

Senior Administrative Officer,
Planning Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24,
D24 A3XC.

February 2023

Dear Sir/Madam,

We, Brock McClure, Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin, have been instructed by the Applicant, **Bartra Property Cookstown Limited, 3rd Floor Longphort House, Earlsfort Centre, Dublin 2** to lodge this **Further Information Response** to South Dublin County Council in relation to the proposed development at **Unit 21, First Avenue, Cookstown Industrial Estate, Dublin 24.**

On 10 November 2022, South Dublin County Council requested Further Information regarding 18 no. items relating to the planning application registered under Reg. Ref. SD22A/0361. This response is made within 6 months of the request for further information on or before 9 May 2023.

This further information response and accompanying documentation was prepared by the following design team members in conjunction with the Applicant:

- EML Architects (EML)
- Brock McClure Planning & Development Consultants (BMC)
- OCSC Consulting Engineers (OCSC)
- Áit Landscape and Urbanism (Áit)
- J.V. Tierney M&E and Lighting Consultants (JVT)
- Enviroguide Ecologists (Enviroguide)

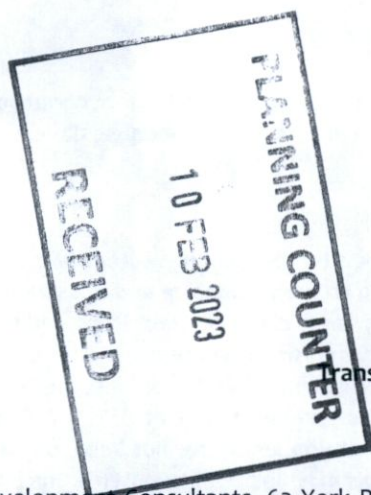
We enclose the following documentation herewith for assessment as part of this Response:

No	Items	Consultant	No. of Copies
1.	Planning Cover Letter	BMC	6
2.	Revised Architect's Drawings and FI Response	EML	6
3.	Revised Engineer's Drawings, Report and FI Response	OCSC	6
4.	Revised Landscape Drawing, Report and FI Response	Áit	6
5.	Revised Lighting Drawing and Report	JVT	6
6.	Response relating to Heatnet	JVT	6
7.	Invasive Alien Species Management Plan	Enviroguide	6
8.	Bat Activity Survey Report	Enviroguide	6
9.	EIA Screening Report	Enviroguide	6

We note that this scheme, revised by way of a response to this Further Information request, remains fully compliant with the requirements and policy objectives of the South Dublin Development Plan 2022- 2028 and the Tallaght Local Area Plan 2020. It is our considered view that this response is not considered significant for the purposes of re-advertisement of the statutory notices.

We trust the Planning Authority will examine all material submitted herewith in reviewing the amended proposal for this site.

A response to the Further Information Request is now set out below for the convenience of the Planning Authority. We consider that all items have been adequately addressed to the satisfaction of the Planning Authority.



Further Information Response

SDCC Reg. Ref. SD22A/0361

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

Further Information Response

The Further Information Response now submitted demonstrates that careful attention has been paid to the issues raised by the Planning Authority and all concerns have been positively addressed, with relevant technical assessments.

Item 1

“Notwithstanding the land-use zoning for the site, the Planning Authority has significant concerns in relation to the suitability of the proposed use having regard to the sequencing and phasing provisions set out in the Tallaght LAP. These provisions favour the development of lands closer to Luas Stops and the Town Centre first, unless sites are sufficiently large (over 2ha) to create their own distinct identity/character and amenity. The LAP clearly articulates the need to avoid piecemeal development and isolated sites. In addition, the LAP sets out infrastructure requirements and open space provision that are needed for the development of the CTC sub-neighbourhood within which the subject site is located. These infrastructure requirements have not been fully delivered or designed and as such the Planning Authority is concerned the proposals may be premature. While the provision of temporary pedestrian and cycle linkages as part of these proposals is noted, the Planning Authority requests a more fulsome consideration of the foregoing. Additional information is requested in this regard. In particular, the Applicant may wish to consider additional site assembly to increase the area of land under its control so that it exceeds 2ha. In addition the Applicant is requested to provide details of the specific use of the sites that adjoin the subject site and of lands that lie directly across the public road from the subject site.”

Applicant Response:

In response to Item No. 1, we note that the project design team has endeavoured to address the Planning Authorities concerns in relation to the suitability of the proposed use having regard to the sequencing and phasing provisions set out in the Tallaght LAP.

We refer to Figure 1 below which graphically represents land uses surrounding the subject site. From our site visit on 3 January 2023, it is understood that all commercial properties to the south and west are fully operational.



Figure 1: Surrounding site use

The Cookstown Industrial estate has been zoned for regenerative development by South Dublin County Council. It is considered by the Applicant that where a Local Authority has designated an area for regeneration where sites are under multiple ownerships that they are best placed to lead on site assembly given their authority to take control of lands by means of Compulsory Purchase Order.

It is not possible for the applicant to amalgamate sites due to the existing commercial activities present to the west and south. Furthermore, the sites to the west and south are in separate ownership. We note that there is no known planning legislation that mandates Applicants engage with other landowners regarding site assembly.

We note that the site to the immediate east on Cookstown Road as shown on Figure 1 is currently being used for residential purposes by up to 200 people. We draw the Planning Authority's attention to the fact that residents are successfully accessing facilities and services at Tallaght Town Centre and Belgard Luas Stop. This building can also be seen on figure 2 below.

Notwithstanding the above, upgrades to infrastructural services such as pedestrian connections to the town centre and luas are set out in the application documents submitted to the Planning Authority and in this further information response.

Figure 2 below shows the current condition of the pedestrian areas surrounding the development site and depicts the lack of cycle infrastructure. The subject proposal to provide interim upgrade works to the pedestrian and cycle areas will greatly improve the existing infrastructure in place, which is currently characterised by high curbs, bollards, and undulating pedestrian walkways in poor repair.

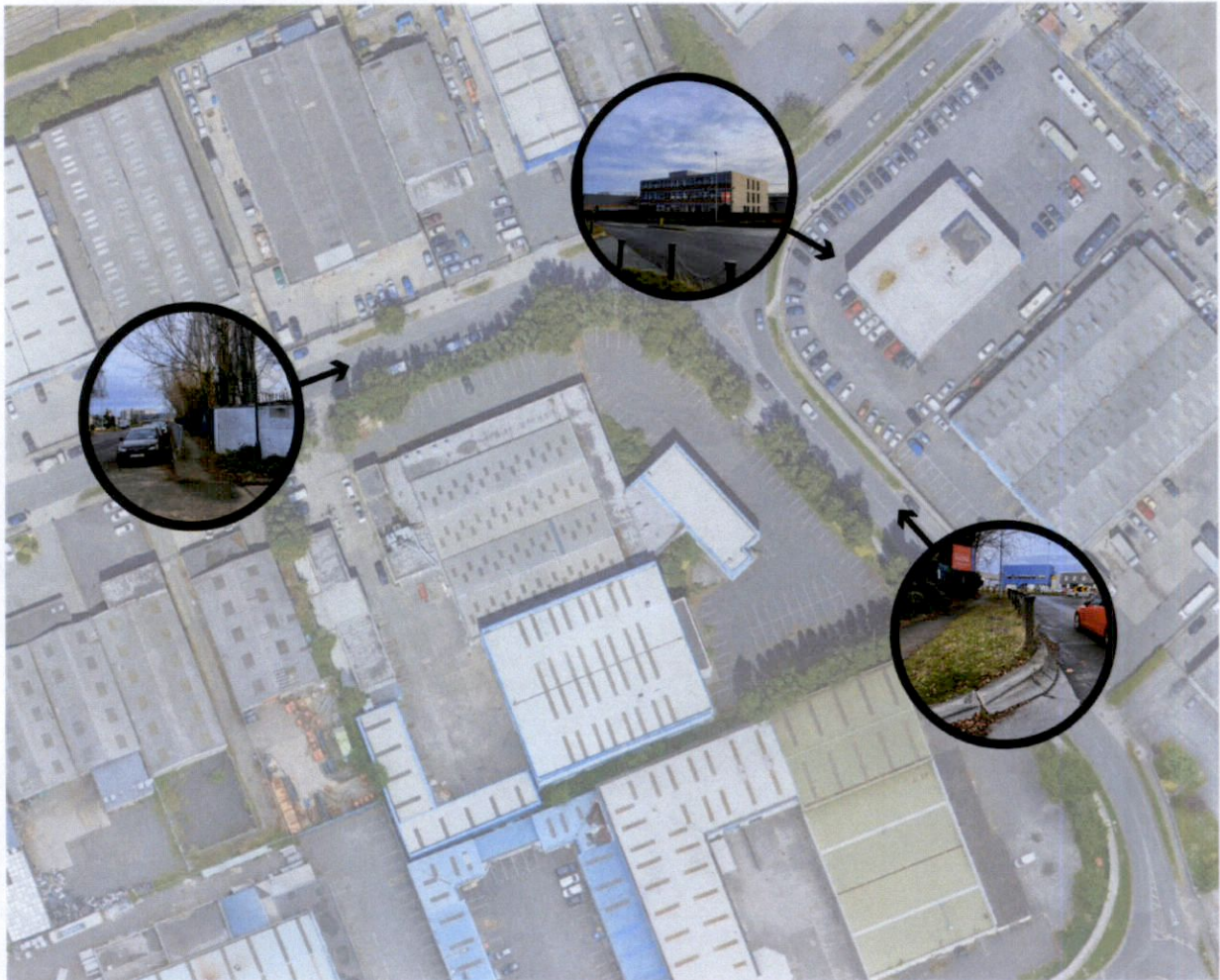


Figure 2: Existing surrounding site conditions

Figure 3 below shows infrastructural upgrades that have taken place as part of the provision of the new link road connecting Cookstown Road to Tallaght Town Centre to the south of the site.

