



THORNTON O'CONNOR
TOWN PLANNING

Planning Report

PLANNING REPORT

In respect of a proposed National Ambulance
Base at

Glen Abbey
Belgard Road
Dublin 24

Prepared on Behalf of HSE

November 2022

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THORNTON O'CONNOR
TOWN PLANNING

Planning Department
South Dublin County Council
County Hall
Tallaght
Dublin 24

9th November 2022

Dear Sir/Madam

RE: PROPOSED CHANGE OF USE AND EXTENSION OF A FORMER ADDICTION SERVICES FACILITY TO A NATIONAL AMBULANCE BASE STATION AT A SITE KNOWN AS THE GLEN ABBEY COMPLEX, BELGARD ROAD, TALLAGHT, DUBLIN 24, D24TD73 AND D24H267.

1.0 INTRODUCTION

1.1 Application for Development

Thornton O'Connor Town Planning¹ have been retained by the Health Service Executive (HSE)² in association with AXO Architects³, CHH Consulting Engineers⁴, RSK Group Ltd⁵, NRB Consulting Engineers⁶, Modelworks⁷ and Enviroguide Environmental Consulting⁸ to apply to South Dublin County Council for permission for the development works at a site known as the Glen Abbey Complex, Belgard Road, Tallaght, Dublin 24, D24TD73 and D24H267.

The subject site which has an area of 0.33 Ha is bound by a gym/warehouse facility to the north, 2 No. industrial blocks and 2 No. retail and restaurant units to the south at Colbert's Fort, Belgard Road to the east and currently vacant Glen Abbey Industrial Estate to the west, where permission has been secured for a residential development as will be detailed further in this Report.

This proposal is a model development for the HSE and will provide an example of sustainable development in the country and it will serve as an example to upgrade the existing stock of HSE buildings in the country. The intention of the development is to retain the 3 No. storey building and the vertical and horizontal expressions of the plate and retrofit and expand the building to a modern standard to be one of Ireland's first Carbon Neutral HSE buildings and a new National Ambulance Base. This development will measure the performance of the sustainable retrofitting of the building and lead the HSE's effort in reducing carbon emissions nationwide.

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² HSE Capital & Estates Office, Bridge House, Cherry Orchard Hospital, Ballyfermot, Dublin 10, D10 K033

³ Ellison St, Gorteendrunagh, Castlebar, Co. Mayo, F23 TH73

⁴ House 44, Innisfree, 45 High St, Sligo

⁵ Bluebell Business Centre, Old Naas Road, Bluebell, Dublin 12, Ireland

⁶ 1st Floor, Apollo Building, Dundrum Rd, Dundrum, Dublin 14

⁷ The Old Courtyard, Newtownpark Ave, Blackrock, Co. Dublin, A94 YD61

⁸ 3D Core C, Block 71, The Plaza Park West, Dublin, D12 F9TN

The Design Team consider that there is significant scope at the subject lands to provide a high-quality National Ambulance Base, which will play a key role in the emergency services and health services at the nearby Tallaght University Hospital and nationally.

1.2 Summary of Proposal

The proposed development is described in the statutory notices as follows:

'The proposed development principally comprises an extension to the existing building and a change of use of the existing building and site from a vacant mental health service facility to a National Ambulance Base facility.'

The proposed works principally include: the demolition of 40 sq m floor area; the removal of a stair-core, entrance ramp and steps to the north of the building, a staircore to the south of the building, a boiler house to the east of the building, and the boundary fence; provision of a new stairs and entrance ramp to the north of the building; the provision of lateral and vertical extensions at ground, first and second floor levels, increasing the gross floor area of the building from 943 sqm to 1,420 sq m; the rationalisation of existing floor space; the provision of an external canopy to shelter 14 No. emergency vehicles; the provision of a power washing station towards the south-western corner of the site; ancillary staff car-parking; cycle parking; revised elevational treatments; boundary treatments; hard and soft landscaping; and all associated works.'

1.3 Purpose of this Planning Report

The purpose of this Planning Report is to provide an overview of the following:

Introduction	Section 1
Site Location, Context and Description	Section 2
Development Rationale	Section 3
Planning History	Section 4
Proposed Development in Detail	Section 5
Planning Policy Context	Section 6
Planning Application Administration	Section 7
Conclusion	Section 8

1.4 Zoning of Subject Site

The subject site at Belgard Road, Tallaght is zoned by South Dublin County Council (SDCC) as 'REGEN' in the *South Dublin County Council Development Plan 2022-2028*. The main objective of lands zoned 'REGEN' 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 subject application proposes the sustainable reuse and extension of an existing healthcare facility, to provide a new National Ambulance Base in proximity to a range of hospitals including Tallaght Hospital.

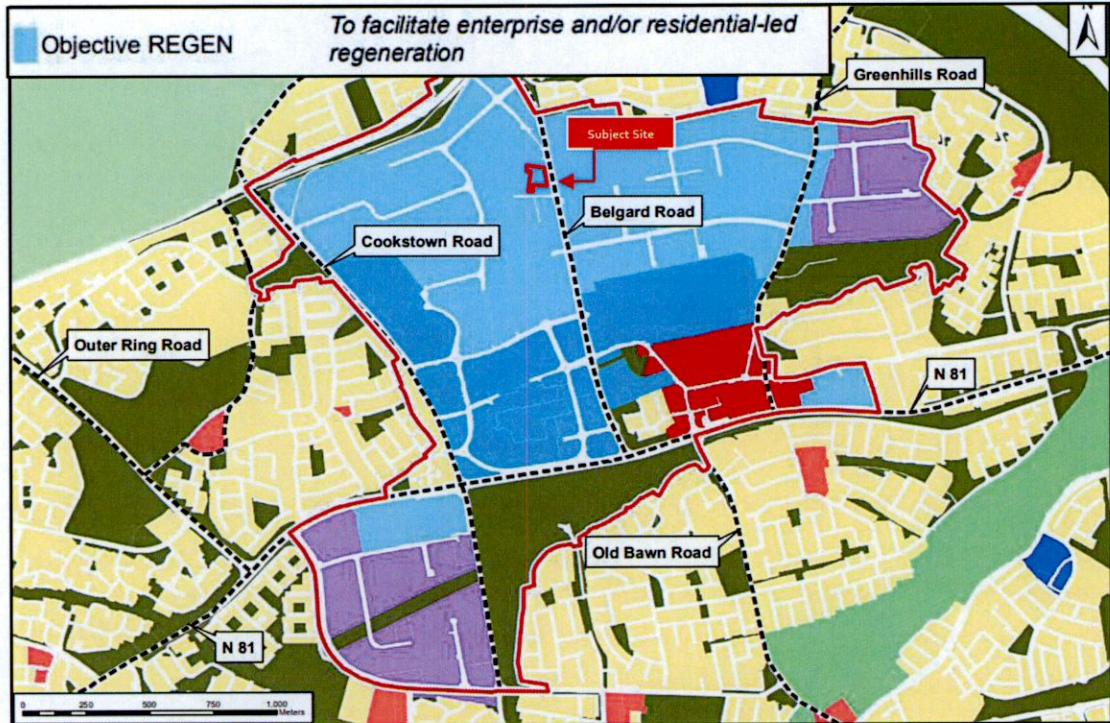


Figure 1.1: Tallaght LAP Zoning, Subject Site Outlined in Red

(Source: Tallaght LAP Land-Use Zoning Map 2020-2026, Zoning Map, annotated by Thornton O'Connor Town Planning, 2022)

2.0 SITE LOCATION, CONTEXT AND DESCRIPTION

2.1 Site Location

The subject site is located at a site known as Glen Abbey Complex at Belgard Road, Tallaght, Dublin 24 and measures 0.33 Ha. The subject site is bound by a gym/warehouse facility to the north, 2 No. industrial blocks and 2 No. retail and restaurant units to the south at Colbert's Fort, Belgard Road to the east at and currently vacant Glen Abbey Industrial Estate to the west.

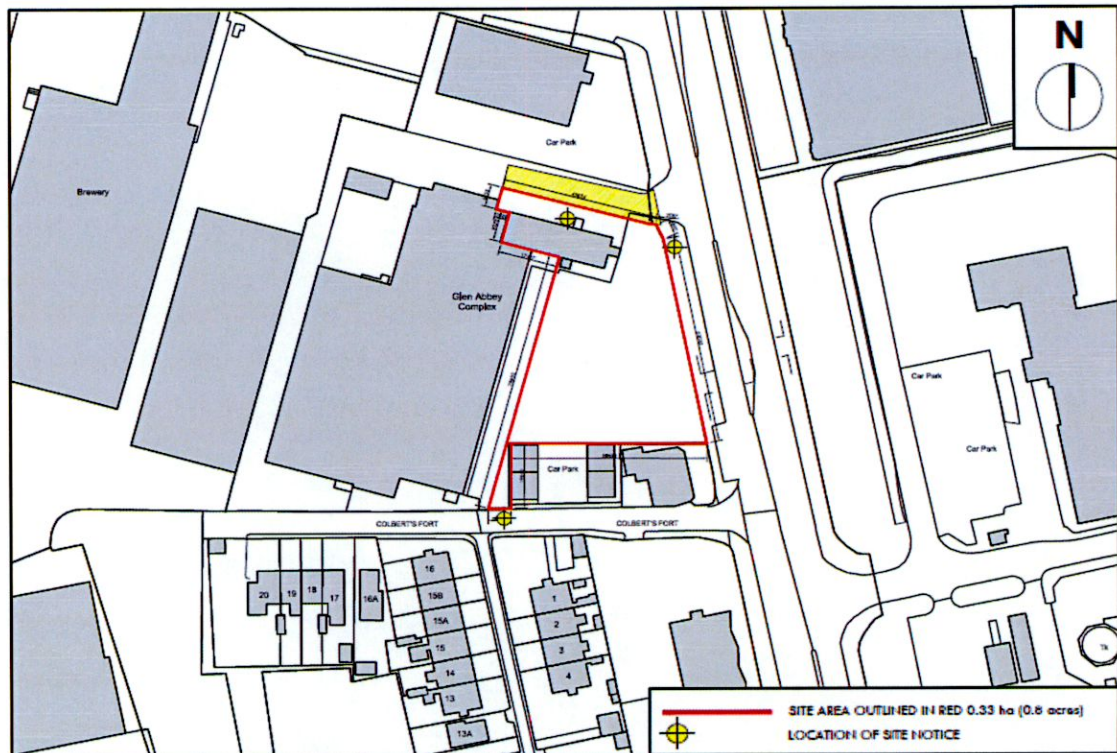


Figure 2.1: OSI Map of Subject Site Location

(Source: OSI, annotated by Thornton O'Connor Town Planning, 2022)

2.2 Site Context

The building is situated c. 1.4 km (a 15 No. minute walk and 3 No. minute drive) north east of Tallaght University Hospital; c. 1 km (c. 3 No. minute drive and 12 No. minute walk) north west of Tallaght IT and TU Tallaght, c. 1.6 km (c. 4 No. minute drive, 20 No. minute walk) to Tallaght Athletics Club and c. 1 km (c. 2 No. minute drive and 15 No. minute walk) north east of The Square in Tallaght. These places are active and vibrant community hubs in the South Dublin district, in which the ambulance service is less than 5 No. minutes-drive away.

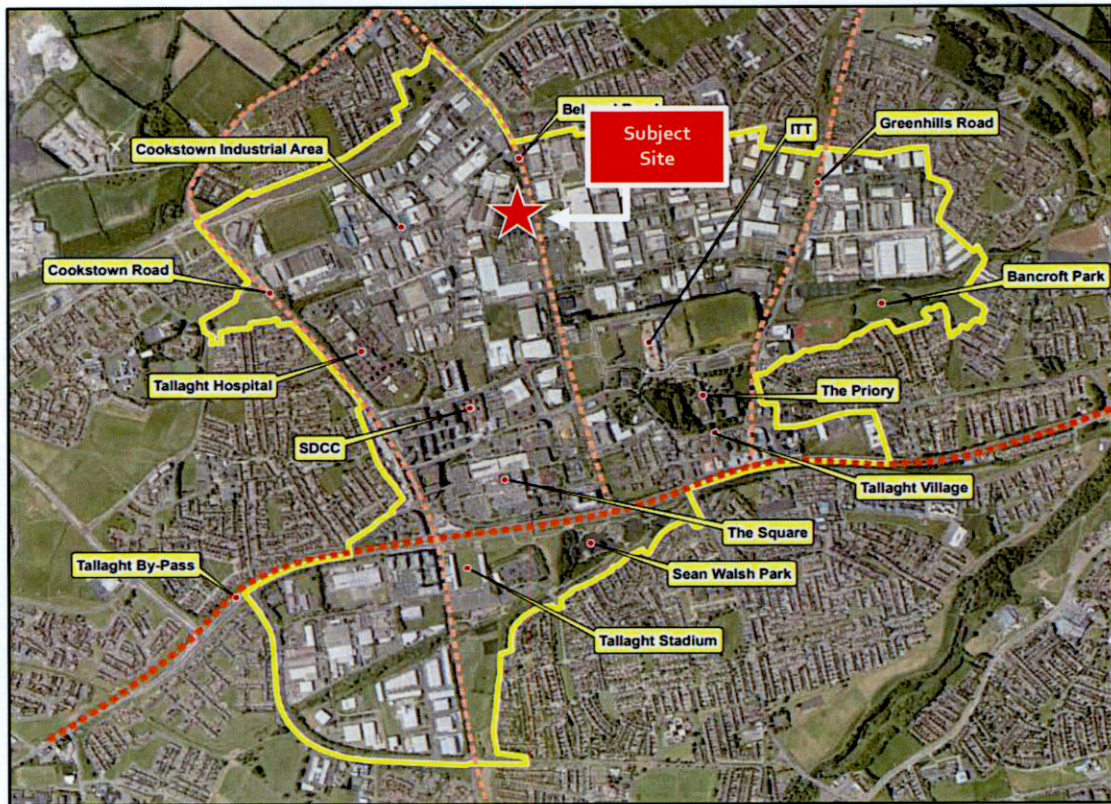


Figure 2.2: Tallaght LAP Boundary with Subject Site Indicated by Red Star

(Source: Tallaght Town Centre LAP 2020-2026, annotated by Thornton O'Connor Town Planning, 2022)

2.3 Site Description

The subject site is triangular in shape, with a small irregularly shaped site boundary extension at the south-west of the site which encompasses a hedgerow. The site boundary runs adjacent to the busy Belgard Road and pedestrian crossing. The existing HSE building is a vacant addiction services facility and measures 943 sq m in gross floor area.

