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# PLANNING REPORT

**RESPONSE TO REQUEST FOR FURTHER INFORMATION**

**RESIDENTIAL DEVELOPMENT**

**REG. REF. SD22A/0035**

**Lands within St Marys Priory, Old Greenhills Road, Tallaght, Dublin  
24. REG. REF. SD22A/0035**

South Dublin County Council

NOVEMBER 2022

SUBMITTED ON BEHALF OF:  
St. Marys Medical (Tallaght) Ltd.

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## 1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have prepared this response, on behalf of our clients St. Marys Medical (Tallaght) Ltd., to the Council's request for Further Information under Reg. Ref. SD22A/0035 for a development Lands within St Marys Priory, Old Greenhills Road, Tallaght, Dublin. The application seeks permission for the following proposal, the description being as per the statutory notices:

*'(a) Construction of a 4 storey nursing home building consisting of: (i) 106 bedrooms (with ensuite); (ii) associated residents welfare facilities; (iii) administration areas and staff facilities; (iv) multi-function space and pharmacy proposed at ground level; (b) construction of 60 one bed independent living units in 3 blocks as follows: (1) Block A, a 4 storey building comprising 11 one-bed units; (2) Block B, a part 4/part 5 storey building comprising 35 one-bed units; and (3) Block C, a 5 storey building comprising 14 one-bed unit. Each unit will be provided with a private open space in the form of a balcony terrace (6sq.m.) (c) The development will include communal open space and landscaping (including new tree planting and tree retention), 30 car park spaces (including 3 limited mobility parking spaces; 3 EV parking and 1 car sharing spaces); and 52 bicycle parking spaces (d) The development will be served by a new pedestrian and vehicular access from Old Greenhills Road through existing boundary wall. Material from the removed wall will be repurposed within the landscape areas; and (e) The development includes landscaping, boundary treatments (including wells and railings to southern and western boundaries), and ESB Substation SuDs drainage, road infrastructure and all ancillary site works necessary to facilitate the development.'*

The request for Further Information from South Dublin County Council was dated 6<sup>th</sup> April 2022. The appropriate period was subject to a 3 month extension request by the Applicant and subsequently granted by the Planning Authority, extending the response period to 1<sup>st</sup> January 2023. Therefore, this response is submitted within the timeframe pursuant to Article 33(3) of the Planning and Development Regulations 2001 (as amended).

This report has been prepared in conjunction with the specialist technical and professional advice of JNP Architects; CS Engineers; and Brian Keeley Bat Surveys.

This report sets out the applicant's response in full to the request for further information having regard to the requirements of the recently adopted South Dublin County Council Development Plan 2022-2028. The new development plan has replaced the 2016-2022 plan which the proposal was initially assessed against. It is contended that the proposal continues to be in accordance with the development plan. It is submitted that the proposed development accords with the proper planning and sustainable development of the area and that permission should be **granted** accordingly.

## 2.0 Request for Further Information

This section of this response sets out the applicant's response in full to the request for additional information and refers to drawings and particulars from various bodies included with this report.

### Item No. 1

*'The applicant is requested to address the issues raised by the Planning Authority in relation to Conservation and to show in their overall response how these issues have been addressed.'*

- (1) Concerns remain in that the character of the Protected Structures will be significantly affected by the proposed Nursing Home and Independent Living Accommodation blocks as the new build will completely dominate this part of the site due to its proposed, height, scale and mass which will be visible within The Priory Demesne and along Old Greenhills Road. The consequences of the proposed development may result in a diminished quality of character, which fails to address and adhere to existing policies for development within the curtilage of a Protected Structure or New development within or in close proximity to an ACA in line with SDCC County Development Plan (2016-2022) and the Tallaght Local Area Plan 2020.*