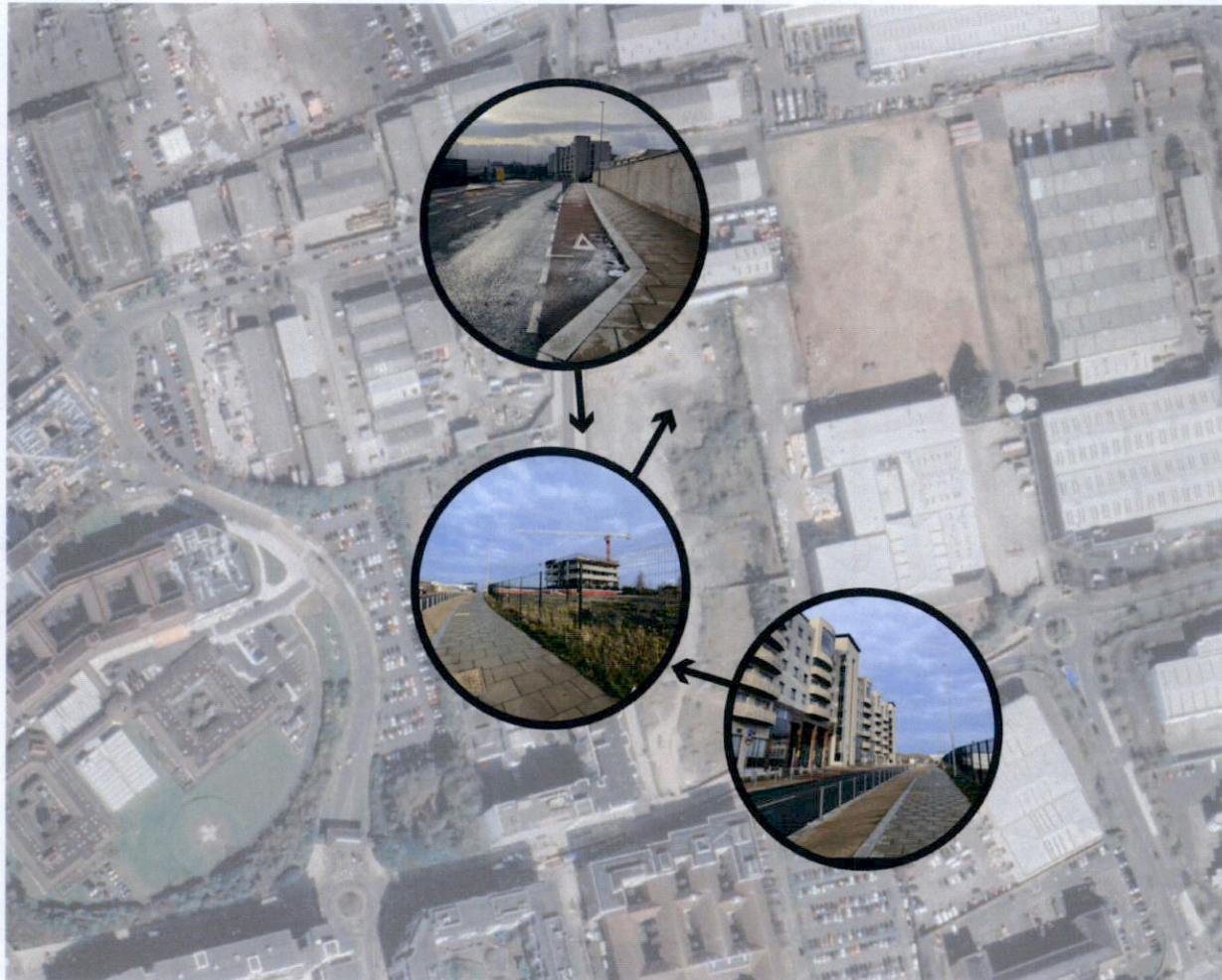


Figure 3: Infrastructural Upgrades associated with New Link Road

It is considered that the construction of the link road to the south of the development site represents the first stage towards increased pedestrian connectivity throughout the Cookstown Regeneration Area. New footpaths and cycle lanes are provided as part of this road. The proposed development will further increase pedestrian and cycle connectivity along the Cookstown Road, and in tandem with the granted Cookstown Cross SHD to the south of the development site will offer improved pedestrian and cycle conditions will be provided the length of the Cookstown Road.

The Applicant has decided to proceed on the basis originally proposed to provide interim upgrade works to pedestrian and cycle infrastructure toward both the Belgard Luas Stop to the northeast of the site and to the south of the site along Cookstown Road connecting to Tallaght Town Centre.

This solution offers increased connectivity for pedestrians and cyclists to public transport at the Belgard Luas and services and amenities at Tallaght Town Centre in the interim period.

It is noted that the South Dublin Active Travel Plan is due to be published which will identify the areas where upgrade works are required within the Tallaght Area. It is considered that if the Applicant carries out full upgrade works towards the Belgard Luas Stop that there is the possibility that these may need to be reversed depending on the content of the final Active Travel Plan.

Given that there are grants available to Local Authorities for the provision of cycle and pedestrian facilities it is considered by the Applicant that it is possible that South Dublin County Council will carry out required permanent upgrade works within the next 3-5 years which will negate the need for proposed interim upgrade works.

It is also considered that if permanent pedestrian and cycle upgrades are provided at this early stage of the regeneration of the Cookstown area, they will likely need to be amended to facilitate other regeneration applications that will be lodged to SDCC in the future.



We draw the Planning Authority's attention to the Board's assessment of sequencing and phasing in the previous application Ref. SD21A/ / ABP Ref. ABP-311568-21 which stated the following:

*“The subject site is currently surrounded by industrial uses but there is a large development site immediately to the east which had a recent refusal of planning permission under ABP-309731-21 for a development of 1,104 no. apartments. **Development within the LAP area needs to start somewhere. I don't consider it expedient to wait for sites in preferred locations to become available for development when fully serviced sites are available within 500m of a Luas stop and bus stops.** There are also a number of extant permissions within the surrounding area, and it is reasonable to expect that these developments will be delivered imminently.”*

“Should the Board be minded to grant permission for the development, I recommend that a planning condition be attached that requires the applicant to engage with the PA with a view to providing connections to and from the site on a short-term basis which would also integrate with the long-term strategy for the wider area.” (Own emphasis)

It is therefore considered that interim upgrade works are more appropriate at this stage of the regeneration of the Cookstown area as these can be easily reversed to align with future regeneration projects and/or the goals and objectives of the final SDCC Active Travel Plan, as required.

We trust the above response addresses the issue to the satisfaction of the Planning Authority.

Item 2

Transitional Care Facility Use

The Planning Authority is not satisfied with the information provided in relation to the use of the transitional care facility. The Applicant is requested to provide detailed information in relation to the proposed use, including but not limited to, the number of staff, the likely profile of residents, the anticipated duration of stay for residents related to the number of bedspaces proposed, for example whether any long-term stays are intended and what proportion of bedspaces would be for same, anticipated visitor numbers connected with in-patient care, the connection between the care facility and local hospitals and how this would operate in practice, further details on the specialised dementia care unit, the number of people using the mobile diagnostic facilities as outpatients.”

Applicant Response:

In response to Item No. 2, we refer the Planning Authority to a similar healthcare development at Beaumont Lodge, Kilmore Road, Artane, Dublin 5, developed by the Applicant.

Following surgery and treatments for accidents or major illnesses in an acute hospital, it is often necessary for patients to spend a further period of recovery in a transitional facility before returning home or to another healthcare facility. The purpose-built facility with a capacity of 221 bedspaces works closely with Beaumont Hospital to provide step-down care to patients transitioning from the acute hospital setting to the home.

The proposed development at Cookstown has been specifically chosen and designed to provide the step-down transitional services to Tallaght Hospital.

Having regard to the close proximity of the site to Tallaght Hospital, the proposed development is the ideal location for such a proposal.

We note the following key information relating to future staff and patients:

- The number of staff – There are approx. 130 staff, at maximum occupancy, however these are broken into three main shifts. The night shift is covered by a maximum of 20 staff at full occupancy.



- The likely profile of residents – The patients are not generally considered as residents, rather they are patients who are transitioning home or to another facility once they are rehabilitated and back to their baseline where possible.
- The anticipated duration of stay for patients related to the number of bedspaces proposed – this is forecast to be approx. 30 days in accordance with our facility at Beaumont Lodge, Kilmore Road, Artane. However, the duration of stay will often depend on the length of Fair Deal process.
- Whether any long-term stays are intended and what proportion of bedspaces would be for same – the facility may have a separate unit for long-term care with 28 beds, with an expected length of stay of approximately 3.5 years. Some of these patients will have complex dementia and high dependency needs and will generally be in a position to leave the facility.
- Anticipated visitor numbers connected with in-patient care – it's very difficult to forecast visitor numbers, however it could be estimated at two per patient, mostly at weekends.
- The connection between the care facility and local hospitals and how this would operate in practice – Connections have already been made with Tallaght University Hospital and St James Hospitals. Patient referral pathways will be formed, similar to the very successful model currently in operation in Beaumont Lodge. These pathways have proved to be very successful in reducing length of stay in acute hospitals which increase capacity in Emergency Departments.
- Further details on the specialised dementia care unit – There is a nationwide lack of dementia specific units, Bartra have a proven track record of caring for this vulnerable group of patients. Staff in Bartra are specially trained to meet this specific care and adopt a person centred, social model as opposed to a medical model.
- The number of people using the mobile diagnostic facilities as outpatients – mobile diagnostics will prevent unnecessary referrals of patients to Emergency Departments improving their quality of care and reduces the demand on hospitals. It is anticipated that the local GPs may each refer approximately one patient per week from the centre once funding is approved by the HSE.

We trust the above response addresses the issue to the satisfaction of the Planning Authority.

Item 3

“Height and Density Justification / Alteration

The Applicant is proposing a 5-storey building, with a plot ratio of 1.78. The height and density of the development exceed the provisions of the Tallaght Town Centre Local Area Plan 2020. The Applicant is requested to submit a justification for the height and density of the development, with particular regard to the LAP and South Dublin County Development Plan 2022 – 2028 and Appendix 10 of the Development Plan. The Applicant should note that some flexibility can be applied to height and density of development where a case can be made for significant public or economic benefit. While a justification has been provided with the initial application, a revised justification is required on foot of issues raised in the planning assessment and additional information items. The Applicant should note that the Planning Authority may look more favourably on a development site in excess of 2ha, where significant public benefit can be achieved. In lieu of providing a sufficient justification for the height of the development, the Applicant should remove the fifth storey of the building, to comply with the height requirements of the LAP.”

Applicant Response:

In response to Item No. 3, the Applicant notes that the South Dublin County Development Plan strategy regarding building height is adopted from guidelines outlined in the National Planning Framework and Urban Development and Building Height Guidelines noting that building height should generally be increased subject to an assessment of building performance criteria.



Section 4.3 of Appendix 10 of the South Dublin County Development Plan 2022-2028 includes a 'Contextual Analysis Toolkit' prepared by South Dublin County Council in collaboration with O'Mahony Pike Architects and sets out several questions that Applicants seeking to increase building height and density proposals should consider when presenting their development to South Dublin County Council for consideration.

The height of the proposed Transitional Care Facility at 5 storeys exceeds the height envisaged for this area of parcel CT-C by 1 storey. The Tallaght Town Centre Local Area Plan 2020 outlines that a height of 3-4 storeys for commercial or residential development is suitable at this location. On this basis, the Applicant refers to the Contextual Analysis Toolkit as included in Appendix 10 of the South Dublin County Development Plan 2022-2028 to justify exceeding the envisaged height at this location by 1 no. storeys as follows:

- **Context**

- The subject site is well served by public transport links with high capacity, frequent service, and good links to other modes of public transport that link the site to the wider city. The site is located approximately 450 metres from the Belgard Road Luas Stop. It is noted that throughout the lifetime of the Tallaght Town Centre LAP 2020 this distance is set to decrease to c. 300 metres through the provision of a proposed tertiary route from the Cookstown regeneration area towards the Luas stop. Appendix 10 of the South Dublin County Development Plan 2022-2028 notes the following:

'Densities are expected to be higher the closer they are to LUAS and Bus Connects corridors and lower elsewhere'.

The proposed development site is also close to proposed Bus Connects upgrade routes through Tallaght Town Centre and to the south of the site and along Belgard Road to the east of the site which will facilitate increased public transport connectivity when delivered.

It is considered that the proposed development has adopted an urban intensification approach proportionate to its setting. The proposed development does not provide a landmark building but exceeds the LAP envisaged height at this location by 1 no. storey in keeping with the planned development of the east subject of a separate LRD Application which will include a secondary landscape feature building. The proposed Transitional Care Facility has been carefully designed to ensure that it does not have any adverse impact on surrounding existing development and that it will be able to successfully assimilate into its surroundings as other nearby sites in the Cookstown Regeneration Area are redeveloped. The proposed height of the building enables the development potential and functionality of the Transitional Care Facility to be maximised.