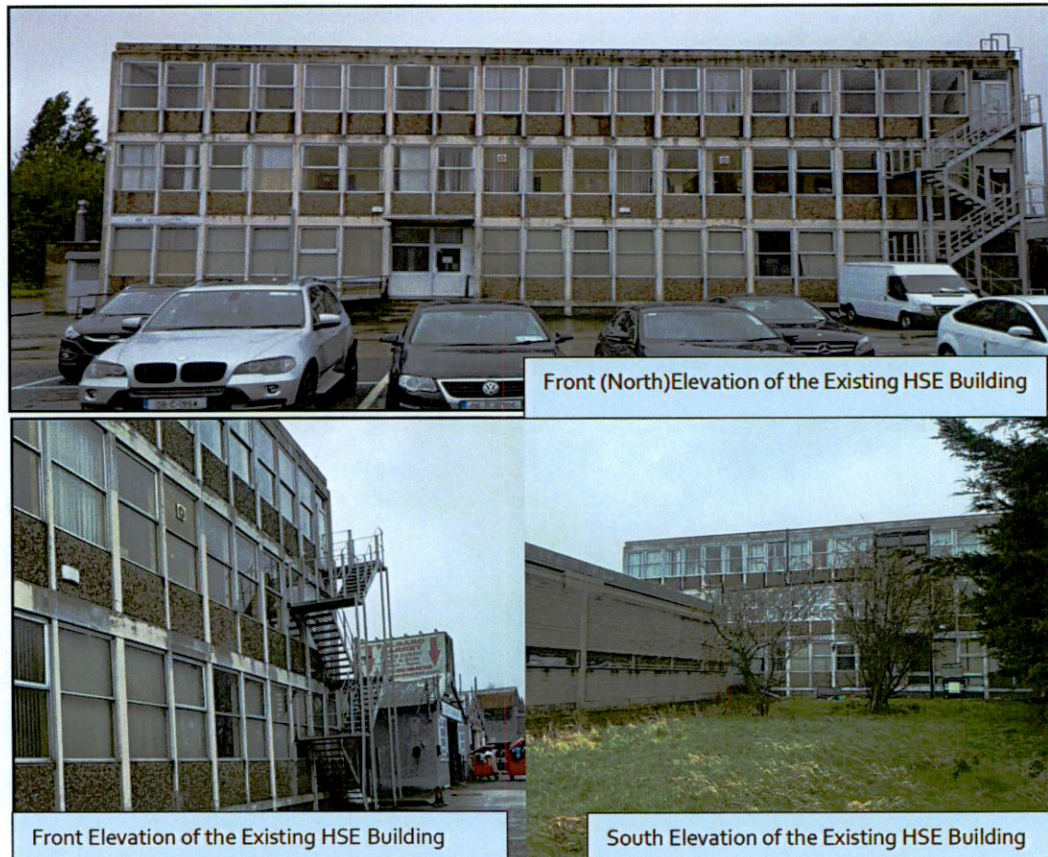
The ground floor of the existing vacant building principally comprises of 5 No. counselling rooms, 3 No. group rooms, a kitchen, male and female toilet facilities, and office ancillary space. The first floor consists of a pharmacy unit, a clinical nurse room, a waiting room, a washroom, a dining room, a conference room, 3 No. storage units and 5 No. office units. The second floor comprises a counsellor's room, a storage unit, 2 No. toilet facilities and 11 No. rooms.

There are 2 No. stair cores that serve the building. The building does not have a service lift or wheelchair/accessible facilities, except for a ramp at the front access to the building. The front entrance is accessible at the entrance to Glen Abbey Industrial Estate.



Figure 2.3: Subject Site Outlined in Red

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2022)



Front (North) Elevation of the Existing HSE Building

Front Elevation of the Existing HSE Building

South Elevation of the Existing HSE Building

Figure 2.4: The Existing HSE Building at Subject Site

(Source: AXO Architects, annotated by Thornton O'Connor Town Planning, 2022)

3.0 DEVELOPMENT RATIONALE

3.1 The National Ambulance Base Service

The HSE National Ambulance Service (NAS), is the statutory, national, pre-hospital emergency care provider and inter-hospital Transfer Service provider in the State. The NAS's mission is to serve the needs of patients and the public as part of an integrated health system, through the provision of high-quality, safe and patient centred services. Serving a population of almost 5 million people, the NAS responds to over 300,000 No. calls each year.

The NAS has over 1,600 No. staff across 100 No. locations and has a fleet of approximately 500 No. vehicles. In recent years the NAS has embarked on a strategic investment and reform programme in order to develop a modern, quality service that is safe, responsive and fit for purpose. The strategic changes underway in ambulance services mirrors that of international ambulance service modifications; to strive for the highest performance and efficiency in order to be capable of coping with the continuously increasing demand on services.

The National Ambulance Service (NAS) is the statutory pre-hospital emergency and intermediate care provider for the state. In the Dublin area, ambulance services are provided by NAS and Dublin Fire Brigade (DFB). The current service operates from over 100 No. locations throughout Ireland.

In 2018, the NAS:

1. Responded to over 340,000 No. emergency 112/999 and urgent calls;
2. Transported approximately 40,000 No. intermediate care patients;
3. Co-ordinated and dispatched more than 800 No. Aero Medical/Air Ambulance calls;
4. Completed 600 No. paediatric and neonatal retrievals; and
5. Continued to support and develop Community First Responder schemes.

In response to findings from a HIQA capacity report carried out in 2014, NAS have expanded the Service to meet response time targets (based on International best practice). An in-depth review was subsequently commissioned by NAS to analyse call volume and response data and determine the priorities of where additional resources were needed including the introduction of additional deployment points. It is noted from the detailed modelling exercise that *"there is scope to improve response times in major urban areas by the extended use of Rapid Response Vehicles as well as additional ambulances"*.

3.2 The National Ambulance Base Service at Belgard Road

The proposed ambulance base at Belgard Road will provide for both a local response and National Services. Following mapping assessments, reviews of options and requirements for the NAS, the HSE decided that in order to better serve and access South Dublin and environs, a new Dublin centred Ambulance Base would be required. The site location at Belgard Road, Tallaght was chosen due to its close proximity to Tallaght University Hospital (c. 1 km away) and Our Lady's Children's Hospital Crumlin (c. 6 km away).

This is also in accordance with the NAS strategy of relocating Ambulance Bases off the sites of Acute Hospitals, to new purpose-built facilities, situated in close proximity to clusters of existing

Acute Hospitals and other Healthcare facilities, a strategy which has been implemented in other locations throughout the country over the past number of years. The site at Belgard Road is in very close proximity to Tallaght University Hospital (c. a 3 No. minute drive away) as well as The Coombe Hospital, St. James' Hospital and Our Lady's Children's Hospital, Crumlin, as well as other Primary and Community Care facilities in the Greater Dublin Area. The site at Belgard Road also has excellent access to the Greater Dublin area, bordering counties Kildare and Wicklow as well as access to the urban centres and is near main inter-connecting junctions with M50, N81 and N7 main access routes.

National Service – NAS-CCR – Critical Care Retrieval Service

The Belgard Road location is optimally located to also accommodate NAS Critical Care Retrieval Service (NAS CCRS). This service is currently operating out of a temporary base at Cherry Orchard campus that is not fit for purpose. Essentially this service provides patient transfer for critical care Neo-Natal, Pediatric and Adult patients. This typically involves preparing and dispatching emergency ambulance vehicles, mobilising and collecting doctor and nurse support staff from the On-Call Teaching Hospitals and bringing this team to stabilise and transfer critically ill patients. The Patient Retrieval Service has evolved from a HSE-funded programme into a full HSE service managed through NAS. The nature of this service requires considerable space for staff, vehicles and equipment. The location for this service is an important consideration. There is scope and a likely evolution of this service with air ambulance services and a location with proximity to Casement Aerodrome, Baldonnell as well as the teaching hospitals is an important consideration. The Glen Abbey location provides this.

National Service – NEOC – Backup Location for Emergency Purposes

The National Emergency Operations Centre (NEOC) for ambulance services is a state-of-the-art service run from the National Ambulance Headquarter building in Tallaght Cross West. Given the critical nature of this service – receiving and responding to upwards of 1000 No. daily 999-calls - backup capacity and a physical location is needed. This backup facility is currently available in Ballyshannon, Donegal. The proposed development at Glen Abbey affords an opportunity to provide an alternative resilient location much closer to the main NEOC base at the Tallaght Cross location.

Local Service - South Dublin County Council / Tallaght Regional Base

NAS have been a long-term presence in Tallaght and are currently providing an ambulance service based in a leased warehouse facility located off Airton Road. Over the course of the last 10 years and in particular over the last 5 No. years, there has been continual pressure on this service arising from substantial increases in call volume and call complexity. This unprecedented demand has necessitated increased resourcing such that the current ambulance station is already past its maximum capacity and yet still additional resources are needed to meet current levels of demand. This demand is project to steadily increase with further population growth, particularly in the older person cohort.

The older person population of South Dublin is projected to almost triple in the next 20 No. years. Tallaght's 13 No. electoral divisions will likely see older populations quadruple. Furthermore, recent comprehensive household surveys indicate a very high prevalence of chronic disease. Over 50% of the 355 No. households surveyed in Tallaght's electoral divisions reported at least one household member with a chronic disease. The survey also indicated a very high dependence on hospital emergency department (ED) services with 40% of household members that formed

part of the survey visiting the hospital's ED in the preceding 12 No. months. Ambulance Services have evolved and play a fundamental part of the healthcare ecosystem and in particular as a first response for emergency care.

These reasons underpin the 'business need' to invest further in ambulance services within the South Dublin / Tallaght region. Best practice international ambulance services are based on both planned as well as reactive services with dynamic and real-time modelling used to support dynamic deployment of ambulance vehicles from a centralized hub location. The HSE and National Ambulance Service have identified the Glen Abbey location as a strategically optimal location to provide this hub location.