- (2) *It is considered that the proposed design with the use of contemporary materials and building elements found within the existing building stocks tries to address the issue of a contemporary design within a historic site. However, given that the issue of building height, mass and dense form of the proposed blocks, the overall impact cannot be negated by the design elements and finishes alone. It is considered that the proposed development fails to be sensitive within its proposed location and does not reflect the most suitable layout or design for the intended use. A lower scale development providing different levels and design styles would allow for a high quality unique development within the curtilage of a Protected Structure, historical setting and within such close proximity to a village centre.*
- (3) *It is felt that given the location of the site adjoining the Priory Complex and in such proximity to the village centre any new development at this location should provide an identifiable contemporary addition, adding the architectural interest to the adjoining Priory and Tallaght Village. It should be noted that Block A, Block B and Block C are the same overall design, which does not allow for variation and unique building types that can add to the character and identity of the site.*
- (4) *It is considered that the proposed blocks are dense and require redesign to allow a more subtle and mixed architectural type to reflect a more village/community feel development. There is reference to a "Village Hub" with regard to the location and connection of the associated facilities with the Nursing Home and Independent Living for Older People, however this is not reflected in the overall design of the proposed development. The proposed use on the site is ideal in terms of its location to Tallaght Village and other facilities but the design and layout of the proposed Nursing Home and in particular, the Independent Living Accommodation needs to be more cognisance of the proposed type of development in providing a development that is more suited to this use.*
- (5) *It is proposed to insert a new entrance within the existing original boundary wall of the Priory. It should be noted that in order to provide a new entrance and justify the removal of an original boundary feature a scheme that addressed the concerns and allows for a development which is sensitive to the site context and one that delivers a suitable type at this location is required. Currently this is not the case and therefore a compromise between allowing a section of the original boundary wall to be removed to facilitate the proposed development cannot be considered based on the current scheme. Allowing a new entrance at this location will only be considered when a proposed development is deemed to make a contribution to Tallaght Village and the adjoining Protected Structure site in providing for a visually attractive and smaller scale scheme and sustainable development.*

### **Applicant's Response**

In response to the above, we would ask the Planning Authority to have due regard to the enclosed drawing pack as prepared by JNP Architects, attached in Appendix A. The Design Team has undergone extensive redesign following feedback received from the Planning Authority. The Applicant has now removed the previously proposed Block B, a part 4/part 5 storey building comprising 35 one-bed units whilst also reducing the remaining blocks to two-storey or single storey. The nursing home design has not been altered. The revised design has allowed for an improved open space strategy whilst also ensuring the integrity and character of the Priory is retained. The landscaping strategy allows for a public walkway though the entirety of the site and may be conceived as an extension of the priory building itself. The key views are retained which results in the Priory serving as a landmark within the site.

The redesign is considered to be much more sensitive to the Priory while also adding visual interest to the area. The units are contemporary in style but do not detract from the protected structure on the adjoining lands.



Figure 1.0 CGI of proposed development from the main entrance.

It is contended that the revised scheme has been informed by South Dublin County Council's feedback and is a high quality scheme well suited for the location.

## **Item No. 2**

*'Taken in isolation, the proposed intensity of development might be considered to be appropriate if the site was located along secondary frontage within the existing street network or a proposed new urban district (as with for instance, Cookstown). The proposed scheme is however located off the existing street network and on lands previously part of a local institution and within the curtilage of a protected structure and being a major site in the context of the village centre and ACA. As signalled in previous decisions and pre-planning guidance, the proposed plot ratio is excessive and taken in combination with the height, the overall intensity of development would contradict the following objectives of the Local Area Plan: - Section 3.4 specification in relation to Building Height reads 'To respond to local context, particularly the Architectural Conservation Area.' - VL6: Protect and enhance setting of protected structures and - VL6: (Protect and enhance...) qualities of the ACA. - VL8: Protect the character and integrity of the Priory, including its parkland setting, and - VL8: Provide for greater public access and usage. - VL10: Provide for some residential or mixed-use development on lands to the east of the Priory, subject to the above key objectives. The proposed Old Greenhills Road access and permanent division of the Priory Grounds is considered to seriously detract from the character of the Priory and has only been considered by South Dublin County Council in the context of providing a social and community benefit at the site; however, policy which seeks to protect the setting of the protected structure, the ACA and the village centre, and the parkland setting of the grounds, and to promote public access to and use of these grounds, has not been set aside and remains a determining factor in any development of the site. A lower impact scheme would dissipate the proposed development among smaller blocks, arranged around the proposed facilities to give what the ACO describes as a 'village hub' character to the scheme. The buildings are still considered to be bulky and monolithic, and laid out in such a fashion that detracts from the parkland setting of the site. The proposal detracts from the character of the site, surrounding area and ACA. The applicant has shown a willingness to amend the design since the most recent refusal. The applicant is requested therefore to provide revised plans, following consultation with the Planning Authority and the SDCC Architectural Conservation Officer if necessary, by way of additional information.'*

## **Applicant's Response**

In response to the above, we would ask the Planning Authority to have due regard to the enclosed drawing pack as prepared by JNP Architects, attached in Appendix A. The Applicant and Design Team engaged in communication with the Planning Authority and Conservation Department in order to

redesign a more appropriate scheme. The scheme is now considered to be of much lower impact scheme. At the centre of the development is the nursing home which is a key community use, and includes a pharmacy for residents both within the scheme and within the wider area. The site is served by a high quality landscaping scheme which will be accessible to the residents, visitors, and members of the wider public. The buildings have been redesigned and reduced in bulk, massing and height and are now laid out a fashion that integrates into the parkland setting of the site. The proposal protects and may be considered to improve the character of the site, surrounding area and ACA.