The proposed plot ratio of 1.78 exceeds the envisaged plot ratio range of 0.75-1.0 for land parcel CT-C as outlined in the Tallaght Town Centre LAP. This calculation has been based off a site area of 0.3784ha and does not include the area of public open space provided ancillary to the Transitional Care Facility in the form of a pocket park, in line with the layout for the site included in the LAP. The provision of this area of public open space presents significant planning gain and will be delivered in tandem with the delivery of the TCF facility, earmarking a significant step towards the redevelopment of the Cookstown Regeneration Area.

- **Setting**

- It is considered that the proposed development presents a positive contribution towards the receiving environment as it currently exists. The surrounding area is earmarked for regenerative redevelopment that will result in the creation of a new mixed use residential neighbourhood in place of the existing Cookstown Industrial Estate within the lifetime of the Tallaght Town Centre Local Area Plan.
- The proposal for a Transitional Care Facility at this location will provide an essential healthcare use close to Tallaght Hospital and offers cycle and pedestrian upgrades providing increased connectivity to the Belgard Luas Stop and towards Tallaght Town Centre.
- The surrounding context is characterised by low rise industrial and commercial units generally 1-3 storeys in height. It is envisaged that throughout the lifetime of the Tallaght Town Centre Local



Area Plan 2020 the sites surrounding the development site will be subject to regenerative development to provide a new mixed use residential neighbourhood at Cookstown. The regenerative development will include increased building heights in line with the Tallaght Town Centre Local Area Plan vision for Cookstown. This will include the provision of building heights of 3 to 6 no. storeys along 1st and 2nd Avenue.

- There are no surrounding heritage designations that should be considered when proposing increased building height on this site.
- The proposed development will make a positive contribution to its context by being one of the first regenerative developments at Cookstown. The proposal will kickstart South Dublin County Councils regeneration objectives for this area. The proposal includes for upgrades to pedestrian and cycle infrastructure towards the Belgard Road Luas Stop to the east of the site and Tallaght Town Centre to the south. The proposal does not rely on any speculative future routes or connections and provides direct pedestrian and cycle links towards key infrastructure in Tallaght as part of the proposal.

- **Connections**

- The proposal facilitates connections towards social infrastructure and provides as many connections to the wider urban area that is practicable as part of this application. The proposal provides pedestrian and cycle infrastructure upgrades connecting the site towards the Belgard Road Luas Stop to the east of the site and towards Tallaght Town Centre to the south.
- A one-way vehicular access road is provided through the development site. This has been carefully designed to discourage excessive speeds and car dominance throughout the development site. This arrangement also increases permeability through the site which currently has no vehicular throughway.
- The proposed development also provides for the provision of a section of a pocket park included within parcel CT-C in the Tallaght Town Centre Local Area Plan. This contributes towards the achievement of the provision of a 5,200 sq.m pocket park in the central area of land parcel CT-C as outlined in the Tallaght Town Centre LAP. The provided new pedestrian links through the site and pedestrian and cycle links connecting the site to the Belgard Road Luas Stop and Tallaght Town Centre will increase the accessibility of the provided section of the pocket park.

- **Inclusivity**

- The proposed development provides equitable, people friendly streets, spaces and uses through the provision of upgrades to pedestrian and cycle infrastructure towards the Belgard Road Luas Stop and Tallaght Town Centre. These infrastructural upgrades promote inclusivity offering improved connections usable by those of all levels of mobility connecting the site to public transport and social infrastructure. The provision of upgraded infrastructure connecting to the site will also allow for the provided section of pocket park to be easily accessed by pedestrians and cyclists travelling to the site from the wider Cookstown Industrial Estate and Belgard Road areas.
- It is submitted that while not publicly accessible, the ground floor of the proposed Transitional Care Facility fronting onto 1st Avenue and the internal access road through the development site have active frontage to be used by patients and staff of the transitional care facility.

- **Variety**

- The proposed height of 5 storey will complement the envisaged pattern of building heights for the Cookstown Regeneration Area, which generally will range between 3 no storeys and 10+ no. storeys across the regeneration area. Whilst the proposed building height of 5 no. storeys exceeds the envisaged height for this specific location of 4 no. storeys, consideration, must be given to the overall height strategy envisaged for the Cookstown area. In the context of the overall



regeneration of the Cookstown Area and the Applicant's future plans for a residential proposal on the eastern portion of the development site the building height is considered appropriate in its site-specific context.

- The proposed Transitional Care Facility facilitates and encourages a wider mix of uses across the overall development site. The proposed development on the western portion of the site is part of an overall development on the subject lands in the Applicant's landholding, subject to the lodgement of a separate application for residential development on the Applicant's landholding on the eastern portion of the overall site.

This element of the development will provide a healthcare use and contribute towards the overall development mix when a separate application for a mixed used development on the eastern portion of the site is lodged. This mix of healthcare and residential use on the site is complimentary to the site location close to Tallaght Hospital, Tallaght Town Centre, and transport links.

- **Efficiency**

- The proposed height of 5 storeys for this element of the overall development enables the optimal use of the land at a sustainable density. It is considered that optimal density is that which has a positive impact on the local community and the environment – sufficiently occupied to create a vibrant neighbourhood which supports the needs of the residents without being oversubscribed to the point where it comprises the liveability of the place. The proposed healthcare use is complimentary to the existing Tallaght Hospital to the south of the development site and will provide transitional care to patients discharged from hospital but still in need of longer-term support. The provision of a Transitional Care Facility will complement the proposed future use on the eastern portion of the Applicant's landholding, which will provide a mixed-use residential development subject to a separate planning application.

- **Distinctiveness**

- The proposed development will enhance the character of the surrounding area. Currently Cookstown is characterised by primarily light industrial and warehouse units and is zoned for regenerative development with a vision for the area to emerge as new mixed use residential neighbourhood within the lifetime of the Tallaght Town Centre Local Area Plan. The proposed development provides a bespoke Transitional Care Facility that has been designed to respond to the site and its constraints. The building will be a distinct 5 storey offering which will signify the start of the regeneration of the Cookstown Area.

- **Layout**

- The layout of the development site has been designed to accord with the envisaged layout for this land parcel CT-C as included within the Tallaght Town Centre Local Area Plan 2020. The proposed site layout provides building frontage along First Avenue, an internal one-way access road through the site and the delivery of a section of the envisaged pocket park for this land parcel CT-C as included within the Tallaght Town Centre Local Area Plan 2020.

- **Public Realm**

- The proposed Transitional Care Facility has been designed to provide passive surveillance to surrounding public realm areas. The proposed building overlooks the section of pocket park that is provided as part of this application, to the immediate south of the proposed TCF building. Pedestrian crossing points have been provided in appropriate locations and the road design through the site has been chosen to slow the speed of vehicular traffic through the site, creating a safer place for pedestrians.

- **Adaptability**

- It is submitted that the proposed development has been specifically designed as a Transitional Care Facility Unit and therefore it is not considered that the building use will change in the near future. However, internal spaces are flexibly designed to facilitate room amalgamations/reconfigurations, as required in the future.



- The proposed building has been designed to facilitate a future connection to South Dublin County Councils HeatNet District Heating System, should SDCC expand the scheme into this area of Cookstown in the future.
- **Privacy and Amenity**
 - It is submitted that the proposed Transitional Care Facility does not result in the loss of amenity of any surrounding existing or planned projects. The design has been carefully considered to respond to the site and its constraints and allow for the facilitation of the redevelopment of other surrounding sites within the Cookstown Regeneration Area in the future, following the general layout of the block plan envisaged for this land parcel CT-C as included in the Tallaght Town Centre Local Area Plan 2020.
 - The communal open space area for the Transitional Care Facility has been designed as an internalised landscaped courtyard offering maximum privacy and safety for Transitional Care Facility users.
- **Parking**
 - An appropriate level of parking has been provided for the Transitional Care Facility to cater for the needs of staff, visitors and set down deliveries/ emergency vehicle drop off whilst still maintaining pedestrian priority throughout the development site. A single, one way vehicular through road is proposed traversing the development site, with pedestrian areas separated from this area by a verge and planting. The road through the site has been designed to minimise vehicular speeds through the site. Adequate crossing points are provided within the development site boundary, allowing safe pedestrian travel through the site when crossing the vehicular roadway.

Having considered all the above principles outlined in section 4.3 – Contextual Analysis Toolkit included in Appendix 10 of the South Dublin County Development plan and referring to the envisaged regeneration objectives for this site located in land parcel CT-C included within the Tallaght Town Centre Local Area Plan 2020, it is considered that, following a criteria-based assessment, this site is suitable for the increased Transitional Care Facility height of 5 no. storeys, 1 no. storey above what is envisioned for this site within the Tallaght Town Centre Local Area Plan 2020.

We also refer the Planning Authority to section 10.2.3 of Planning Report prepared by Brock McClure Planning and Development Consultants submitted with the original planning pack which includes the following rationale for the increased plot ratio provided at this location:

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

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

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

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

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

“Flexibility in relation to the gross floor area of up to 20% of the plot ratio ranges may generally be applicable where there is a strong design rationale for an increase in density/height and the development will result in a significant public gain.”

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

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

We draw the Planning Authority’s attention the Board’s assessment of the previous application Ref. SD21A/ / ABP Ref. ABP-311568-21 which stated the following in relation to plot ratio and height:

“Improvements to the public realm immediately adjoining the site would be made by providing a 4m footpath which could accommodate a cycle lane. However, even though large sections of the public road are included in the red line for the development, the proposal does not provide major upgrades to the existing streets or allow for enhanced junctions or crossing points which are lacking in the existing public realm.”

In response to this item, we note that the connection upgrade works to the Town Centre and Luas are considered major upgrade works and make a significant contribution the public realm around the site, therefore justifying increased height and plot ratio at this location.

The Inspector goes onto state:

“I am satisfied that the development proposal can be considered for additional height and plot ratio based on the criteria set out in Section 2.6 of the LAP. The site is in within 500m of existing high-capacity public transport and within 100m of the proposed new urban square. It is also located on the corner of First Avenue and Cookstown Estate Road which would become a four-way intersection in the new road network for the area. In addition, the development would help to achieve the LAP objective to provide a new pocket park by providing a portion of this park within their site with a view towards integrating with the adjoining sites when they become available for development .”

“In terms of the criteria set out in Section 3 of the Building Height Guidelines, I consider the location of the site to be capable of accommodating increased density and height as per the Building Height Guidelines given the location of the site within an urban area in close proximity to high quality public transport.” (Own emphasis)

It is considered that a robust justification has been made to facilitate the additional 4th floor (5th storey) as part of this response.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 4

“Car parking and set down areas

The Applicant is proposing to remove a significant amount of existing green infrastructure around the immediate site boundaries, including trees and grass verges. The Planning Authority does not support the removal of such an excess of green infrastructure, in particular the removal of the grass verge to provide set down and drop off bays serving the development, outside the ownership boundary of the Applicant, and without a suitable replacement/mitigation plan. The use of parts of South Dublin County Council lands on First Avenue and Cookstown Road for set down and drop off bays would undermine the future delivery of a quality public realm in this part of Cookstown, and there would be a concern about how these bays would be used in the interim while Cookstown functions as an industrial estate, with HGV traffic. Any parking and set-down areas connected with the proposals should be provided within the landholding and should not rely on the lands outside the control of the Applicant.”