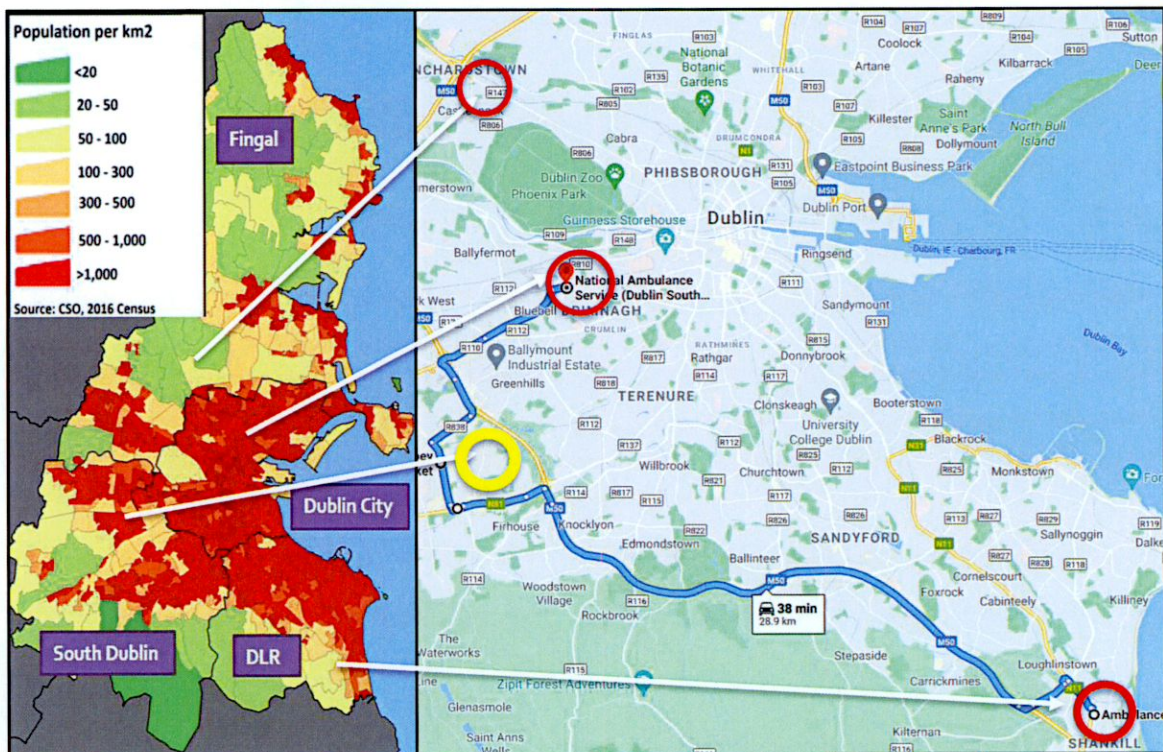


Figure 3.1: Demographics of The Grater Dublin Area (2016) Vs. Location of Existing (Indicated by Red Circles) and Proposed (Indicated by Yellow Circle) National Ambulance Bases

(Source: Google Maps & Census 2016, annotated by Thornton O'Connor Town Planning, 2022)

Due to the nature of the ambulance service and the life-saving importance of response times, a metropolitan service needs to be located within the urban centre. Adjacency to the major road networks is of fundamental importance. The Glen Abbey site meets and optimises the fundamental location criteria. The site offers the potential to provide an ambulance service that can grow and meet South Dublin's population needs. This is a very important strategic development for the National Ambulance Service supported and underpinned by an in-depth analysis of call volumes – effectively, this is a response to the identified needs of the community.

3.3 Function the National Ambulance Base and Daily Management of Operations

The proposed Ambulance Base will be an operational centre for NAS personnel, for the provision of a number of key NAS ambulance, first responder and other services for both the Greater Dublin Area as well as providing services nationally. The likely maximum staff on a given day-time shift is up to 25 No. staff personnel with up to 10 No. staff members as a likely maximum night-time staff level.

The proposed Ambulance Base building comprises welfare facilities for NAS personnel, including changing rooms, rest rooms, shower rooms, a kitchen, training rooms, conference rooms, offices and supervisor’s rooms. The proposal also includes a plantroom with facilities for vehicle repair and maintenance and storage rooms. The canopy extension provides 14 No. sheltered parking bays for the fleet vehicles. Other facilities at the subject site will comprise a vehicle power washing facility located at the south-western corner of the site. NAS staff and visitor car parking together with a bicycle shelter are located adjacent to the main part of the base and fleet parking areas.

The services that will be provided by the NAS, from the proposed Ambulance Base at Belgard Road, Tallaght are carried out by a number of dedicated fleet vehicles. Data analytic information demonstrates that there are currently approximately 30 No. Daily Emergency and Urgent Incidents across the Dublin Southwest region, a number of these calls would be dispatched to vehicles that are already in transit. Based on patient transfer data, the CCR numbers should be no greater than 1-2 No. dispatches per day. Hence up to 30 No. ambulance movements is a likely maximum. This is likely to remain relatively consistent as the projected future increase in demand for ambulance services will be managed through the introduction of additional vehicle deployment points served from a hub location similar to Glen Abbey.

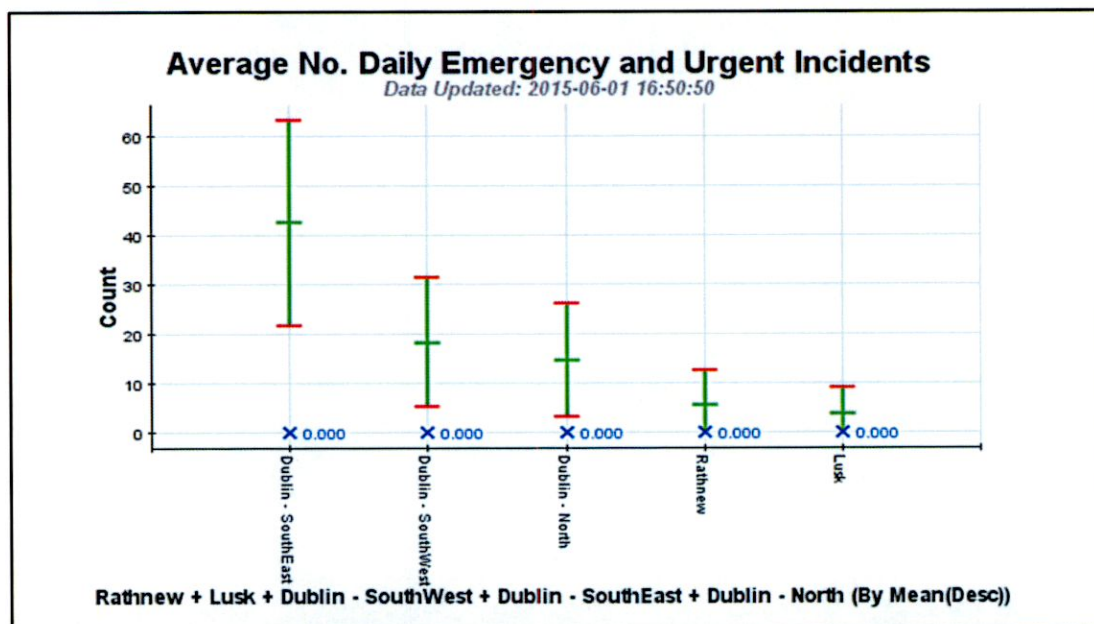


Figure 3.2: Average Number of Daily Emergency and Urgent Incidents for The Greater Dublin Area

(Source: HSE Data Analytics)

It is important to note that when all the fleet vehicles are parked at the base, only a number of these will be on shift at any given time. The fleet vehicles that will operate from the Belgard Road base will be carrying out routine and planned transfers and once deployed at the beginning of their shift they will be parked between transfers at the collection and delivery locations until the next transfer. The pattern of traffic movements for fleet vehicles, as well as for NAS personnel arriving and departing, to and from their shifts, are addressed in detail in the Traffic Engineer's Report that accompanies this Application.

3.4 Sustainability and HSE's *Pathfinder* Programme

This project is included on HSE's *Pathfinder* programme to meet public sector obligations for carbon reduction in accordance with the National Climate Action Plan. It is being developed with support from SEAI to develop a 'net of energy building with a focus on providing extensive on-site renewable energy generating measures (primarily photovoltaics) to match the energy consumption requirements of the building and achieve the lowest possible carbon footprint'.

4.0 PLANNING HISTORY

4.1 Planning History of Subject Site

A search of South Dublin County Councils Planning Application Database revealed that there has been no recent planning history at the subject site.

4.2 Overview of Relevant Planning History of Site Vicinity

The South Dublin County Council online planning search facility demonstrates the planning histories and planning applications in the site vicinity.

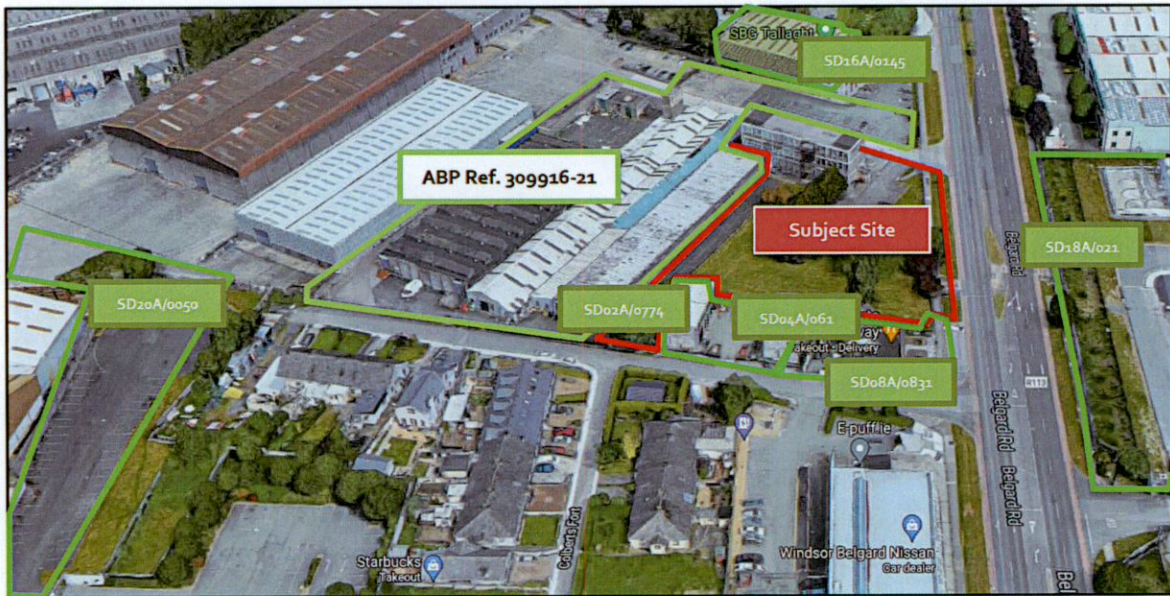


Figure 4.1: Planning History in the Vicinity of the Subject Site (Indicatively Outlined in Red)

(Source: Google Maps, Annotated by Thornton O'Connor Town Planning, 2022)

4.2.1: ABP Reg. Ref. 309916-21 – SHD Development of 170 No. Residential Units and 1 No. Creche at Glen Abbey Complex (Adjoining Site).

ABP Reg. Ref.:	PLo6F.309916
Location:	Glen Abbey Complex, Belgard Road, Cookstown Industrial Estate, Dublin 24, D24 W2XA, D24 RY1F
Application Date:	9 th April 2021
Development Description:	Demolition of the existing industrial and commercial office buildings totalling c. 4,628 sqm; Construction of a Build-to-Rent Housing Development comprising 170 No. apartment units and crèche arranged in 2 No. blocks across No. 4-7 storeys over basement car park; Internal communal amenity spaces at ground and fourth floor levels comprising reception, gym, lounge, cinema/tv room, events rooms and ancillary areas; No. 1 creche with associated outdoor play area at ground floor level; No. 73 car parking spaces comprising No.64 basement spaces, No. 4 accessible parking spaces and No. 5 visitor

	spaces at surface level; No. 354 bicycle spaces comprising No. 264 resident spaces at basement level and No. 90 visitor spaces at ground floor level; All associated plant including heating centres, gas room, water storage room, break tank room, comms room and bin storage at basement level, ESB substation and switch room at ground level and circulation spaces and stair and lift cores throughout; Vehicular/pedestrian access to the east from Belgard Road. All existing vehicular entrances serving adjoining sites maintained. Fire/emergency and refuse vehicle access and pedestrian access to the south from Colbert's Fort; All associated site development and infrastructural works, services provision, foul and surface water drainage, extension to the foul network, access roads/footpaths, lighting, landscaping and boundary treatment works.
Decision Date:	3 rd June 2021
ABP Final Grant Date	21 st September 2021
ABP Decision:	Grant Permission subject to 23 No. conditions

Under ABP.309916-21, permission was sought for the demolition of the existing industrial and commercial office buildings totalling c. 4,628 sqm and the construction of a Strategic Housing Development of 170 No. apartment units and 1 No. creche at a site at Glen Abbey Complex, Belgard Road, Cookstown Industrial Estate, Dublin 24, D24 W2XA, D24 RY1F.



Figure 4.2: Permitted SHD (ABP.309916-21) at Subject Site (Indicatively Outlined in Red) Vicinity

(Source: Extract from ABP Layout annotated by Thornton O'Connor Town Planning, 2022)

In their assessment, the Planning Inspector recommended a refusal of the proposed development based on the following reasons and considerations:

1. *The proposed development would materially contravene the policies and objectives of the Tallaght Town Centre Local Area Plan 2020 in respect of building height and plot ratio. Having regard to the provisions of this plan, which are considered to be reasonable, and the nature and scale of development proposed...*
2. *The Board is not satisfied that it has been satisfactorily demonstrated that adequate standards of residential amenity would be achieved in the proposed development, having regard in particular to the required Minimum Floor Areas and Standards set out in Appendix 1 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (December 2020). The proposed development would therefore be contrary to the proper planning and sustainable development of the area.*
3. *The proposed development would be premature pending the identification of the nature and scope of the upgrades and works that will be required to facilitate the connection of the proposed development to the water and wastewater networks in this area, along with any consents necessary, and to facilitate the regeneration of lands in this area, and the absence of certainty with regard the timeframe within which such constraints might reasonably be expected to be overcome. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.'*



Figure 4.2: Proposed SHD (ABP.309916-21) Development Adjacent to Existing Subject Site (Indicatively Outlined in Red)

(Source: Extract from ABP.309916-21, www.GlenAbbeySHD.ie, CGIs & Verified Views 3D Design Bureau VM No. 9)

The Board decided against the Planning Inspectors recommendation and decided to grant permission for the 170 No. unit Strategic Housing Development at the Glen Abbey site. Their Decision Report concludes the following:

'The Board considered that, subject to compliance with the conditions set out below that the development would constitute an acceptable quantum and density of development in this accessible urban location, would not seriously injure the residential or visual amenities of the area, would be acceptable in terms of urban design, height and quantum of development and would be acceptable in terms of pedestrian safety. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area. In coming to this conclusion, specific regard was had to the Chief Executive's Report from the planning authority.'

