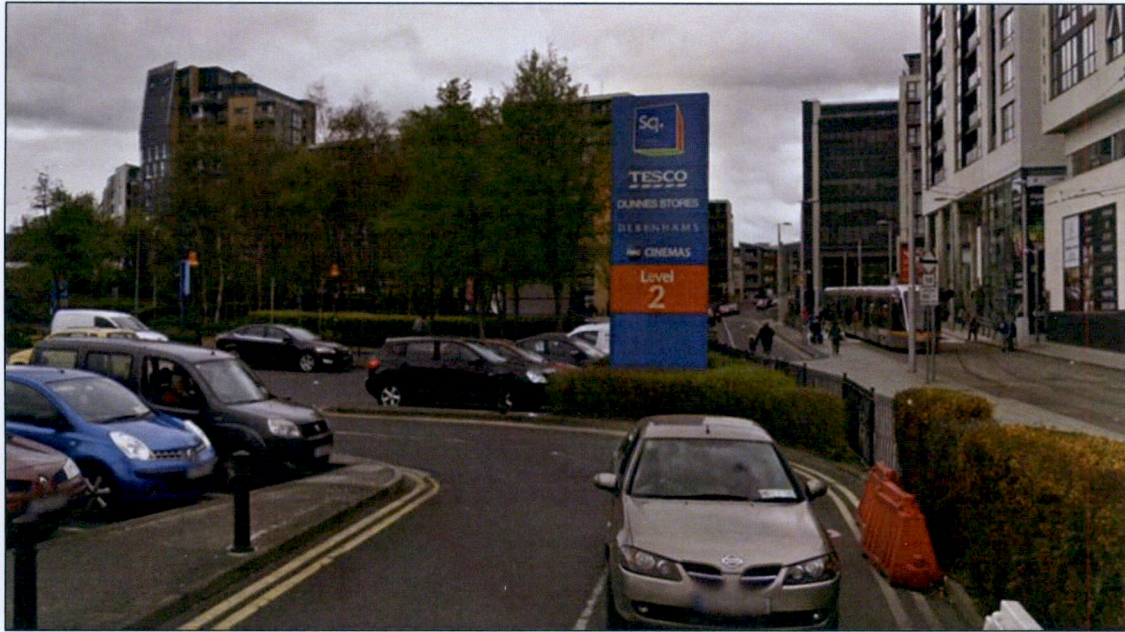
Lidl, Main Rd, Dublin



SuperValu, Heatherview Rd, Dublin



The Square Shopping Centre, Tallaght



Taking on board the above facts we consider there is a presumption in favour of the totem sign, noting that the Centre presently does not have this infrastructure in place; advertising structures and advertising are permitted in principle; are good for wayfinding; and the proposed totems comply with the maximum height guidance (we have crossed out those items which are not relevant to this application).