Applicant Response:

In response to Item No. 4, we note the existing condition of the public realm consists of grass verges devoid of any mixed species, concrete hard standing pavements and high railings separating the public areas from the existing commercial site, as depicted in Figure 4 below.

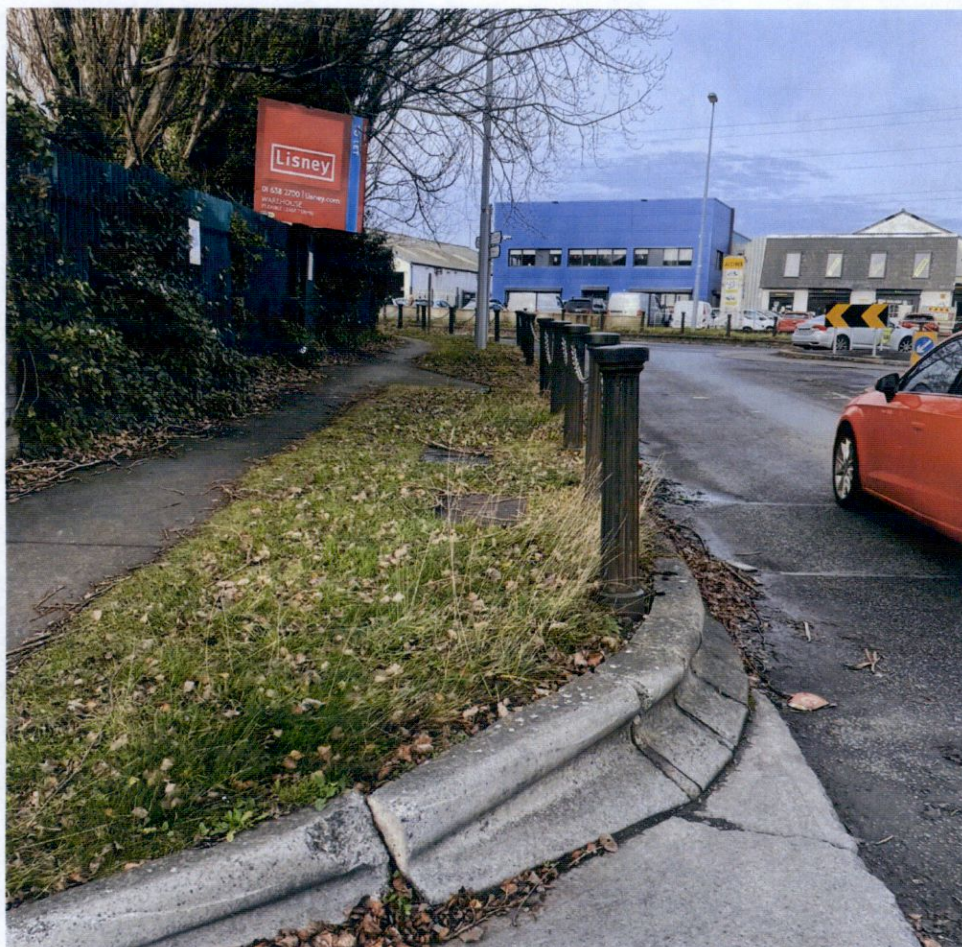


Figure 4 – Existing Condition of Public Realm (east of the site on Cookstown Road)

The existing grass verge along Cookstown Road is of poor quality and contains a single, small to medium sized birch tree. This verge is sat behind high containment kerbs, the replacement of which will be necessary to achieve an accessible DMURS compliant streetscape. Replacing this verge is therefore a key piece of infrastructural work that must be carried out to realise the objectives of the Tallaght Town Centre Local Area Plan. Concerns regarding the loss of green infrastructure have been noted and the public realm proposals now depict a reduced quantum of set down and parking spaces while delivering a comfortable pedestrian and cycle environment.



The proposed public realm improvements will consist of planted verges, parking bays, bicycle stands, tree stands and new public lighting fixtures.

These revised proposals create a new roadside verge containing bicycle parking to serve future commercial units along Cookstown Road and delivers a line of street trees to mitigate the loss of the existing grass verge and birch trees, as depicted in Figure 5 below.

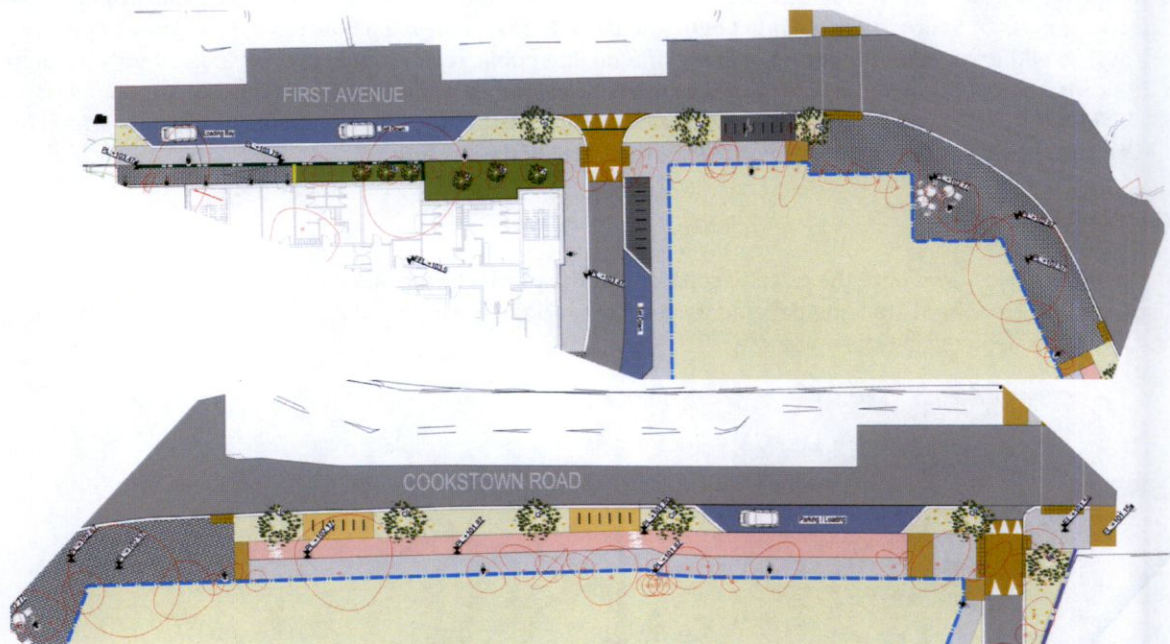


Figure 5– Proposed Public Realm Improvements to First Avenue and Cookstown Road

We would like to take this opportunity to clarify that all set-down spaces are located within the Applicant’s landholding. The Applicant owns to the centre point of the public roads at First Avenue and Cookstown Road as illustrated in Drawing No. 3514-EML-ZZ-08-DR-A-0011 prepared by EML Architects.

Some key changes to the public realm arising from this response include the following:

- Reduced length of the loading bay/set-down area north of the transitional care facility resulting in an enlarged planted verge.
- Removal of one of the loading/parking bays to Cookstown Road and replacement with planted verge.
- Relocated bicycle stands to the north of the site.
- Enlarged shared surface to the north east of the site at the junction of First Avenue and Cookstown Road.
- Relocated set-down area along the internal road to the south of the future development (residential Block B) and replacement with planted verge.

We refer to the Arboricultural Assessment and Impact Report submitted originally with the application and note the poor quality of the poplar trees that line the site perimeter.

The site was surveyed by qualified Ciaran Keating of CML Hort & Arb Ltd. The submitted report concluded that whilst the loss of trees will be significant in terms of numbers and impact to the streetscape in this area, it is considered that the removal of all trees on site will be inevitable in the short to medium term and therefore it is considered that the loss of trees due to the proposed development should be viewed in relation to the context of the site and its associated regeneration objectives, as outlined in the Tallaght LAP.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 5



“Car and Bicycle Parking

The Applicant has stated 17 no. car parking spaces would be provided to serve the facility, with 26 no. bicycle parking spaces. It is not considered that sufficient detail in relation to likely traffic movements and visitor requirements has been provided. In addition, the impact of the future residential development and the additional demands on parking at the site are not considered to have been fully considered. The Applicant is requested to submit revised information addressing these concerns and updating the layout and parking proposals as necessary. The Applicant shall submit a revised layout of not less than 1:200 scale showing the location and number of parking spaces to be provided for staff, residents and visitors at the care facility. Please refer to Table 12.25: Maximum Parking Rates (Non- Residential) – from the SDCC County Development Plan 2022-2028. In addressing these concerns, the Applicant should ensure that the developable site area accommodates all the requirements of the site in terms of parking and visitor drop off areas.”

Applicant Response:

In response to Item No. 5, there are expected to be up to 130 no. staff employed at the Transitional Care Facility broken into 3 no. shift periods across the day including night shifts. Organised visiting will be permitted at the facility.

The primary operational use of the Transitional Care Facility is for when persons are discharged from a hospital facility but need continued rehabilitation to aid with their recovery. It is predicted that the average duration of stay for a person using the Transitional Care Facility will be circa 30 days. Beds will also be allocated for those requiring a longer term stay at the facility. Patients will travel to the facility via car or ambulance.

Staff are expected to use sustainable means of travel to access the facility given its proximity to the Belgard Road Luas Stop and Tallaght Town Centre and surrounding residential areas in Tallaght.

Based on the durations of stay outlined this will equate to 103 no. bedspaces generating approximately 2 patient trips per month (1 no. arrival and 1 no. departure) and the remaining 28 no. bedspaces generating a similar level of trips but over a period of years. Patients are not expected to generate any long term parking requirements.

Visiting will occur in a manner very similar to a traditional nursing home, taking place in evenings and at weekends and not coinciding with peak traffic periods.

Taking the above into consideration, the transportation characteristics of the proposed TCF relative to a traditional nursing home are considered negligible. On that basis, the parking requirements associated with the TCF are deemed comparable to that of a nursing home and the relevant standards from Table 12.25 of the Development Plan are applicable. This is in line with the following statement from Section 12.7.4 of the Development Plan:

“For any commercial use not specified within Table 12.25 the default parking rate will be calculated based on those of a comparable use and / or determined as part of a Transport and Traffic Assessment.”

The development site is located in Zone 2 given its proximity to the nearby Luas Red Line stop which has an associated rate as follows:

- 1 no. car parking space per 8 residents;
- 1 no. cycle parking space per 5 staff (long term);
- 1 no. cycle parking space per 10 residents (short stay).

Based on 131 no. bedspaces in the TCF, this equates to an allowance for 17 no. car spaces. Allowing for a conservative maximum on-site population at one time of 65 no. staff and a peak 131 no. patients, this equates to a cycle parking requirement of 26 no. cycle spaces. All spaces referenced are contained within the site layout and away from the public road. Please refer to the architectural layouts submitted under separate cover indicating the location of all parking spaces proposed.

The Development Plan does not include specific requirement to divide the usage of spaces proposed. As noted, patients will not have a long term parking requirement meaning the provided spaces will be used for staff and visitors. It is expected that the spaces will be split relatively evenly between these parties, with staff parking prioritised for those working anti-social hours and long shift times. Some flexibility is considered beneficial to allow



for dual usage of spaces between staff and visitors, particularly for night shifts which don't coincide with peak traffic periods and where there is no visiting demand.