The Board considered that, while a grant of permission of the proposed Strategic Housing Development would not materially contravene a zoning objective of the statutory plans for the area, a grant of permission could materially contravene the Tallaght Town Centre Local Area Plan 2020.

The Board considered that the proposed development is, apart from the building height and plot ratio parameters, broadly compliant with the current South Dublin City Council Development Plan 2016-2022 and the Tallaght Town Centre Local Area Plan 2020 and would, therefore, be in accordance with the proper planning and sustainable development of the area.'



Figure 4.2: CGI of the Proposed SHD (ABP.309916-21) Development Adjacent to the Existing HSE Subject Site (Indicatively Outlined in Red)

(Source: Extract from ABP.309916-21, www.GlenAbbeySHD.ie, CGIs & Verified Views 3D Design Bureau VM No. 9)

On 21st September 2021, permission was granted by An Bord Pleanála for the SHD development at Glen Abbey Complex, Belgard Road, subject to 23 No. conditions.

4.2.2 SDCC Reg Ref. SDo2A/0774- Demolition of existing office unit and construction of new units.

SDCC Reg. Ref.:	SDo2A/0774
Location:	Colbert's Fort, Tallaght, Dublin 24
Application Date:	12 th December 2002
Development Description:	Demolition of existing single storey office/light engineering unit and the provision of 4 No. two-storey light engineering/office units in 2 No. blocks, revised entrances and front boundary wall.
Decision Date:	3 rd November 2003
Decision:	Grant Permission subject to 4 No. conditions

Under SDo2A/0774, permission was sought for the demolition of the existing office unit and the construction of 4 No. two-storey office units in 2 No. blocks, including the construction of a front boundary wall at a site in the vicinity (to the south) of the subject site. Permission for the proposal was granted, subject to 4 No. conditions, by ABP on 3rd November 2003.

4.2.3 SDCC Reg Ref. SDo4A/0613- Divide the existing restaurant/newsagent unit into 2 No. separate retail units and relevant refurbishment works.

SDCC Reg. Ref.:	SDo4A/0613
Location:	Dixons Restaurant and Newsagent, Belgard Road, Dublin 24
Application Date:	12 th August 2004
Development Description:	Permission for division of existing restaurant / newsagent into separate shop and sandwich bar, with new entrance door. Following receipt of Further Information amendments to the original proposal consists of the following additional development: Enlargement of existing shopfronts, replacement of shop signs, making of new window and rendering over brick exterior.
Decision Date:	28 th April 2005
Decision:	Grant Permission subject to 4 No. conditions

Under SDo4a/0613, permission was sought for division of the existing retail unit into 2 No. separate retail units and refurbishment works to the shopfronts. Permission was granted by SDCC subject to 4 No. conditions on the 28th April 2005.

4.2.4 SDCC Reg Ref. SDo8A/0831- Change of use of first floor residential unit into an office unit including new signage.

SDCC Reg. Ref.:	SDo8A/0831
Location:	Corner of Colbert's Fort & Belgard Road, Tallaght, Dublin 24.
Application Date:	9 th December 2008
Development Description:	Change of use of first floor 2 No. bed apartment into office and new signage to front at first floor level to a 2 No. storey retail/residential building.
Decision Date:	11 th February 2009
Decision:	Grant Permission subject to 8 No. conditions

Under SDo8A/o831, permission was sought the change of use from a residential unit to an office unit on the first floor of the building at the corner of Colbert's Fort and Belgard Road. Permission was granted by SDCC, subject to 8 No. conditions, on 11th February 2009.

4.2.5 SDCC Reg Ref. SD16A/o145- Change of use of existing warehouse to gym use and upgraded signage works.

SDCC Reg. Ref.:	SD16A/o145
Location:	Glen Abbey Complex, Belgard Road, Dublin 24
Application Date:	29 th April 2016
Development Description:	Change of use of 711sq.m of the existing warehouse floor area to a gym use, together with the provision of a 147sq.m internal mezzanine level existing the first floor of the building into the existing warehouse space; the provision of illuminated signage to the front and side of the existing warehouse building with all associated and ancillary works.
Decision Date:	10 th June 2016
Decision:	Grant Permission subject to 8 No. conditions

Under SD16A/o145, permission was sought the change of use from an industrial warehouse unit to a gym facility and upgraded signage at Glen Abbey Complex, Belgard Road. Permission was granted by SDCC, subject to 8 No. conditions, on the 10th June 2016.

4.2.6 SDCC Reg Ref. SD18A/o219- Construction of a large Industrial building and demolition of existing building on site.

SDCC Reg. Ref.:	SD18A/o219
Location:	Former Jacob's/Allied Biscuits Site, Belgard Road, Tallaght, Dublin 24, D24 DA27
Application Date:	13 th June 2018
Development Description:	(1) The construction of a new two storey c.23,283sq.m building for use as data storage facilities containing: data storage rooms, electrical & mechanical plant rooms and support areas including offices and welfare facilities, loading bays, back-up generators and water storage tanks, mechanical plant at roof level is screened from view on all sides by permanent screens; (2) 27 No. car parking spaces; (3) amendment to previously permitted site landscaping, boundary treatment and associated site infrastructure (planning permission Reg. Ref. SD16A/0093) and (4) the demolition of a single storey building (floor area of 310sq.m).
Decision Date:	20 th September 2018
Decision:	Grant Permission subject to 23 No. conditions

Under SD18A/o219, permission was sought the demolition of the existing building on site and the construction of a data storage building, and all associated site works at the Former Jacob's/Allied Biscuits Site at Belgard Road. Permission was granted by ABP after an appeal withdrawal, subject to 23 No. conditions, on the 20th September 2018.

4.2.7 SDCC Reg Ref. SD20A/0050- Construction of a 3 No. storey apartment building containing 6 No. apartment units.

SDCC Reg. Ref.:	SD20A/0050
Location:	Colbert's Fort, Belgard Road, Tallaght, Dublin 24.
Application Date:	24 th February 2020
Development Description:	Three storey apartment building containing six apartments with external terraces/private gardens (3 No. x two bed & 3 No. x three bed duplex) & one end of terrace two storey house (two bed), landscaping of site and play area, footpath, bin stores, eight car parking spaces, eighteen bicycle parking spaces and all associated site works.
Decision Date:	18 th January 2021
Decision:	Grant Permission subject to 20 No. conditions

Under SD20A/0050, permission was sought the construction of a 3 No. storey apartment building containing 6 No. apartment units, landscape works, and all associated site works at Colbert Fort, Belgard Road, Tallaght. Permission was granted by SDCC, subject to 20 No. conditions on 18th January 2021.

4.3 Summary of Planning History

The planning history of the surrounding area demonstrates that South Dublin County Council have been favourably disposed to the development of the 'REGEN' zoned lands surrounding the subject site. The proposed development will retain and retrofit the 3 No. storey building into a modern standard to be one of Ireland's first Carbon Neutral HSE buildings and National Ambulance Base.

It is our professional planning opinion that the development subject to this Planning Application is appropriately located, scaled and designed with low-impact boundary treatments and respect for the existing environment at the site.

5.0 DETAILS OF THE PROPOSED DEVELOPMENT

5.1. Description of Proposed Development

The proposal principally includes the refurbishment of the existing building and the construction of a new stair tower at the northern boundary of the site, a new 3 No. storey stair core to the south, a 2-storey plant element and a new 1 No. storey wing extension to the south, including an upgraded fire escape and wheelchair accessible lift at the southern stair core.

The principal one storey extension will be used as a garage for the ambulances and other vehicles, to pull into the building and get replenished and restocked. This is a sheltered area with PV roofs which generate solar energy and power the building with sustainable, re-useable energy. The proposal includes 14 No. ambulance parking bays to the south of the building alongside a 1 No. storey power washing station which includes a jet power-wash. There will also be an addition and upgrades of staff car parking spaces to include 12 No. car parking spaces and sheltered bicycle parking spaces. The green landscaped area of the site which encompasses 3 No. mature trees is to be retained on the site. The main site entrance and exit is to be retained onto the main access road.

This proposed refurbishment of the building will improve the utility and sustainability of the building and offer an improved health service to the South Dublin area as well as country-wide, while serving the nearby Tallaght University Hospital (c. 1.4 km away from the existing site entrance), whilst also providing a good example of sustainable retrofits and carbon neutrality of public service buildings for the HSE and nationwide.

Works also comprise some site developments, including new fencing, access gates, parking area and a covered ambulance canopy area with adjacent power washing station.

It is anticipated that structural works to the existing building will be minimal. The proposed alterations to the existing layout will not affect the structure for the most part. Works may include slight modifications to existing doorways and the removal of some partition walls. The proposed external works to the existing building comprise the upgrading and improving of the thermal envelope, including the insulation and new cladding systems, however it is not anticipated that these works will unduly affect the underlying structure.

A new stairwell will be provided separate to the existing structure to the Northern elevation, with a minimalist link and access to the existing building. Additional works to facilitate the access to the existing building include new steps and access ramp.

5.2 Key Site Statistics

Floor Level	Existing (Sq m)	Demolition (Sq m)	New Build (Sq m)	Total Area (Sq m)
Ground Floor	309	8	328	629
First Floor	317	16	119	420
Second Floor	317	16	70	371
Total	943	40	517	1,420

Table 1: Schedule of Existing and Proposed Gross Floor Area (sq m)

(Source: AXO Architects, 2022)

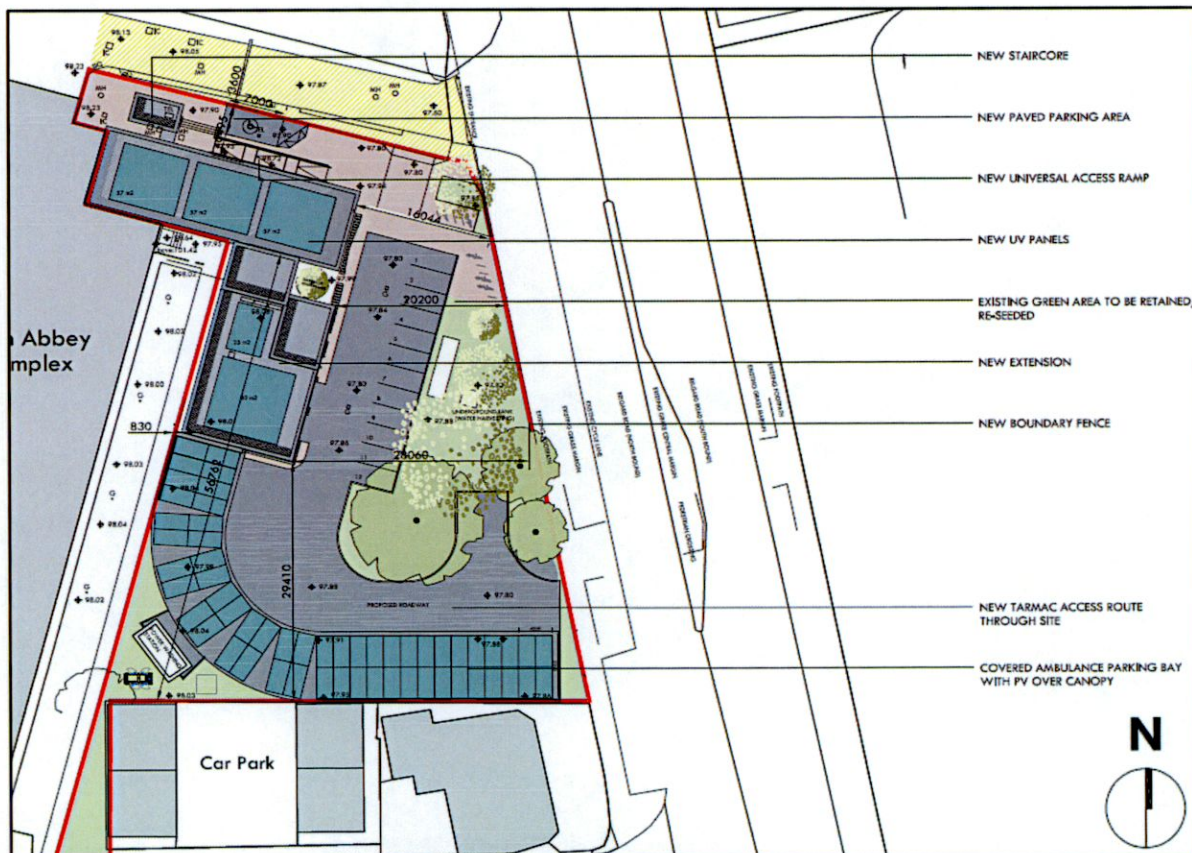


Figure 5.1: Proposed Site Plan for the HSE Ambulance Base

(Source: AXO Architects, Drawing No. P (01)09)

The Architects Design Statement, prepared by AXo Arhitects and submitted with this planning application states the following regarding the propsoed design of the development:

'The main existing structure will be retained and reconfigured to accommodate the extensive brief. We note the requirement to house not only local level uses but also to provide training essential to the service nationwide. A single storey extension is proposed to the back to accommodate the garage and all ancillary spaces related to the ambulances, their maintenance, supplies and plant.'