Figure 2.0 Revised site plan showing a much reduced layout with a large quantum of open space.

**Item No. 3**

*'The applicant is requested to provide an outline SuDs Strategy, which should match the Landscape Plan and Engineering drawings submitted (and revised as may be). Additional natural SuDs features shall be incorporated into the proposed drainage system for the development such as blue roofs, rain gardens, detention basins, filter drains, rills, swales, rainwater features etc. The strategy should include an outline layout and calculations to show that greenfield run-off rates from the site outside of major weather events are to be maintained without the need for underground water storage. The applicant is advised to consult the SDCC Sustainable Drainage Design & Evaluation Guide 2022.'*

**Applicant's Response**

Please refer to the drawing pack prepared by CS Engineers, in Appendix B, that includes an outline SuDS Strategy in order to fulfil this item of the request. CS Consulting has prepared a SUDS Design Statement (D092-CSC-ZZ-XX-RP-C-0005) which outlines the revised SuDS strategy which ties in with the objectives described in the SDCC Sustainable Drainage Design & Evaluation. This document provides further information about the proposed management train maximising the benefits of the SUDS philosophy. This document also contains additional information regarding the rationale followed in the

calculation of the greenfield runoff rates, the long-term storage and a summary of the results of the hydraulic simulation. Refer to CS drawings D092-CSC-XX-DR-C-0003, -005, -0014, -0017 & -0018 for further details. The accompanying landscaping pack has been prepared by Doyle O'Troithigh and is contained at Appendix C.

#### **Item No. 4**

*'(a) The applicant has submitted limited surface water drainage plans for the proposed development. The applicant is requested to submit a detailed drawing showing existing and proposed surface water drainage layouts up to and including the point of connection to the public surface water sewer from proposed developments. The drawing shall include the location of all AJs, manholes, pipe size, material type and direction of flow. Maps of surface water drainage networks may be obtained, if available, for required locations in South Dublin County Council by emailing [servicemaps@sdublincoco.ie](mailto:servicemaps@sdublincoco.ie).*

*(b)*

*(i) The applicant is requested to submit a drawing and report to show how much surface water attenuation is provided in m3. The proposed attenuation calculation of 348m3 required is 30% undersized for a 1 in 30 year storm event and undersized by 42% for a 1 in 100 year storm event. Show how SAAR (Standard Annual Average Rainfall) was calculated.*

*(ii) Submit a revised report and drawing showing increased surface water attenuation provided. Attenuation shall be provided by SuDS (Sustainable Drainage System) as a first option and only where SuDS cannot provide enough attenuation should an arched type attenuation be considered.*

*(iii) The applicant should contact Water Services Department of South Dublin County Council prior to submission of revised report and drawing/s.*

*(c) The applicant is requested to submit a report and drawing to show the location of proposed development superimposed on a CFRAM OPW flood map. This is required to show what if any flood risk there is as a result of proposed development.'*

#### **Applicant's Response**

In response to Items A, B and C above, please refer to the documentation prepared by CS Consulting.

#### **Item No. 5**

*'(a) The applicant is requested to:*

*(i) Submit a pre connection enquiry with Irish Water for proposed development.*

*(ii) Obtain a letter of confirmation of feasibility of proposed development and submit same to WaterServices South Dublin County Council Planning Authority.*

*(iii) Submit a drawing showing the watermain layout of proposed development. Maps of the public watermain networks may be obtained, if available, for required locations in by emailing: [datarequests@water.ie](mailto:datarequests@water.ie).*

*(b) The applicant is requested to:*

*(i) Submit a pre connection enquiry with Irish Water for proposed development.*

*(ii) Obtain a letter of confirmation of feasibility of proposed development and submit same to Water Services South Dublin County Council Planning Authority.*

(iii) Submit a drawing showing the waste water layout of proposed development. Maps of the public wastewater networks may be obtained, if available, for required locations in by emailing: [datarequests@water.ie](mailto:datarequests@water.ie).