We refer to OCSC's report and cover letter accompanying this response for more information.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 6

“Interim plans for residential area of the site

The Applicant indicates on plans the area to the east within the site boundary will be proposed as residential development. The delivery of this residential development cannot be guaranteed and in the interim the Applicant is requested to provide details about landscaping proposals for this section of the site, to cater for a situation whereby the transitional care facility is operational, but the residential development is not forthcoming.”

Applicant Response:

In response to Item No. 6, demolition of the existing commercial structures will be undertaken as part of this permission, the area will be grassed and fenced until such time that permission is granted for the proposed residential development (subject of a future LRD application to SDCC).

We refer the Planning Authority to the Site Plan prepared by EML Architects drawing no. 3514-EML-ZZ-08-DR-A-0011 which shows the area on the site subject to a future apartment development and Landscape drawing no. 21SD01-DR-300 which shows the treatment for this future apartment development area in the interim, which will be a fenced with a mown lawn area. We invite a suitably worded condition relating to the maintenance of this space, until construction commences on the proposed mixed-use development.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 7

“Previous reasons for refusal

The site layout does not address previous reasons for refusal relating to the dominance of surface car parking, and there is a concern about the location of car parking along the southern boundary of the site, potentially impacting the development potential of the site to the south, and the delivery of a tertiary route at this location. The Applicant is requested to address these concerns with a revised layout, minimising the impact of surface level car parking and protecting the tertiary route through the development.”

Applicant Response:

In response to Item No. 7, we refer the Planning Authority to the FI Response note prepared by OCSC Engineers which notes the following in response to RFI Item 7:

The proposed development provides extensive interim upgrade works pedestrian and cyclist infrastructure surrounding the development site towards both the Belgard Road Luas Stop and Tallaght Town Centre. This addresses An Bord Pleanála's previous reason for refusal relating to the the lack of specific pedestrian crossing upgrades included as part of the works in the previous application. We note that these upgrades have been included and will facilitate safe pedestrian and cyclist movement to and from the development site.

Proposals for off road cycle infrastructure along the development boundary with Cookstown Estate Road have been further refined as shown in the revised road layout submitted with this response. This provides a clear design for these facilities and includes segregated spaces in accordance with the Design Manual for Urban Roads and Streets (DMURS) and the National Cycle Manual (NCM) which transition to a shared space facility in the northern corner to provide flexibility in the use of public realm space.



With respect to the dominance of car parking, the refused development proposed a total of 42 no. surface car parking spaces which has been significantly reduced by 24% to 32 no. spaces. The design of on-street parking is in accordance with the guidance set out in DMURS Section 4.4.9 through the following design features:

- Reduced parking rates where densities are high;
- Perpendicular spaces proposed on the internal local street where vehicles volumes and speeds will be low;
- Bays of parking spaces limited to 6 perpendicular spaces with landscaping features provided between them;
- Perpendicular parking limited to on-side of the street in each location provided to avoid dominating the streetscape.

The development potential of the site to the south is not considered to be materially impacted by the proposed layout. This site enjoys frontage onto Cookstown Estate Road and Second Avenue which are considered far more appropriate in terms of facilitating access to this site and any access via a road along its northern boundary with the development site would be far more circuitous and inefficient, unnecessarily increasing vehicles movements on local access roads.

Please see EML architects drawing 3514-EML-ZZ-ZZ-DR-A-0020 included which overlays the proposed development on local area plans maps, to be read in conjunction with reports from OCSC Consulting Engineers and Áit U+L. As the overlay shows, the development aligns with the local area plan intent and will not impact the development potential of adjacent sites and provides for the tertiary route to the south that the planning authority refers to.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 8

“Pedestrian, Cyclist and Public Realm Upgrades

The Planning Authority is in the process of putting together a design study to assess the link along First Avenue to Belgard Luas, and along Belgard Road. This study will be looking at active travel, public realm, planting, SUDS and drainage as well as the management of HGV movement in advance of preparing a strategy for the area. The Applicant is proposing interim measures to serve the development. The Planning Authority is concerned about the appropriateness of these interim measures for a development of this type and scale at this location. The Applicant is therefore requested to progress road design proposals for the public road bounding the site and between the site and the Belgard Luas. The Applicant should submit a revised layout of not less than 1:200 scale, showing Cycle/Pedestrian link upgrades designed to the standards set out in DMURS, and The National Cycle Manual, and meeting more general public realm aspirations set out in the LAP. These proposals must align with the outcome of the design study to ensure that all works are consistent and do not affect the future upgrade potential of First Avenue. In advance of the design study being complete, the Planning Authority has concerns that the works may be premature pending the outcome of the study and implementation of upgraded infrastructure. The identification of physical infrastructure requirements of the CTC sub-neighbourhood for its development and the more generalised phasing requirements set out in the Local Area Plan are relevant in this regard.”

Applicant Response:

In response to Item No. 8, the Applicant has given consideration and assessed the viability of providing a full upgrade to a section of the Cookstown Estate Road to the Belgard Luas Stop as part of this Further Information Response. The following constraints to the delivery of this full upgrade were identified by the Applicant as follows:

- The design of any full upgrade works would need to be cognisant with the wider LAP vision of development in the surrounding area which will ultimately see all sites bordering the development site developed in the future, changing the nature of the surrounding environment significantly. As the details of surrounding future developments are unknown, the design proposals as set out in this application and Further Information Response are mindful to not to negatively impact development potential of other sites locally in any way.
- Any proposed upgrade works must also maintain access to the existing developments along the link road which are currently still in operation.



- The South Dublin Active Travel Plan when final will propose extensive upgrade works in the South Dublin area to cycle infrastructure. Included in the Active Travel maps published on the SDCC website is a scheme to upgrade cycle links from Tallaght to Clondalkin which is expected to include the pedestrian and cycle links included as part of this application within its remit.
- It is considered that the cost of a full cross-sectional upgrade along 1st Avenue towards the Belgard Road Luas Stop would present a disproportionate cost in relation to the scale of the proposed development and would therefore render any development on the subject site unviable.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 9

“Road Safety Audit

The Applicant is requested to submit a Road Safety Audit.”

Applicant Response:

In response to Item No. 9, we submit that a Road Safety Audit has been carried out by an independent consultant Traffico. The proposed design has been amended accordingly having regard to the relatively minor issues highlighted by the audit team, including provision of the following:

1. Appropriate footpath gradients at access points and pedestrian crossings;
2. Universal access between loading bay and adjacent footpath;
3. Facilitate pedestrian crossings;
4. Appropriate mitigation measures to prevent vehicles rolling over shared surface;
5. Improved visibility for cyclists;
6. Appropriate cycle track termination; and
7. Rationalised street furniture.

Please refer to the completed Road Safety Audit Report by Traffico and Feedback Form submitted with this response and the following revised OCSC Drawings:

B981-OCSC-XX-XX-DR-C-0111 (Proposed Road Layout Sheet 1 of 6);
B981-OCSC-XX-XX-DR-C-0112 (Proposed Road Layout Sheet 2 of 6);
B981-OCSC-XX-XX-DR-C-0113 (Proposed Road Layout Sheet 3 of 6);
B981-OCSC-XX-XX-DR-C-0114 (Proposed Road Layout Sheet 4 of 6);
B981-OCSC-XX-XX-DR-C-0115 (Proposed Road Layout Sheet 5 of 6);
B981-OCSC-XX-XX-DR-C-0116 (Proposed Road Layout Sheet 6 of 6).

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 10

“Internal Road Layout.

The Applicant is requested to submit:

- a. **a layout of not less than 1:200 scale showing a revised internal road layout with a two-way system along with a vehicular link road running along the Northern boundary of the Park.**
- b. **a layout of not less than 1:200 scale showing a Pedestrian Crossing with tactile paving and dropped kerb located between southern internal footpath and the Pocket Park.”**

Applicant Response:

In response to Item No. 10a, the single carriageway has been designed in accordance with best practice and compliance with DMURS. The overall layout and circulation routes reduce car dominance, promote traffic safety

and prioritise pedestrian and cyclist activity. As such, car parking is limited and restricted to a single carriageway through the site.

We refer to OCSC's cover letter for more information.

In response to Item No. 10b, we refer to Drawing No. B981-OCSC-XX-XX-DR- C-0111 (Proposed Road Layout) prepared by OCSC. The pedestrian route leading from Cookstown Road across the internal road to the pocket park will comprise a footpath south of Block B (proposed under separate LRD proposal) crossing the internal road via a level crossing and continuing through the pocket park.

The proposed one way vehicular route through the site has been incorporated to reduce the dominance of road space through the development site and minimise unnecessary vehicular movements through the site, giving priority to pedestrians. Providing a 2 way road through the site would have a detrimental impact on the development layout and reduce space available for landscaping and safe pedestrian areas, whilst also reducing the area available for buildings on the site which would lead to necessary reductions in scale, efficiencies and viability of the development. There is no tangible and obvious benefit to the provision of a two-way road. With respect to the accessibility of the public park, it is noted that the section in the southeast corner of the development is just one portion of an overall park to be development in conjunction with the adjacent sites. This will provide multiples access routes to the park area facilitating access from all directions.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 11

“Public Lighting

Clarity is required regarding which public realm areas are to publicly maintained. An agreed TIC drawings is required.

a. The 'Site Lighting Design' drawing layout does not agree with the cycleway layout proposed in the Road Layout Drawings 1-6.

b. If the Road Layout Drawings are correct, the existing street lighting along First Avenue and Cookstown Road will need to be fully re-designed. This has not been included for in the current submission. The Landscape drawings show street trees and parking areas where the road layout drawings show cycleways. The landscape drawing should be revised and should included the revised street lighting plan to ensure co-ordination between lamp posts and street trees.”

Applicant Response:

In response to Item No. 11, we refer to the Taken in Charge Drawing No. 3514-EML-ZZ-ZZ-DR-A-0009 and Ownership Map Drawing No. 3514-EML-ZZ-08-DR-A-0011 prepared by EML Architects. The drawings indicate that the Applicant owns to the centre point of First Avenue to the north and Cookstown Road to the east. The proposed public realm areas are currently owned by the Applicant.

It is envisaged that the on-street parking and delivery bays to First Avenue and Cookstown Road will be taken in charge by South Dublin County Council, subject to agreement, post-planning.