This results in a linear, almost abstract building that connects to the ambulance canopy, through a rhythmic colonnade, providing a "podium" to the new development in its background. In a way, it becomes the human scale footstep between the Belgard Road and the high rise, high density behind it, whilst bringing relief and daylight to the city fabric.

The proposed development focuses on the importance of renewing an existing structure, it modernizes and improves it. It ensures an essential service while utilizing this central location within a sustainable integrated use. It keeps a service for the people, amongst the people.'



Figure 5.2: CGI of the Proposed National Ambulance Base along Belgard Road (the permitted Glen Abbey SHD development is shown indicatively in grey for reference)

(Source: AXO Architects, Drawing No. P (01)23)



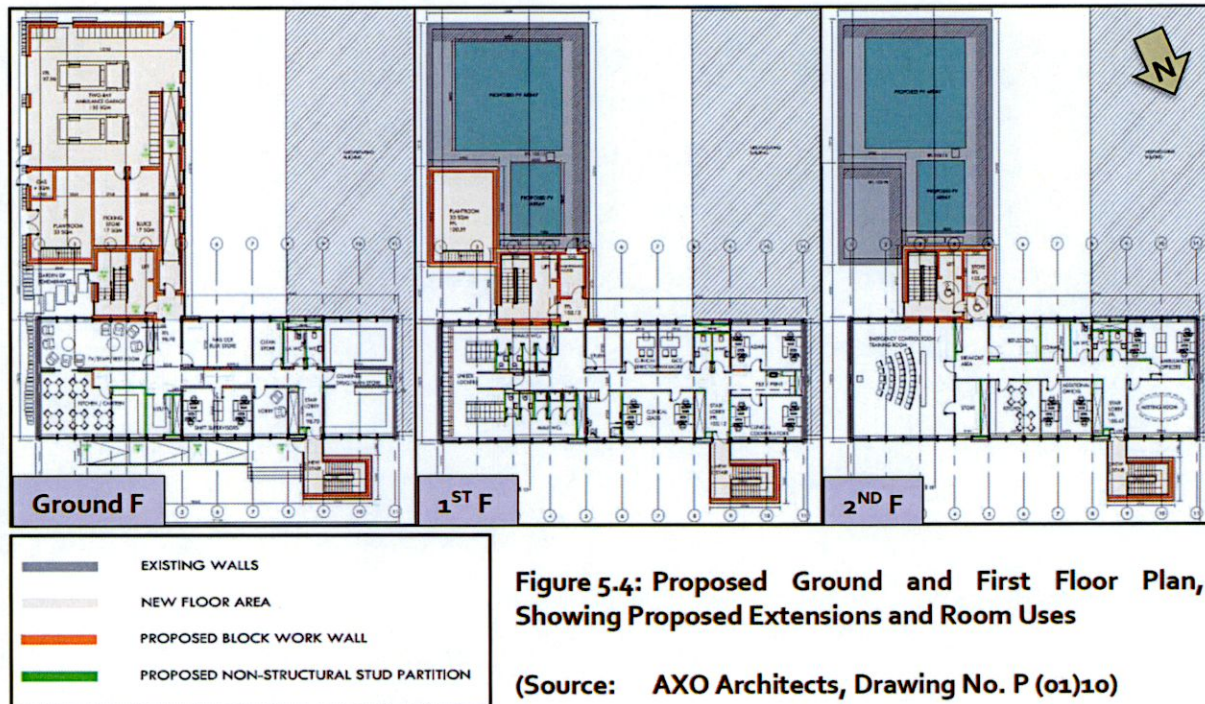
Figure 5.3: CGI of the Proposed Ambulance Parking Bays

(Source: AXO Architects, Drawing No. P (01)22)

5-3 Works to the Interior

The interior of the existing HSE building will undergo partial demolition of some interior walls and the construction and provision of new block work walls and non-stud partitions to provide a new internal floor plan. The extended floor plans of the 3 No. storey proposed National Ambulance Base development will comprise the following uses:

<p>Ground Floor Level</p>	<ul style="list-style-type: none"> • Two-bay internal ambulance garage with associated gas storage compound. • PE bag and AP Medical bag storage. • Plant room. • Picking store. • Sluice Room. • TV/Staff/Rest Room. • Kitchen/Canteen. • General Store. • NAS/CCR bulk store. • Combined drug store and main store. • Utility. • Cleaner's store. • UA WC and male female WC. • Shift Supervisors. • New Part M compliant lift and stairs.
<p>First Floor Level</p>	<ul style="list-style-type: none"> • Unisex lockers, incorporating separated male and female WCs and showers. • Tea station / room. • Study room. • Clinical director office. • Clinical leads office (2 person). • Clinical coordinators office (2 person). • GCC Manager's office. • Admin office (4 person). • Paramedic Supervisor's office (4 person). • Male and female WCs.
<p>Second Floor Level</p>	<ul style="list-style-type: none"> • Emergency control / Training room. • Staff kitchen. • Comms room. • Cleaner's store. • Meeting room. • Reflection room. • Ambulance officer's office (2 person). • Hot desk / Overspill offices (2 person).
<p>External</p>	<ul style="list-style-type: none"> • Staff car parking. • Covered and serviced ambulance bays. • Ambulance washing bay. • Plant areas. • Memorial garden.



5.4 Works to the Exterior

The proposed design and redevelopment of the building proposes to retain as much of the existing structure as possible. The windows on the existing façade will be mostly left intact and retained and are aluminium and single-glazed. Whilst the frame of the existing building is being retained, new façade treatments are proposed.

The new extension will comprise a combination of steel frames, masonry walls and precast units to the roof and intermediate areas. The steel frames will be required to provide an open plan, unobscured area for the two-bay ambulance garage. Some steel beams will also be provided to the plant room to form a mezzanine level. The roof structure has been designed as a precast concrete hollow core unit roof to facilitate the installation of plant and/or solar panel systems on the roof of the new extension.

All internal walls will comprise 215mm loadbearing solid masonry wall panels, and all external cavity walls will similarly comprise a 215mm inner leaf with a masonry external leaf with various finishes or cladding to the Architect's details. Below Figure 5.3 and Figure 5.4 show the elevational differences between the existing and proposed buildings at their southern elevation:

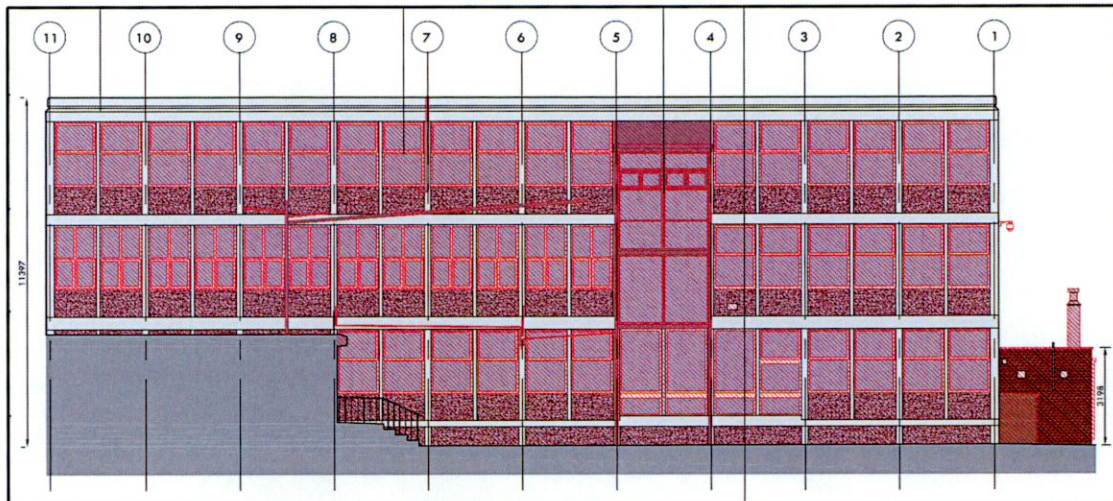


Figure 5.5: Existing Building Southern Elevation

(Source: AXO Architects, Drawing No. P (01)07)

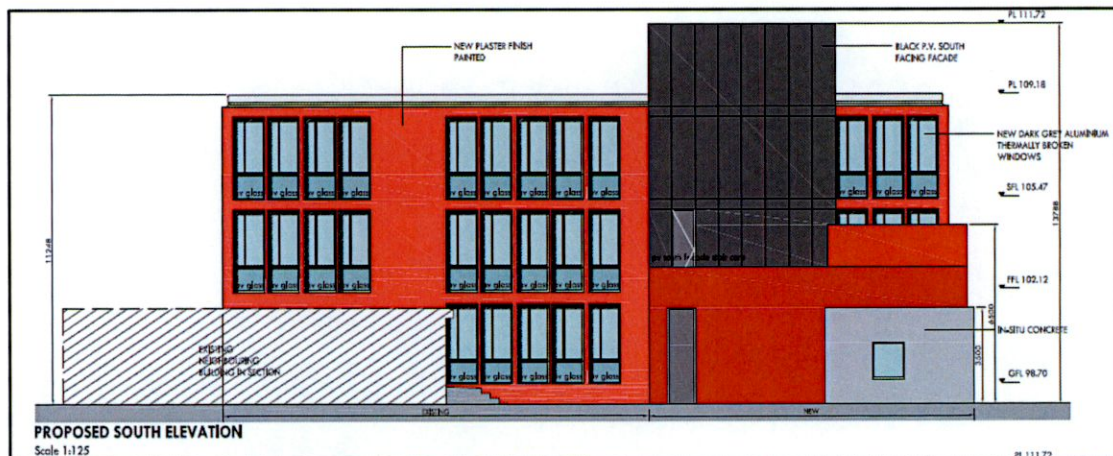


Figure 5.6: Proposed Building Southern Elevation

(Source: AXO Architects, Drawing No. P (01)14)

The proposed ambulance canopy structure will be formed using a series of fabricated steel frames with trusses forming the main cantilevered roof. The frames will provide an unobstructed shelter to the ambulance parking area, with a sheltered, enclosed walkway along the western side of the building providing access to the main building. The canopies will be constructed with a power washing station directly adjacent in order to provide washing and cleaning facilities for each vehicle.

Additional Civil and Structural site works will also include the construction of RC slab or plinth bases for M&E services and fuel storage, the allowance for new boundary walls and a new bespoke steel fence, a new rolling gate access with a bespoke steel design to match the fencing, new hardstand parking facilities and the installation of a new attenuation system and rainwater harvesting system.

5.5 The Neighbouring Strategic Housing Development – Glen Abbey SHD (Permitted under ABP Ref. 309916)

The permitted SHD development under ABP Ref. 309916-21 at Glen Abbey proposes to build 170 No. build-to-rent units with associated residential amenity areas and creche arranged in 3 No. blocks across 4-7 No. storeys over basement at the adjacent Glen Abbey site, at the western boundary of the subject HSE building.



Figure 5.7: CGI of the Proposed Building (Northern Elevation) from Belgard Road

(Source: AXO Architects, Drawing No. P (01)25)

The figure below is an extract from the permitted site plan layout drawing prepared by C+W O'Brien Architects and submitted under ABP Ref. 309916-21, demonstrating the boundary distances between the existing (and to be retained) 3 No. storey HSE building and the proposed 7 No. storey blocks at the western boundary of the neighbouring site.