### **Applicant's Response**

Please refer to the drawing pack prepared by CS Engineers contained within Appendix B which fulfils this item of the request.

#### **Item No. 6**

*'The applicant is requested to confirm the no. of staff likely to be employed in the nursing home and to factor this into their assessment and design of car parking in the scheme. The number used for staff should reflect the maximum number of staff that will be present at the same time, including at times of shift changeovers.'*

### **Applicant's Response**

The nursing home will be anticipated to employ approximately 30 no. people. The car parking provision is considered to be an appropriate level to facilitate car parking for staff and visitors at peak times, including at shift changeovers. It is of note that a large proportion of the workforce will be residing locally and, thus, will be expected to utilise more sustainable modes of transport including by bus, bike or by foot. There are sufficient cycle parking spaces to facilitate parking requirements, in tandem with the quantum of car parking. The application site is located within Zone 2 which affords opportunities for reduced levels of car parking in comparison to Zone 1. The rate for the nursing home is 1 space per 8 no. residents. Thus, a total of 13 spaces are required to serve the nursing home and 10 no. to serve the independent living units. 24 no. spaces are provided which exceeds this level. Car ownership of occupants of the nursing home will be zero whilst ownership of the independent living units will be low. It is contended that there is an abundance of car parking spaces to serve what is considered to be a low car parking generating land use.

#### **Item No. 7**

*'The applicant is requested to provide a Sunlight and Daylight Analysis showing assessment of the proposed units and open spaces and show assessment of sunlight hours, average daylight factor.'*

### **Applicant's Response**

The Applicant has amended the design of the scheme since lodgement, including the omission of Block B (a part 4/part 5 storey building comprising 35 one-bed units) entirely and increasing the quantum of public open space. Additionally, the remaining blocks comprise either single-storey or two-storey buildings. Due to the revised design of the scheme in addition to the separation distances between open spaces and units, that there is no requirement for a Sunlight and Daylight Analysis as the reduction in heights and unit numbers would ensure that no undue overshadowing occurs and that each open space and residential unit will achieve appropriate lighting.

#### **Item No. 8**

*'The Ecological Assessment states that no bat survey has been conducted although mitigation measures are proposed. It is considered appropriate that the scheme is designed so as to minimise impact on bat activity and habitats (especially habitats).'*

*(a) A bat survey should be undertaken to establish the presence of bats, the areas of the site used by bats and for what activities or roosting.*

*(b) Mitigation measures should be reflected in the scheme plans and if necessary details should be provided to show that the scheme can be safely lit.'*

### **Applicant's Response**

In response to the above request, please refer to the Bat Survey by Brian Keeley, attached in Appendix D of this report. The Bat Survey proposes several mitigation measures during construction and operation stages. These measures will be adhered to in full.

#### **Item No. 9**

*'Section 7.0 Climate Change: Mitigation of the LAP identifies the role of Tallaght in contributing to the response to climate change while integrating and implementing the SDCC Climate Change Action Plan (2019). Section 7.4.4 and 7.4.5 outline the requirements for new developments to have regard to the incorporation of space for future pipework/pipe run, energy centres or other infrastructure and future proofing to enable connection to a decentralised energy network. The Tallaght District Heating Scheme is under construction and will serve the local area with cheaper heat using waste heat from nearby data centres. The applicant should consider how the design of this scheme can integrate with and use the district heating scheme.'*

### **Applicant's Response**

The design team have had cognisance of the Tallaght District Heating Scheme and the proposed development can be integrated with the district heating scheme, if permitted. Further details can be submitted post planning for agreement

### **3.0 Conclusion**

It is submitted that the various items raised in South Dublin County Council's request for further information have been comprehensively addressed in this submission. We consider that the proposed development is compliant with the policies and objectives as set out in the South Dublin County Council Development Plan 2022-2028.

We are of the opinion that the Further Information response is not considered to be significant and revised public notices are not considered to be required.

The proposal is in accordance with the proper planning and sustainable development of the area and as such we request that planning permission be granted in this instance.

Yours sincerely,



Kevin Hughes MIPI MRTPI  
Director  
for HPDC Ltd



**Appendix A**

Architectural drawings prepared by JNP Architects.

**Appendix B**

Engineering drawings and Report prepared by Cronin Sutton Engineers.

## **Appendix C**

Landscape pack Survey prepared by Doyle O'Troithigh.

**Appendix D**

Bat Survey prepared by Brian Keeley.