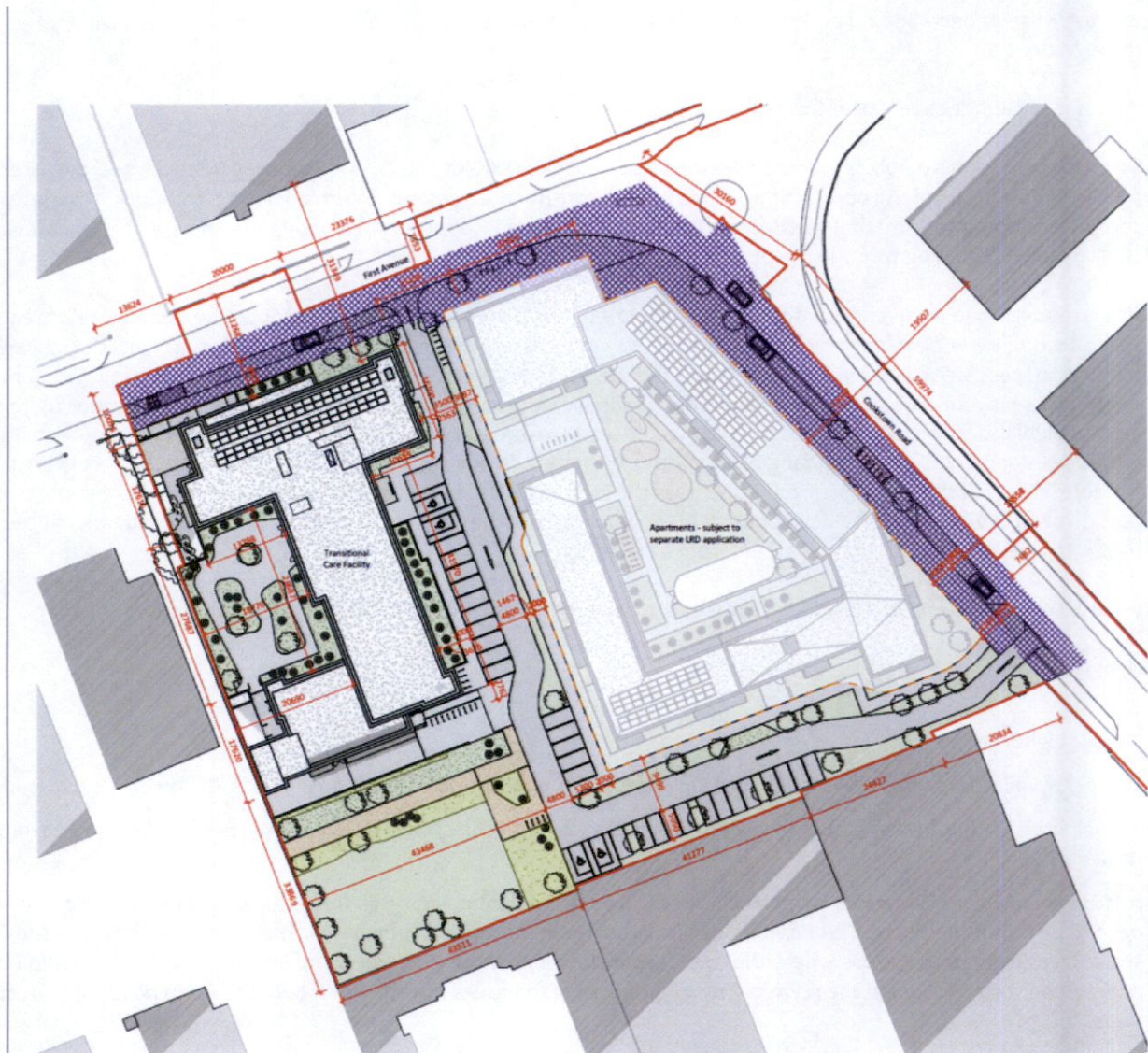


Figure 6 – Proposed Taking in Charge (hatched purple)

In response to Item No. 11a, we confirm the cycleway as shown on the Site Lighting Design Drawing No. 4046-JVT-00-SI-DR-E-6006 prepared by J.V. Tierney conforms with the cycleway shown on the following Road Layout Drawings prepared by OCSC:

- B981-OCSC-XX-XX-DR-C-0111 (Proposed Road Layout Sheet 1 of 6);
- B981-OCSC-XX-XX-DR-C-0112 (Proposed Road Layout Sheet 2 of 6);
- B981-OCSC-XX-XX-DR-C-0113 (Proposed Road Layout Sheet 3 of 6);
- B981-OCSC-XX-XX-DR-C-0114 (Proposed Road Layout Sheet 4 of 6);
- B981-OCSC-XX-XX-DR-C-0115 (Proposed Road Layout Sheet 5 of 6);
- B981-OCSC-XX-XX-DR-C-0116 (Proposed Road Layout Sheet 6 of 6)

In response to Item No. 11b, the street lighting arrangement has been regularised as shown on Drawing No. 4046-JVT-00-SI-DR-E-6006 prepared by J.V. Tierney.

All street trees, parking bays and lamp posts have been regularised across all landscape, lighting and road layout drawings. We refer to the Further Information drawing packs prepared by OCSC, JV Tierney and Áit Landscape and Urbanism for more information.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 12

“Landscape Design Proposals

It is not considered that sufficient information has been received in relation to the design of the pocket park. Page 50 of the LAP sets out specific Open Space requirements for the development of the CTC Sub-Neighbourhood. As such this matter is considered as part of the phasing requirements for the LAP. The Applicant is requested to provide a masterplan for the entire pocket park that is partly located within the subject site. The masterplan should be designed to show how the pocket park would function as a whole and provide amenity for this sub-neighbourhood and how the section located within the landholding would function as a standalone area of open space that could be integrated later on into the wider pocket park. The Applicant is again encouraged to consider additional opportunities for site assembly, with a view to exceeding 2ha and thereby providing greater opportunity to provide additional, in line with Chapter 8 ‘Implementation and Sequencing’ of the LAP, which allows for contravention of the phasing of the Plan, on sites of 2ha or more where a barrier to development is involved. In providing the information, the Applicant shall:

- a. Provide a fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council’s Public Realm Section. The Applicant shall provide the following additional information:
 - i. Submit a comprehensive Landscape Design Rationale, the objective of this report is to describe the proposed landscape and external works as part of this proposed housing development.
 - ii. Submit a fully detailed Planting Plan to accompany the landscape proposals for the entire development. The Applicant should propose native species where possible to encourage biodiversity and support pollinators within the landscape.
 - iii. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDS features including swales and integrated/bio-retention tree pits.
 - iv. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site.
 - v. Demonstrate how natural SUDS features can be incorporated into the design of the proposed Development
 - vi. Submit green infrastructure proposals and a green infrastructure plan that will mitigate and compensate for the impact of the proposed development on this existing site and show connections to the wider GI Network. These proposals should include additional landscaping, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the local Bat population.
 - vii. Proposed Pocket Park – The Applicant is required to provide detailed information as to how the pocket park provided for within the Tallaght Town Centre Local Area Plan will be delivered as part of this development or in conjunction with other proposed development in the area. A masterplan is required for this proposed Pocket Park and a detailed schedule set out for its proposed delivery.
 - viii. Green Infrastructure: The Applicant is requested to submit a Green Infrastructure Plan which shall be submitted as part of the suite of Landscape Plans that are required for a development.

The Green infrastructure Plans should include the following information:

 - a) Site location plan showing the development site in the context of the wider GI as shown on the Council’s GI Plan for the County.
 - b) Site survey and analysis, identifying existing GI Infrastructure and key assets within the site.
 - c) Indicate how the development proposals link to and enhance the wider GI Network of the County.
 - d) Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site.
 - e) Proposals for identification and control of invasive species where appropriate, for the site
 - ix. Provide play and recreation opportunities for children and teenagers as appropriate to the scale and character of proposed development. Proposals shall be submitted in the form of a Proposed Play Rationale and Layout Plan (separate to, but related to the Landscape Masterplan), using Nature-based Solutions. The Layout Plan shall comprise the following:

- *showing types of play and play area(s),*
- *target age groups,*
- *landform (included levels and contours) and boundaries,*
- *gates and planting,*
- *design and construction details of play opportunities and facilities in respect of landform, planting, boundaries, equipment and safety surface.*
- *All play equipment and ancillaries shall conform to European Standards EN 1176 and EN 1177. Playground equipment and surfacing, and to BS/EN standards 2017/18 for Playground Installations for HIC (Head Injury Criterion) and CFH (Critical Fall Height)."*

Applicant Response:

In response to Item No. 12, we refer the Planning Authority to Drawing No. 21SD01-DR-301. prepared by Áit Landscape and Urbanism which details the overall pocket park and landscape masterplan for the subject site and adjoining site as set out in the Tallaght LAP for Cookstown Area – CTC. We note from the outset that this plan was originally submitted with the Planning Application on Page 6 of the Landscape Design Report.

Site assembly is not possible given the separate ownership of adjoining sites by third parties.

In response to Item No. 12a(i), The accompanying Landscape Report prepared by Áit Landscape and Urbanism presents a Design Rationale for the development's landscape proposals. Please see Section 03 Landscape Design Proposals & Rationale in the resubmitted Landscape Report.

In response to Item No. 12a(ii), The submitted landscape plans and Landscape Report prepared by Áit Landscape and Urbanism contain details of the developments proposed planting. The planting proposals contain a wide range of native and non-native planting to encourage biodiversity and support pollinators. Please see landscape plan drawings 21SD01 DR-300 & DR-301 & Section 06 Proposed Planting Schedule of the resubmitted Landscape Report for details.

In response to Item No. 12a(iii), The resubmitted landscape plans and Landscape Report prepared by Áit Landscape and Urbanism provide details of both hard and soft landscape proposals. The submission also provides landscape sections detailing proposed landscape levels. In relation to SuDS features, the landscape design has been developed and coordinated with the Consulting Engineer's drainage design. Street tree pits will have a SuDS function with stormwater directed from road gullies to infiltrate to sub soil. In addition, swale/ rain gardens have been positioned to capture surface run off from adjacent paved surfaces in the Transitional Care Facility. In addition, the Transitional Care Facility has been designed with a sedum Green Roof. Please see accompanying landscape plan drawings 21SD01 DR-300. Also refer to OCSC Drawing B981- OCSC-XX-XXDR-C -0505 for further details of the updated surface water drainage design SuDS and stormwater tree pit detail can be seen in Consulting Engineer's OCSC Drawing B981- OCSC-XX-XX-DR-C-0535.

In response to Item No. 12a(iv), The landscape proposals for the development site are designed to provide amenity for patients and public users of the external spaces. The greening measures proposed improve on the existing site condition, providing new street and open space tree and hedge planting, meadow/ amenity lawn and planting of native and non-native planting to encourage biodiversity and support pollinators. The proposals are designed to mitigate against the loss of the existing trees and minimal planting on site. On Cookstown Road, a clear net gain is seen with a new grass verge with 5no. street trees (*Corylus colurna*) replacing the single existing birch tree. The POS space will contain large, long-lived specimens such as Oak & Scots Pine (beneficial to Bat populations), with small to medium sized tree planting of Birch, Wild Cherry and Field Maple.

In response to Item No. 12a(v), As per response (iii), landscape design has been developed and coordinated with the Consulting Engineer's drainage design to incorporate natural SuDS in the development.

In response to Item No. 12a(vi), The resubmitted landscape plans and report prepared by Áit Landscape and Urbanism detail a variety of green infrastructural proposals, including from a Green Roof on the Transitional Care

Facility building, planting of native and non- native planting to encourage biodiversity and support pollinators. Installation of new tree planting with open spaces and on street – with tree pits having a SuDS function to deal with stormwater at source. Green walls are provided within the Transitional Care Facility courtyard and on the building's south façade. The revised Landscape Report now contains a Green Infrastructure Section (Section 2.0), detailing the site's connection to the local LAP GI Network and showing the sites location in the context of the wider county Green Infrastructure Strategy Map.

In response to Item No. 12a(vii), s above, being cognisant of the requirement for a Neighbourhood Pocket Park to form part of the CT-C Sub-Neighbourhood contained within the Tallaght Town Centre LAP, the site planning for the development for the Cookstown Site has set out its Public Open Space (POS) to deliver a section of the Neighbourhood Pocket Park – approximately 1200 square metres. To demonstrate how the proposed development site's POS will form part of the wider Pocket Park, an indicative layout for the Pocket Park and surrounding development blocks was submitted as part of the original Transitional Care Facility application. An approach that was considered 'reasonable' by the An Bord Pleanála Inspector, as part of the previous Cookstown Site application (ABP-311568-21). The indicative layout demonstrates how the subject site POS can stand alone as part of this application and in time integrate with the wider Pocket Park. For further details please see 21SD01 DR-301 & the accompanying Landscape Report for details.