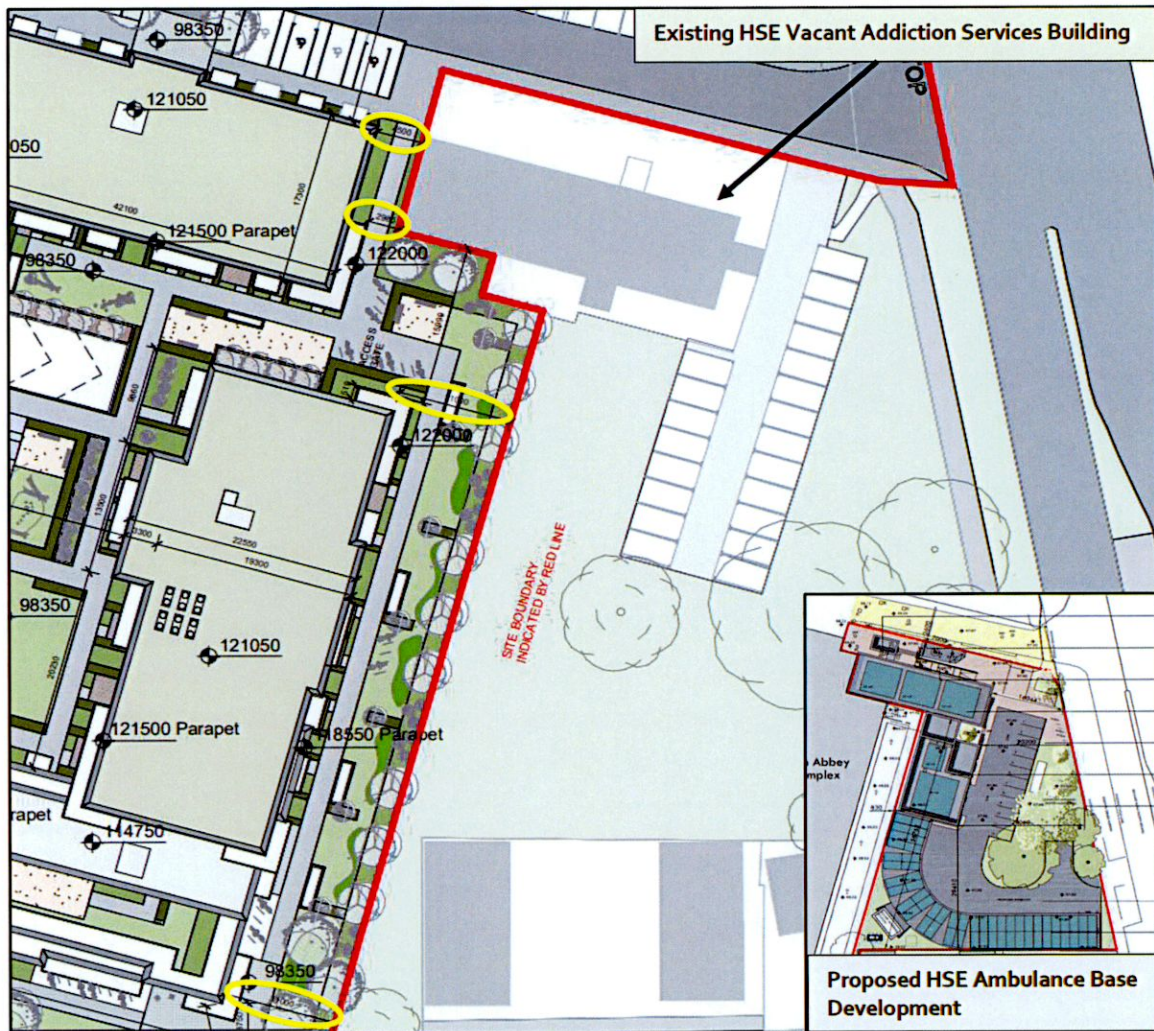


Figure 5.8: Site Layout (Roof) Plan for the Permitted Glen Abbey SHD Demonstrating the Boundary Distances between the Existing HSE Building and the Adjacent Proposed Development (Annotated Boundary Distances Indicatively Circled in Yellow)

(Source: Extract from ABP Ref. 309916, C + W O'Brien Architects, annotated by Thornton O'Connor Town Planning, 2022)

5.5.1 The Proposed Western Façade

The western façade of the building (which fronts the adjacent permitted Glen Abbey SHD) is shown on *Drawing No. P (01)14* submitted with this planning application. The majority of the proposed extension along the western boundary is single storey whilst the proposed 3 No. storey stair-core extension to the existing HSE building should not have any negligible impact on the permitted 7 No. storey residential development at the western boundary as it will be bounded by an open space area permitted under ABP Ref. 309916-21. The distance of open space between the proposed 3 No. storey extension, which just comprises a staircore and the permitted 7 No. storey block can be measured at c. 11 metres (as shown in Figure 5.8 above).

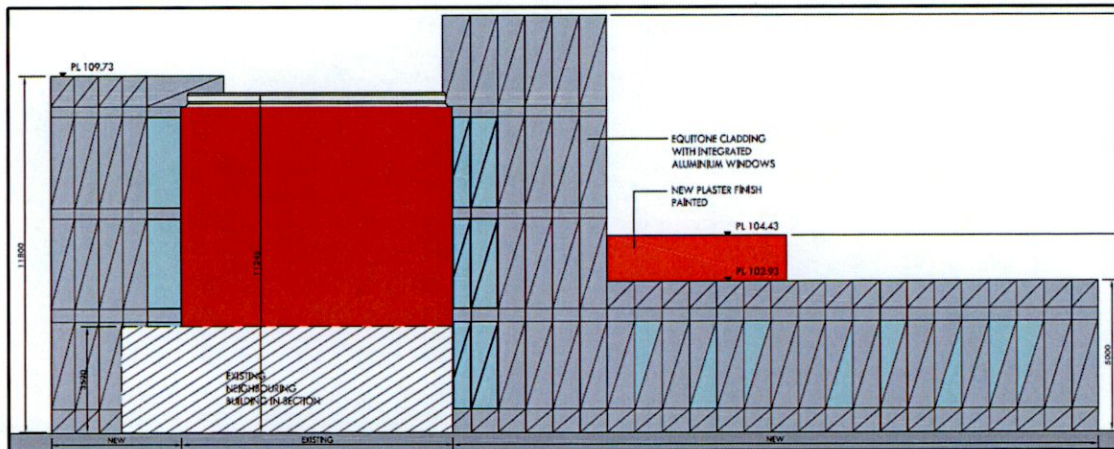


Figure 5.9: Proposed Building Western Elevation

(Source: AXO Architects, Drawing No. P (01)14)

The proposed western elevation is designed to have windows along the ground floor elevation. Windows that are proposed at first and second floor level are placed at the stair core, which looks into the open space. These can be opaque if required.

The western elevation will be screened by landscaped boundary treatments such as tall trees and hedgerows to prevent overlooking and to protect the residential privacy and amenity of the permitted neighbouring SHD Glen Abbey development, as shown in the extract from the Landscape Masterplan (*Drawing No. 19140-1-101*) submitted under the SHD application ABP Ref. 309916 in Figure 5.10 below. The extract shows that the permitted development proposes to plant soft boundary treatments at their eastern boundary adjacent to the HSE building and proposed extension site. The Landscape Masterplan of the adjacent site proposes c.9 No. trees of c. 5 metres in height and hedgerows of c. 4 metres in height along their eastern boundary (the proposed HSE extension western boundary), this will provide appropriate screening between the two adjacent developments.

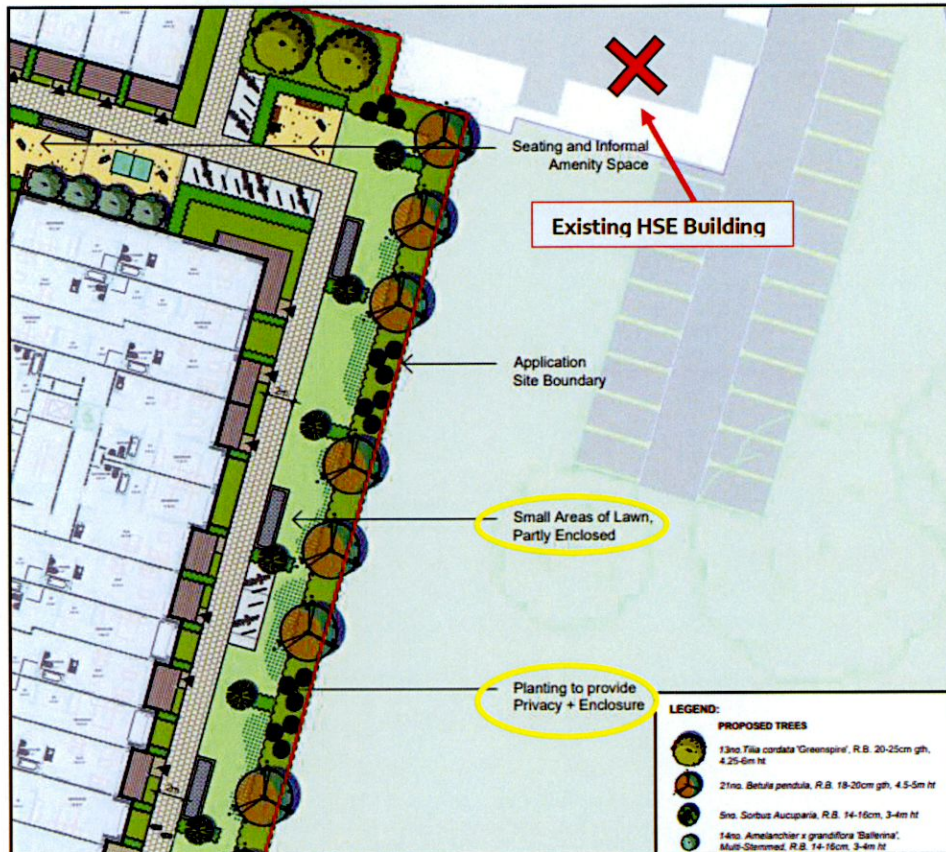


Figure 5.10: The Subject Site Western Boundary Landscaped Screening between the Adjacent Site and the Proposed Extension

(Source: Extract from the Landscape Masterplan, Drawing No. 19140-1-101 under ABP Ref. 309916, annotated by Thornton O'Connor Town Planning, 2022)

The design rationale of the proposed HSE building development has been discussed and outlined by the design team in meetings with the developers and design team members of the adjacent permitted Glen Abbey SHD before the SHD was lodged, and it is our understanding that the proposed design of the development has been discussed and agreed with the Glen Abbey SHD team in previous meetings, with no issues or concerns arising from the proposed HSE building development design.

5.6 Aviation Assessment

As shown above in Figure 5.8, the closest boundary distance is between the existing 3 No. storey subject HSE building and the proposed 7 No. storey 'Block A', measuring 2.9 metres apart, with the furthest distance between the buildings measured at 11 No. metres apart at the proposed 7 No. storey 'Block B' and proposed 4 No. storey 'Block C', at the eastern boundary.

This planning application does not include an Aeronautical Assessment Report with the submitted documents for the proposed National Ambulance Base as only one element of the development very marginally increases about the height of the existing 3 No. storey building, which is being extended.

We note the proximity of the adjacent Glen Abbey SHD development at the western boundary (minimum c.2.9 metres distance), which proposes heights of up to 7 No. storeys with no issue raised around the aeronautical issue and as such we can reasonably infer that there can be no aeronautical impacts from the proposed development.