Having regard to the delivery of the subject sites POS, the park will be delivered in line with the delivery of the Transitional Care Facility and associated site infrastructure. In response to the request for a schedule for delivery of the Neighbourhood Pocket Park, no such undertaking can be given by the Applicant. The lands where the remaining area of the Neighbourhood Pocket Park lie are outside of the Applicant's ownership, do not form part of this current application and as such no schedule for a proposed delivery is possible.

In response to Item No. 12a(viii), The resubmitted Landscape Report now contains a Green Infrastructure Section (Section 2.0), detailing the site's connection to the local LAP GI Network and showing the sites location in the context of the wider county Green Infrastructure Strategy Map.

- a) The Green Infrastructure Section of the Landscape Report provides a Site Location Plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County. Please see accompanying Landscape Report, Section 2.0, for details.
- b) The resubmitted landscape report contains site survey/ analysis and identifies existing GI on site. Please see accompanying Landscape Report, Sections 1.0 & 2.0, for details.
- c) The Green Infrastructure Section of the Landscape Report contains diagrams and mapping indicating how the development site will link to and enhance the wider GI Network of the County. Please see accompanying Landscape Report, Section 2.0, for details.
- d) As outlined above the landscape proposals for the site aim to improve on the existing site condition in terms of GI. Please see accompanying Landscape Report & Landscape Plan 21SD01 DR-300 for details.
- e) Please refer to Consulting Ecologists Enviroguide's reports for details on control & identification of Invasive Species.

In response to Item No. 12a(ix), The resubmitted Landscape Report contains a Play Spaces diagram and Play rationale for the development site with target age groups shown. In addition, site section B-B cuts through the POS and its play space, detailing landform and levels. All play equipment and safety surfacing to comply with relevant BS/EN standards. Please see accompanying Landscape Report Section 3.0 Landscape Design Proposals & Rationale and 21SD01-DR-340 for details.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 13

"Sustainable Urban Drainage Systems

The Applicant is requested to submit the following in terms of SuDS:

- **A drawing to show how surface water shall be attenuated to greenfield run off rates.**
- **Submit a drawing to show what SuDS (Sustainable Drainage Systems) are proposed. Examples of SuDS include permeable paving, filter drain, bio-retention tree pits, rains gardens, swales or other such SuDS.**
- **SUDS Management - The Applicant is requested to submit a comprehensive SUDS Management Plan to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan should also be included as a demonstration of how the system will function following implementation.**
- **Additional natural SUDS features should be incorporated into the proposed drainage system for the development such as bio-retention/constructed tree pits, permeable paving, green roofs, filtration planting, filter strip etc. In addition, the Applicant should provide the following:**
 - a. **Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.**
 - b. **Tree pits incorporating SUDS features should include a deep cellular water storage/attenuation area below the surface which acts as a soak away allowing surface water to infiltrate into the ground**
 - c. **It is unclear how much attenuation in total is provided by the proposed bioretention tree pits for the development. The Applicant shall submit a report and drawing showing how much surface water attenuation in m³ is provided for the development.**
 - d. **The Applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022' for acceptable SUDS tree pit details.**
 - e. **Underground attenuation tanks are only permitted in exceptional circumstances and where all other natural SUDS measures have been utilised. If all other methods have been utilised and it is demonstrated that underground attenuation is required, it cannot be proposed under public open space areas and such areas will not be taken in charge by Public Realm. SUDS measures are only accepted as an element of public opens space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and biodiversity function."**

Applicant Response:

In response to Item No. 13, extensive SuDS measures were incorporated into the submitted drainage design. However, in line with the requests set out in this FI Item, additional measures have been incorporated. SuDS measures now incorporated include:

- Green roofs;
- Tree pits throughout the site;
- Swales;
- Rain gardens;
- Pervious paving.

The revised design is considered to have maximised the provision of SuDS measures when considering the constrained, brownfield nature of the site with limited green space and the desire to avoid attenuation measure in public open space areas, particularly those to be taken in charge by SDCC.

Please refer to the updated Engineering Services Report submitted as part of this application which includes all of the detail referenced including the SuDS Management Plan details. Also refer to OCSC Drawing B981-OCSC-XX-XX-DR-C-0505 for further details of the updated surface water drainage design incorporating the requested items. An updated tree pit detail can be seen in OCSC Drawing B981-OCSC-XX-XX-DR-C-0535.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 14

"Bat Survey

The Applicant is requested to submit a bat survey for bat usage carried out across the entire site and immediately adjoining sites to assess roosting and feeding/foraging activities and assessing potential impact on these species

arising from the proposed development. This is to be undertaken by a qualified and experienced bat expert at the appropriate time of the year for the survey of species.”

Applicant Response:

In response to Item No. 14, we refer to the Bat Activity Survey Report prepared by Enviroguide submitted as part of this Further Information Response Pack.

The report concludes that bat activity on the site was relatively low and associated with treelines on the site. No confirmed roosts were recorded, and treelines are classed as having low to negligible roost potential. Treelines on site act as foraging and commuting habitat for local bats in low numbers.

Appropriate measures have been recommended to ensure that the removal of the trees on site will not significantly affect local bat populations. In addition, several measures have also been outlined to minimise the impact of Operational Phase lighting on bats. Please refer to the submitted Bat Activity Survey Report for details.

Once these mitigations measures are implemented in full, the impacts on local bat populations as a result of the Proposed Development are not considered to be significant.

We note that an EIAR Screening statement has been prepared and accompanies this response. The report concludes that by reason of the nature, scale and location of the subject site, the Proposed Development will not be likely to have significant effects on the environment. Therefore, a mandatory Environmental Impact Assessment Report (EIAR) is not required for the Proposed Development.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 15

“Invasive Species Report

The Applicant is requested to submit a detailed survey for the presence of invasive species within the subject site (as listed on the third schedule of the European Communities (Birds and Natural Habitats Regulations 2011). If invasive species are found to be present within the subject site that the Applicant shall submit a site-specific Invasive Species Management Plan.”

Applicant Response:

In response to Item No. 15, we refer to the Invasive Alien Species Management Plan prepared by Enviroguide for the proposed development. The prepared management plan presents a range of options or addressing the IAPS at the Site and a strategy that will be adopted during the construction and operation of the Proposed Development; in order to manage and prevent the spread of IAPS at the Site and recommends the most appropriate option. This management plan should be implemented by a suitability qualified professional in agreement with the planning authority.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 16

“Green Space Factor (GSF)

A Green Space Factor (GSF) Worksheet shall be submitted by the Applicant for the proposed development detailing how they have achieved the appropriate the minimum Green Space Factor (GSF) scoring established by their land use zoning. Minimum required scores for different land use zonings are included in Table 1 below.

Zoning Minimum Score

Res 0.5

RES-N 0.5

SDZ 0.5

REGEN 0.5

TC 0.5

DC 0.5

VC 0.5

MRC 0.5

LC 0.5

EE 0.5

RW 0.5

HA-DM 0.7

HA-LV 0.7

HA-DV 0.7

OS 0.7

RU 0.7

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

Applicant Response:

In response to Item No. 16, we refer to the cover letter provided by Áit Landscape and Urbanism.

A greening factor is a measurement that describes the quantity and quality of landscaping and GI across a defined spatial area. This measurement comprises a ratio that compares amount of green space to the amount of impermeable ‘grey’ space in a subject site. As a planning tool, this ratio can be used to assess both the existing green cover within a site and the impact of new development, based on the quantity and quality of new green space provided.

We note the existing condition includes extensive hard standing, impermeable concrete and asphalt and low-quality poplar trees on the perimeter. We refer to the following list of green infrastructure measures have been incorporated into the overall design:

- Green Roofs
- Pollinator friendly beds, verges and strips
- Perennial planting
- New tree and shrub planting
- Grass lawn
- Permeable paving

The green space factor for the zoned REGEN site is 0.5, as outlined in the South Dublin Green Space Factor Guidance Note prepared by South Dublin County Council.

The scoring system has been applied with one caveat - the scoring for proposed trees is not based on an area derived from tree stem girth at installation, as outlined within the Green Space Factor Guidance Note – this method of calculation produces such a low score as to be unrepresentative of the green infrastructural and biodiversity benefits associated with the planting of new urban trees. As an alternative, we suggest the use of Natural England’s Biodiversity Metric Calculation Tool scoring system for newly planted trees, the tool being widely utilised as a metric of habitats and places within that jurisdiction.

The Urban Tree Helper, which forms part of the calculation tool, proposes an RPA area scoring for new trees based on tree size (small, medium & large) at 30 years post planting.

The area calculation allows for temporal risk by the utilising a negative multiplier, which has also been applied in the Cookstown calculations to take account of time to full maturity development.

When applying scores for the proposed development, the Biodiversity Metric Calculation Tool scoring method for new trees has been applied to derive an area metric for input into the Green Factor Tool Score. The existing site achieves a Final GI Score of 0.23. Scoring of the proposed scheme utilising the Urban Tree Helper method achieves a Final GI Score of 0.71, with a score of 0.5 being required for REGEN Sites to ‘pass’ within the Green Factor Tool scoring system.

The presented score is more reflective of the green infrastructural benefits that would be seen with the planting of new urban trees - a number of which include large and long-lived species such as Oak. In addition, the proposed site wide area of soft landscape and green roof amounts to 45% of the Development Site (transitional care facility Ref. SD22A/0361 and proposed LRD application).

Utilising the SDCC Parks Department Green Factor Calculator Scoring criterion for new trees, based on an area metric derived from stem diameter at installation, the score for the planting of over one hundred and thirty new trees gives an area value of 0.655 square metres, which is not reflective of the value they would provide.

We refer to the completed green factor worksheets below and enclosed in Áit’s further information response for more information.

Green Space Factor Tool South Dublin County Council				Green Space Factor Tool South Dublin County Council			
User Input Indicated by Orange fields				User Input Indicated by Orange fields			
Zoning lookup				Zoning lookup			
Minimum GI Score				Minimum GI Score			
REGEN				REGEN			
0.5				0.5			
1. Enter Development Site Area m² HERE >		7864		1. Enter Development Site Area m² HERE >		7864	
Surface Type (see tab for detailed descriptions)	Factor	Proposed Surface Area m²	Factor Values	Surface Type (see tab for detailed descriptions)	Factor	Proposed Surface Area m²	Factor Values
1. Short Lawn	0.3	0	0	1. Short Lawn	0.3	0	0
2. Tall Lawn (w/td, not mown)	0.5	1234	617	2. Tall Lawn (w/td, not mown)	0.5	1242	620
Permeable Paving	0.8	210	213	Permeable Paving	0.8	690	207
Vegetation	0	0	0	Vegetation	0	0	0
4a. Vegetation-Shrub below 3m	0.4	0	0	4a. Vegetation-Shrub below 3m	0.4	0	0
4b. Vegetation-Shrub / Hedge/row above 3m	0.5	60	30	4b. Vegetation-Shrub / Hedge/row above 3m	0.5	60	30
4c. Vegetation-Pollinator friendly perennial planting	0.5	725	362.5	4c. Vegetation-Pollinator friendly perennial planting	0.5	730	365
4d. Vegetation-Preserved hedge/row	1.2	0	0	4d. Vegetation-Preserved hedge/row	1.2	0	0
Trees	0	0	0	Trees	0	0	0
6a. New Trees	0.6	175	105	6a. New Trees	0.6	9175	3075
6b. Preserved Trees	1.2	0	0	6b. Preserved Trees	1.2	0	0
7. SuDS Intervention (rain garden, bio-swale)	0.6	24	14.4	7. SuDS Intervention (rain garden, bio-swale)	0.6	24	14.4
Green Roof	0	0	0	Green Roof	0	0	0
8a. Green Roofs - intensive green roof (substrate is 200-1200mm in depth)	0.7	0	0	8a. Green Roofs - intensive green roof (substrate is 200-1200mm in depth)	0.7	0	0
8b. Green Roofs - extensive green roof (substrate is 80-220mm in depth)	0.6	692	415.2	8b. Green Roofs - extensive green roof (substrate is 80-220mm in depth)	0.6	692	415.2
10. Green wall	0.4	15	6	10. Green wall	0.4	30	12
11. Retained Open Water	0	0	0	11. Retained Open Water	0	0	0
12. New open water	1.5	0	0	12. New open water	1.5	0	0
Total Equivalent Surface Area of Greening Factors		3,636.00		Total Equivalent Surface Area of Greening Factors		9,591.00	
Green Factor Numerator		1763.50		Green Factor Numerator		5338.00	
Minimum Required GI score	Final GI score	Result		Minimum Required GI score	Final GI score	Result	
0.5	0.23	Fail		0.5	0.71	Pass	

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 17

“HeatNet

The Applicant is requested to investigate the proposal to connect into HeatNet and provide details on futureproofing the development so that it can easily revert to conventional heating in the event HeatNet is no longer available in the future.”