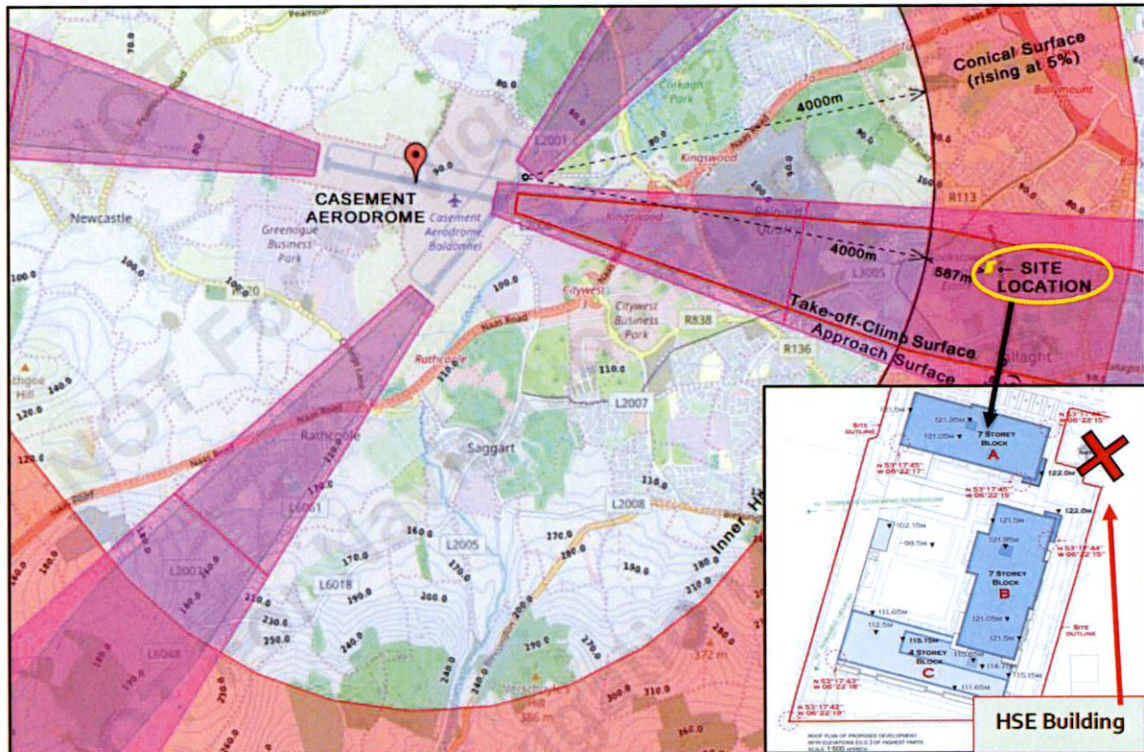


Figure 5.9: Conical Surface Calculations at Casement Aerodrome Map (Glen Abbey Site Indicatively Annotated in Yellow on Map), featuring the proposed Roof Plan Layout at the Glen Abbey Site (Subject HSE Site Annotated for Reference)

(Source: Extract from ABP Ref. 309916, Aeronautical Assessment Report prepared by O'Dwyer Jones Aviation, annotated by Thornton O'Connor Town Planning, 2022)

The Aeronautical Assessment Report prepared by O'Dwyer & Jones Design Partnership Aviation Planning & Architecture Consultants for the Glen Abbey SHD application under ABP Ref. 309916 dated November 2020, Section 12 states the following conclusion to their assessment:

'12.1 Approach & Take-Off Climb Surfaces

The Approach Surface to Casement's Runway 28 and the Take-off Climb Surface from its Runway 10 are the significant Obstacle Limitation Surfaces in relation to this site, and the proposed development lies substantially lower than both of these surfaces, i.e. its highest element (on Block A) lies at 81 metres below the Approach Surface, and at 68 metres below the Take-off Climb Surface.

The development is also 30.4m lower than the 1.2% slope above which it would be required for a structure to be notified as a potential obstacle on aeronautical charts.

12.2 Conical Surface

The Conical Surface, while being a less significant Surface than the Approach or Take-off Climb Surfaces, is the lowest of the three Obstacle Limitation Surfaces at Casement Aerodrome lying above this site. However, this Conical Surface (sloping upwards at 5%) lies at 41.65m above the highest point of the proposed development on this site, and is unaffected by it.

12.3 Tallaght Hospital Helipad

The proposed development is at sufficient distance from the hospital helipad that it will not interfere with helicopter operations to/from this helipad. While this helipad is not a 'heliport', Approach and Departure Surfaces – to any of the three ICAO slopes (for all categories of helicopter) – can readily be provided above the proposed building.

12.4 General

*We consider that **the proposed residential development at the former Glen Abbey site complies with all aviation and aeronautical requirements affecting the site.** [Our Emphasis]*

Therefore, we can conclude that the results of the Aeronautical Report prepared by O'Dwyer Jones Aviation in November 2020 for the proposed Glen Abbey development (with proposed buildings of up to 7 No. storeys in height), also applies to the subject HSE proposed National Ambulance Base site (with existing and proposed heights of up to 3 No. storeys) at Glen Abbey Estate.

6.0 PLANNING POLICY CONTEXT

The local planning context for the proposed development is determined by the 'National Planning Framework (NPF) Project Ireland 2040' at a national level, the 'South Dublin County Development Plan 2022-2028' which was adopted on 3rd August 2022 at county level and the 'Tallaght LAP 2020-2026' at local level.

6.1 The National Planning Framework (NPF) Project Ireland 2040

6.1.1 National Access to Quality Health Services

The proposed development of a National Ambulance Base at a HSE owned site in Tallaght, located just c. 1.4 km away from Tallaght University Hospital, will serve the South Dublin area, the wider Dublin area as well as the hinterlands of Dublin (e.g., other populated areas in Co. Kildare, Co. Meath, Co. Wicklow), including emergency ambulance service at other hospitals country wide.

Our childcare, education and health systems will need to plan ahead in order to meet the implications of an additional one million people by 2040. The National Planning Framework (NPF) Project Ireland 2040 states the following policies for implementing improved emergency health service in Ireland.

National Strategic Outcome No. 10 on Acute Hospital Services

- *'Building additional capacity designed for maximum effectiveness and targeted at enhancing ambulatory care and elective care, to reflect the scale of population growth and ageing, in line with identified service needs.'*
- *'Reconfiguration of acute services within hospital groups; Expansion of the Ambulance fleet and expanded ambulance bases to support prehospital care and timely access to critical services. As part of this, consideration will need to be given to how access to air support can be improved into the future.'*

Therefore, the proposed development supports the NPF and is in accordance with the National Strategic Policies on improving access to quality health services nationwide.



Figure 6.1: Hierarchy of Settlements and Related Infrastructure, Highlighting the Importance of Emergency Health Service Infrastructure (Purple) in Populated Areas.

(Source: The National Planning Framework, Project Ireland 2040)

6.1.2 Sustainable Infrastructure and Moving Towards a Carbon Neutral Economy

In relation to Climate Action and Sustainable Infrastructure, the NPF states:

'In line with Ireland's Climate Change mitigation plan, we need to progressively electrify our mobility systems moving away from polluting and carbon intensive propulsion systems to new technologies such as electric vehicles and introduction of electric and hybrid traction systems for public transport fleets, such that by 2040 our cities and towns will enjoy a cleaner, quieter environment free of combustion engine driven transport systems.'

The National Climate Policy position establishes the national objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. This objective will shape investment choices over the coming decades in line with the National Mitigation Plan and the National Adaptation Framework. New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, harnessing reusable energy sources such as solar energy and connecting the richest sources of that energy to the major sources of demand.'

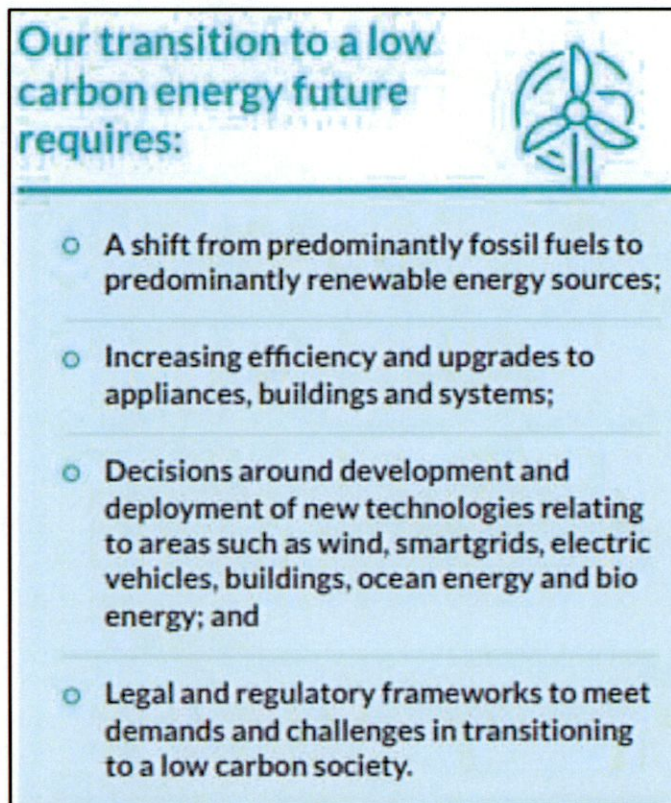


Figure 6.2: The NPF Strategies for Transitioning to a Low Carbon Energy Future

(Source: The National Planning Framework 2018, Project Ireland 2040)

The retrofitting of the existing building at the subject site to include PV glass and solar energy infrastructure, this development proposal makes this development a carbon-neutral and sustainability model for Ireland’s Health Service in improving their buildings and infrastructure to become more energy efficient and working towards achieving the goal of carbon-neutrality by 2050.

The following *NPF* policies are relevant in the context of the proposed development:

National Policy Objective No. 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 No. 54

‘Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.’

National Policy Objective No. 55

'Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.'

The proposed development supports National Policy in providing sustainable regeneration to the industrial area at the subject site in Tallaght, that accommodates changing roles and functions and enhances the levels of amenity and design quality which sustainably influences and supports the South Dublin area and the national Health Service system in regenerating and implementing sustainable energy infrastructure to more healthcare services.

6.2 South Dublin County Development Plan 2022-2028

6.2.1 Zoning

According to the *South Dublin County Development Plan 2022-2028*, the application site is zoned Objective 'REGEN', where the stated objective 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.'

'Employment and Residential in Regeneration Zones' set out in the *South Dublin County Development Plan 2022-2028* outlines how the Council recognises that there are a high level of vacant lands of poor environmental quality throughout the county, and that they will seek to support and facilitate a more intensive mix of enterprise and/or residential led development in 'REGEN' zoned lands, in particular in instances where the regeneration relates to underutilised industrial lands that are in close proximity to town centres and public transport nodes.

The zoning matrix included in Schedule 5 of the Development Plan indicates 'permitted' and 'open for consideration' uses in various zones. Permitted in principle uses are generally acceptable subject to the normal planning process and compliance with the relevant policies and objectives, standards and requirements set out in the Plan. The Permitted in Principle uses outlined for the 'REGEN' zoning include the following:

Permitted in Principle Uses:

*'Advertisements and Advertising Structures, Childcare Facilities, Community Centre, Education, Enterprise Centre, **Health Centre**, Home Based Economic Activities, Hotel / Hostel, Housing for Older People, Industry-Light, Live-Work Units, Motor Sales Outlet, **Office-Based Industry**, **Office less than 100 sq m**, **Offices 100 sq m-1,000 sq m**, **Offices over 1,000 sq m**, Open Space, Petrol Station, **Public Services**, Recreational Facility, Residential, Restaurant / Café, Residential Institution, Science and Technology Based Enterprise, Shop-Local, Sports Club / Facility, Stadium, Traveller Accommodation, Work-Live Units.'* [Our Emphasis]

Open for Consideration Uses:

'Allotments, Bed & Breakfast, Betting Office, Boarding Kennels, Car Park, Crematorium, Cultural Use, Doctor / Dentist, Embassy, Funeral Home, Garden Centre, Guest House, Hospital, Industry-General, Nursing Home, Off Licence, Place of Worship, Primary Health Care Centre, Public House, Recycling Facility, Retail Warehouse, Retirement Home, Service Garage, Shop-Neighbourhood, Social Club, Veterinary Surgery, Warehousing, Wholesale Outlet.'

From a zoning perspective, the building's existing Healthcare Services use and proposed refurbishment and intensification of use to offer a National Ambulance Base to serve the Tallaght University Hospital in close proximity to the site (c. 1.4 km away), is not listed in the land-use zoning matrix for the 'REGEN' zone 'permitted in principle' uses due to its very specific use but is most closely aligned with a 'health centre' use.

However, as an 'other use', it will be assessed as per the County Development Plan in accordance with the 'REGEN' zoning objectives with a rationale for a health centre with ancillary offices and staff facilities that will provide a positive attribution to the development of the county and the Tallaght Town Centre Local Area and most importantly provide a critical health facility for Tallaght and beyond.

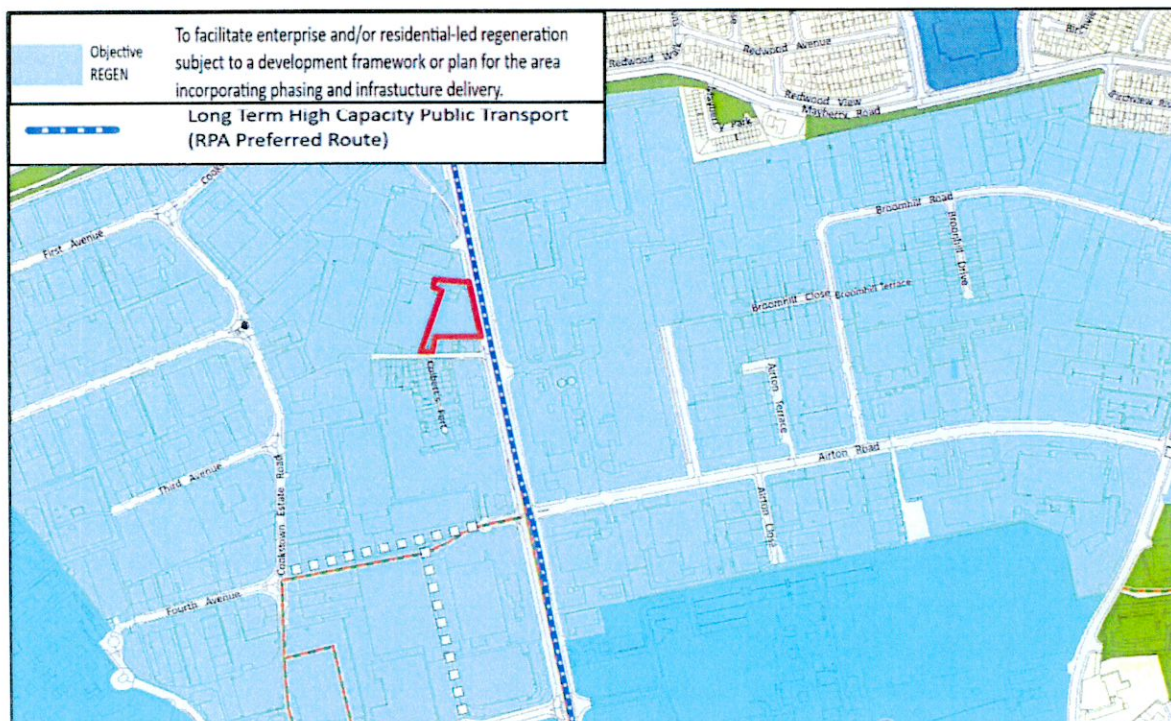


Figure 6.3: Zoning Map of Subject Site with Site Outlined in Red

(Source: South County Dublin Development Plan 2022-2028, Zoning Map No. 9, annotated by Thornton O'Connor Town Planning, 2022)

The following policies are relevant in the SDCC Development Plan 2022-2028:

Policy CS4: Active Land Management	
<i>Facilitate the re-use and regeneration of vacant sites and landbanks through various measures to promote compact urban growth in line with the Core Strategy.</i>	
CS4 Objective 4	<i>To secure funding from appropriate sources, including central government funding mechanisms, to secure the delivery of National Strategic Outcomes under the National Planning Framework.</i>

Policy CS7: Consolidation Areas within the Dublin City and Suburbs Settlement	
<i>Promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary.</i>	
CS7 Objective 1	<i>To promote more intensive population and employment uses focussing on good community, civic and school facilities, good quality streets and spaces whereby existing and new neighbourhoods are knitted together alongside essential infrastructure and amenities that are required to develop sustainable communities and employment within the key urban centres, consistent with RPO 4.3.</i>
CS7 Objective 2	<i>To promote and support the regeneration of underutilised industrial areas designated with the regeneration Zoning Objective 'REGEN' (to facilitate enterprise and / or residential led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery).</i>

6.2.2 Healthcare Infrastructure Policy

The South Dublin County Development Plan 2022-2028 states that the Council will continue to encourage the expansion of services at Tallaght Hospital and the development of synergies between related uses in the Plan lands.

Policy COS6: Healthcare Facilities	
<i>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.</i>	
COS6 Objective 1	<i>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.</i>
COS6 Objective 2	<i>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</i>

	<i>locations that are accessible by public transport, walking and cycling.</i>
COS6 Objective 3	<i>To support the provision of appropriately scaled healthcare facilities within existing settlements, in locations that are accessible by public transport and safe walking and cycling infrastructure.</i>
COS6 Objective 4	<i>To support the provision of primary care facilities with relevant agencies, in accordance with the standard of one facility per 7,000-10,000 population as identified by the Department of Health.</i>

6.2.3 Sustainable Infrastructure Policy

It is the policy of the South Dublin County Council to promote the development of solar energy infrastructure in the County, in particular for on-site energy use, including solar PV, solar thermal and seasonal storage technologies, used in projects such as this proposal. Such projects and developments like this proposal for a carbon neutral HSE National Ambulance Base at Belgard Road Tallaght are to be considered subject to environmental safeguards and the protection of natural or built heritage features, biodiversity and views and prospects.

Policy E7: Solar Energy

'Promote the development of solar energy infrastructure in the County, including the building of integrated and commercial-scale solar projects subject to a viability assessment and environmental safeguards including the protection of natural or built heritage features, biodiversity and views and prospects.'

E7 Objective 1:

'To encourage and support the development of solar energy infrastructure for on-site energy use at appropriate locations in the County.'

E7 Objective 2

'To encourage and support the development of commercial-utility solar energy infrastructure for local distribution at suitable locations in the County.'

Having regard to all of these policies, we can conclude that that the proposed development for an extension to the existing HSE building to provide a National Ambulance Base service while returning the vacant existing building to good use, is in accordance with all relevant and adopted policies, and thus represents the proper planning and sustainable development of this site.

6.3 Tallaght Town Centre LAP 2020-2026

6.3.1 Healthcare Services and Infrastructure

The Tallaght Local Area Plan Infrastructure Audit recommends that:

'The Planning Authority should liaise with the HSE to ensure that the scope of services provided are adequate to meet identified local service gaps and that it is sufficiently resourced to cater for the future needs of the projected population in the area.'

The potential need for additional GP services to serve the LAP area should be kept under review, having regard to the roll out of the LAP. With respect to health, the lead agents for delivery will consist of developers, the Health Service Executive (HSE) and South Dublin County Council (SDCC).'

It is clear that the proposed ambulance base is a very specific and critically important facility that is not covered under general policy considerations, and it has been set out above why this location is required and eminently suitable for the subject proposal and importantly why this is the right and necessary location for the proposed use.

6.3.2 Design Criteria

The *Tallaght Town Centre LAP 2020-2026* includes sustainable design criteria for all new development *'should seek to be as energy efficient as possible by utilising renewable energy sources and passive solar design techniques.'*

This development proposal for the HSE National Ambulance Base at Belgard Road Tallaght is a model for sustainable development design and retrofitting for future health service facilities in Ireland. Section 3.0 above has detailed the use of the proposed facility and the associated staff numbers.

6.3.3 Noise Pollution

With regards to noise pollution and mitigation in the *Tallaght Town Centre Local Area Plan 2020-2026*, it states the following:

'Development proposals with the potential to give rise to significant noise impacts may require a Noise Impact Assessment and mitigation plan to minimise noise disturbances and protect the amenities of the area. The Planning Authority will promote and require proposals to demonstrate the principles of good acoustic design and implement the Professional Practice Guidance (ProPG).'

Furthermore, the provision of appropriate mitigation measures for existing areas adjacent to major noise sources is supported and will be considered having regard to the visual amenity and the proper planning and sustainable development of the area.'

RSK have prepared a Noise Report to accompany the application recommending mitigation measures that should be put in place during the construction and operation of the scheme. In respect of the specific issue of ambulances using the site, the report notes:

'During the operation phase of the development, up to 30 No. ambulance movements per day are expected at peak level. The sound of ambulance emergency sirens can be expected to be audible as the emergency vehicles enter the R113 Belgard Road to the north of the site, when the road network is sufficiently busy such that the emergency sirens are required. Thus, it is anticipated that the sirens should not need to be turned on as frequently after peak evening traffic or overnight when the traffic levels will be much lower than the peak daytime periods. Thus, based on the HSE's experience of ambulance movements, sirens are much more likely to be required between the hours of 8am and 7pm, where they are less likely to disturb nearby properties.'

The sound of emergency sirens is a requirement both in terms of reducing the Health and Safety risk to other road users, and to allow for a fast response and arrival of paramedics to the destination site. Therefore, due to the critical nature of the services offered by emergency vehicles that exit from this development, conducting a noise impact assessment of siren noise is not appropriate.

Deliveries will take place during normal working hours (09:00 - 17:30hrs). National Ambulance Service consumables are generally small components delivered via a transit-type van approximately once per week. On-site storage facilities mitigate against the need for frequent deliveries to the site. Deliveries are therefore not expected to cause any significant noise impact.'

The Noise Impact Assessment Report by RSK Group is submitted with this planning application.

6.6 Conclusion

Having regard to the policies and standards prescribed at local level, it is considered that the proposed development fully complies with all relevant policies of the *South Dublin Development Plan 2022-2028* and the *Tallaght Local Area Plan 2020-2026* and can be considered to represent the proper planning and sustainable development of the area.

7.0 DOCUMENTS SUBMITTED AS PART OF THIS APPLICATION

The following documents and related drawings are enclosed as part of this application:

Planning Fee

- The proposed development is considered exempt from paying planning fee under Article No. 157 in S.I. No. 600/2001 - *Local Government (Planning and Development) (Fees Exemptions) Regulations, 2001*, as it is considered a development that is by a voluntary organisation and is not to be used mainly for profit or gain.

Planning Report

- Six copies of this Planning Report prepared by Thornton O'Connor Town Planning, dated 9th November 2022.

Planning Application Form

- A duly completed current South Dublin County Council Planning Application Form signed and dated 9th November 2022.

Notices

- An original page of the *Daily Star* dated 8th November 2022 in which notice of the application has been published pursuant to article 17(1)(a) of the *Planning and Development Regulations, 2001-2019*.
- One copy of the Site Notice dated 8th November 2022 and erected or fixed on the land or structure pursuant to article 17(1)(b) of the *Planning and Development Regulations, 2001-2019*.

Sustainability

- A *Stage 2A Environmental Analysis report* prepared by IN2 Engineering Design Partnership Ltd, dated 2nd November 2022.

Daylight/Sunlight

A Sunlight and Daylight Analysis Report, prepared by IN2 Engineering Design Partnership Ltd, dated 1st November 2022.

Transport Assessment Report

- Six copies of a *Transport Assessment Report* including a *Preliminary Mobility Management Plan* and *Stage 1 Road Safety Audit*, prepared by NRB and dated 13th October 2022.

Glint & Glare Assessment

- Six copies of a *Glint & Glare Assessment Report* prepared by Modelworks and dated October 2022.

Noise Assessment Report

- Six copies of a *Noise Impact Assessment* prepared by RSK Group Ltd and dated 4th October 2022.

Appropriate Assessment Screening

- Six copies of an *Appropriate Assessment Screening Report* prepared by Enviroguide Consulting Engineers and dated 2nd November 2022.

Engineers Reports and Drawings

- Six copies of a *Civil / Structural Report Planning Report* prepared by CHH Civil & Structural Consulting Engineers Ltd and dated 20th October 2022.
- Six copies of a Flood Risk Assessment g prepared by CHH Civil & Structural Consulting Engineers Ltd and dated 20th October 2022.
- Six sets of the requisite plans at the appropriate scales are provided by CHH Civil & Structural Consulting Engineers Ltd

DRAWING NO.	DRAWING TITLE	SIZE	SCALE
21-082-C-01	Site Location Map	A1	1:100
21-082-C-02	Proposed Drainage & Watermain Layout	A1	1:200
21-082-C-10	Typical Attenuation Details	A1	As Shown
21-082-C-11	Rainwater Harvesting System	A1	1:25

Architects Drawings and Report

- Six sets of the requisite plans at the appropriate scales are provided by AXO Architects along with a Design Statement.

DRAWING NO.	DRAWING TITLE	SIZE	SCALE
P(01)01	Site Location Map	A3	1:1000
P(01)02	Existing Site Layout Plan	A3	1:500
P(01)03	Existing Ground Floor Plan - Demolition Works	A3	1:100
P(01)04	Existing First Floor Plan - Demolition Works	A3	1:100
P(01)05	Existing Second Floor Plan - Demolition Works	A3	1:100
P(01)06	Existing North Elevation - Demolition Works	A3	1:100
P(01)07	Existing South Elevation - Demolition Works	A3	1:100
P(01)08	Existing East Elevation & Section A-A - Demolition Works	A3	1:100
P(01)09	Proposed Site Layout Plan	A3	1:500
P(01)10	Proposed Ground Floor Plan	A3	1:125
P(01)11	Proposed First Floor Plan	A3	1:125
P(01)12	Proposed Second Floor Plan	A3	1:125
P(01)13	Proposed Elevations	A3	1:125
P(01)14	Proposed Elevations	A3	1:125
P(01)15	Proposed Sections	A3	1:100

P(01)16	Proposed Ambulance Canopy	A3	Varies
P(01)17	Proposed Fence and Gates	A3	Varies
P(01)18	Power Washing Station	A3	1:100
P(01)19	Context Elevation (for information)	A3	1:500
P(01)20	CGI	A3	N/A
P(01)21	CGI	A3	N/A
P(01)22	CGI	A3	N/A
P(01)23	CGI	A3	N/A
P(01)24	CGI	A3	N/A
P(01)25	CGI	A3	N/A
P(01)26	Context Elevation	A1	1:200



8.0 CONCLUSION

In our professional planning opinion, the proposed development works to facilitate a critically important National Ambulance Base at Glen Abbey Complex, Belgard Road can be assimilated into its receiving environment and fully accords with National, Regional, and Local planning policies.

The proposed works will return this largely vacant building to use and will be a significant improvement to the site in terms of providing a modern carbon-neutral and climate-conscious retrofit and lead the HSE's effort in reducing harmful emissions. The national Ambulance Base facility will be a critical healthcare facility for the locality, for Dublin and for the Country people have access to the highest quality healthcare.

It is our professional planning opinion that the proposed development represents the proper planning and sustainable development of this site.

We trust you will find this application in order.

If you require any further information, please do not hesitate to contact us.

Yours sincerely,

Patricie Thornton

Patricia Thornton
Director
Thornton O'Connor Town Planning