Applicant Response:

In response to Item No. 17, we confirm that the project Mechanical and Electrical Engineers, JV Tierney, have investigated the potential of the proposed development to connect to SDCC’s HeatNet system in the future. The investigation confirmed that the plans for HeatNet expansion in the Cookstown Area do not currently expand as far north as the proposed development site.

On this basis the proposed Transitional Care Facility will be provided with a high efficiency heating plan including a centralised space adaptable for connection to the proposed District Heating Scheme in Cookstown. The proposed design is in compliance with the South Dublin County Development Plan 2022-2028, which indicates that where the District Heating Scheme is not confirmed, new developments should be designed to be able to facilitate connection to a District Heating Scheme when delivered. If the Transitional Care Facility could be integrated into the HeatNet system in the future the centralised heating system would be retired and removed and a heat exchanger would be installed to occupy this space.

We refer the Planning Authority to the ‘Item 17 – HeatNet Response report prepared by JV Tierney submitted as part of this Further Information Response Pack for a detailed overview of the investigation into the potential of the proposal to connect to SDCC’s HeatNet in the future.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Item 18

“Signage

The Applicant has not provided sufficient details in relation to the proposed signage over the main entrance doorway. The Applicant is requested to submit plans, sections and elevations of all signage proposed for the development, along with proposals for any illumination. Where signage is fixed to the building, the Applicant is requested to submit detailed contiguous elevations and sections, to allow for an assessment in full of how the sign will appear once the development is complete.”

Applicant Response:

In response to Item No. 18, we refer to Drawing No. 3514-EML-0C-ZZ-DR-A-0951 prepared by EML Architects which illustrates proposed signage – Cookstown Residential Home. The signage will be mounted above the entrance canopy on a powder coated aluminium plate. The principle dimensions of the sign are 0.6m (high) by 3m (wide).

It is not envisaged that the sign will not be back lit or illuminated in any way.

It is submitted that signage of a similar style and size has been permitted as part of Bartra’s Healthcare Facility in Clondalkin – SDCC Ref. SD18A/0328 (ABP Ref. 304708/19) refers.

We trust that the material provided addresses the issue to the satisfaction of the Planning Authority.

Conclusion

The Applicant has made every attempt to address all items raised as part of the Further Information request and we trust that the Planning Authority will duly consider this submission in full in their assessment of the revised scheme.

It is our considered opinion that the proposal now submitted addresses all concerns raised by the Planning Authority, and we are of the view that any potential issues that may arise following consideration of this submission can be appropriately addressed by condition. As such, we foresee there being no reason to seek clarification on any of the matters given the comprehensive response prepared by the design team in this case.

All considered, we trust that the Planning Authority will look favourably on the proposed development and grant permission for the proposal as appropriate.

Appendix 1 – Response to Previous Refusal Reasons (SD21A/0196 – ABP. 311568)

Item	SDCC Reasons for Refusal (SD21A/0196)	ABP Reasons for Refusal (311568)	Proposed Design Solution
<p>Sequencing and Phasing</p>	<p>The proposed development substantially diverges from the LAP policy on sequencing and implementation and would be physically isolated if delivered prior to adjoining development and/or enhanced connections to either the town centre or a luas station. The proposed density and corresponding low car parking provision at the site exacerbate this issue and could only be accommodated (a) on a larger site capable of establishing its own character and enclosing a viable mixed-use area (as provided for in the LAP), or (b) in tandem with enhanced connectivity and permeability as provided for in the LAP.</p> <p>The site faces significant constraints for regeneration and redevelopment without permissions being in place on adjoining sites. The applicant may wish to expand the subject lands for the benefit of a future application, or wait until permissions are in place on adjoining lands. This notwithstanding, the proposed residential development of this site alone should only progress</p>	<p>The proposed development would in the context where the environs of [the] site is generally in employment and commercial use, be physically isolated from compatible uses and in the absence of confirmed adequate connections and linkages in terms of pedestrian and cycle links towards the town centre and to key public transport routes, would constitute a poor standard of residential amenity for prospective occupants and would give rise to residential and commercial uses which are disconnected from public transport and from the wider area. In this regard, the proposed development would be contrary to the provisions of the Tallaght Town Centre Local Area Plan 2020- 2026, especially Section 8 (implementation and sequencing). The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.</p>	<p>It is submitted that this Further Information Response Pack now addresses the reasons for refusal for the previous scheme on the site (SD22A/0196) relating to sequencing and phasing.</p> <p>The development provides interim upgrades to the existing cycle and pedestrian facilities towards Tallaght Town Centre and the Belgard Luas Stop, offering increased connectivity to the surrounding area and appropriately addressing the Local Authority concerns relating to the site being isolated from Tallaght.</p> <p>An appropriate level of car parking for the Transitional care facility, with 17 no. spaces provided.</p> <p>The development site is in Zone 2 as outlined in the South Dublin County Development Plan 2022-2028 given its proximity to the nearby Luas Red Line stop which has an associated rate as follows:</p> <ul style="list-style-type: none"> • 1 no. car parking space per 8 residents. • 1 no. cycle parking space per 5 staff (long term); • 1 no. cycle parking space per 10 residents (short stay). <p>Based on 131 no. bedspaces in the TCF, this equates to an allowance for 17 no. car spaces. Allowing for a conservative maximum on-site population at one time of 65 no. staff and a peak 131 no. patients, this equates to a cycle parking requirement of 26 no. cycle spaces. All spaces referenced are contained within the site layout and away from the public road. Given that patients of the facility are estimated to, on average, stay for approximately 30 days but 28 no. beds are also allocated for long term care which have an associated expected duration of stay of approximately 3.5 years it is considered that car movements to and from the development will be largely by visitors.</p>



	<p><i>in line with LAP standards and without prejudicing development on adjoining sites. In the current context, the proposed development would be isolated development and would provide a poor standard of residential amenity for that reason, and thereby undermine the regeneration priorities as outlined in the zoning objective. The development would materially contravene Section 8.0 and Objective IS1 of the Tallaght Town Centre Local Area Plan 2020 - 2026 and would be a material contravention of that Plan and would also contravene Policy H3 (Housing for Older People) in the South Dublin County Development Plan 2016 - 2022 in that it is not in an established residential and mixed use area and is not at a location proximate to services and amenities.</i></p>		<p>Given the development proximity to the Belgard Road Luas Stop, Tallaght Town Centre and surrounding residential developments it is considered that staff of the TCF facility will use sustainable modes of transport to access the facility.</p> <p>Full details of the proposed upgrades to the pedestrian and cycle infrastructure surrounding the site are included on the following drawings prepared by OCSC now submitted to the planning authority:</p> <p>B981-OCSC-XX-XX-DR-C-0111 (Proposed Road Layout Sheet 1 of 6); B981-OCSC-XX-XX-DR-C-0112 (Proposed Road Layout Sheet 2 of 6); B981-OCSC-XX-XX-DR-C-0113 (Proposed Road Layout Sheet 3 of 6); B981-OCSC-XX-XX-DR-C-0114 (Proposed Road Layout Sheet 4 of 6); B981-OCSC-XX-XX-DR-C-0115 (Proposed Road Layout Sheet 5 of 6); B981-OCSC-XX-XX-DR-C-0116 (Proposed Road Layout Sheet 6 of 6)</p>
<p>Intensity of Development - Height and Plot Ratio</p>	<p><i>The present proposal, stated by the applicant to have a plot ratio of 1.49, represents overdevelopment. This is contrary to specifications of plot ratio in section 3.3 the Tallaght Town Centre Local Area Plan 2020 - 2026, under which a maximum plot ratio of 1 is specified, with flexibility for 20% increase of plot ratio where certain conditions are met. The proposed additional height and</i></p>	<p><i>The proposed development would materially contravene the policies and objectives of the Tallaght Town Centre Local Area Plan 2020-2026 in respect of building height and plot ratio. Having regard to the provisions of this plan, which are considered reasonable, and to the nature, extent, scale and layout of the proposed development, including the eight storey height of Block A</i></p>	<p>It is noted that whilst the proposed Transitional Care Facility exceeds the height and plot ratio policies and objectives outlined in the Tallaght Town Centre Local Area Plan 2020 a full rationale for the proposed development exceeding these required standards is included as a response to Item 3 of this Further Information response report.</p> <p>It is considered that the future overall development of the site consisting of the proposed TCF facility in conjunction with a future residential proposal on the eastern portion of the site (subject to a separate planning application), will significantly reduce the plot ratio from the figure of 1.49 as per the previously refused application SDCC Ref. SD22A/0196.</p>

	<p>plot ratio is not justified under Section 2.6 of the Local Area Plan with reference to the public realm improvements provided on the site, in particular, the dominance of the internal street by car parking and the poor provision for pedestrians. The provision of 8-storey development fronting onto the internal street is inappropriate and would be detrimental to the enjoyment and amenity of that space. As such, the proposed development does not comply with the Building Height Strategy contained in Chapter 2 of the Local Area Plan, and would undermine the regeneration of the area by itself and by the precedent it would set.</p>	<p>along First Avenue and along the internal street within the proposed scheme, the poor provision of pedestrian movement within the site and the dominance of surface car parking, the Board is not satisfied that a material contravention of the Plan would be justified, and further, that such material contravention of the Plan by itself and by the precedent it would set, would compromise the coherent redevelopment and regeneration of this site and wider area in a manner consistent with the overall provisions of the Local Area Plan. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.</p>	<p>An analysis of the proposed Transitional Care Facility using the 'Contextual Analysis Toolkit' for buildings of increased height has been included as part of the response to FI Item 3 in the Response Report prepared by Brock McClure.</p> <p>Having considered the principles outlined in section 4.3 – Contextual Analysis Toolkit included in Appendix 10 of the South Dublin County Development plan and referring to the envisaged regeneration objectives for this site located in land parcel CT-C included within the Tallaght Town Centre Local Area Plan 2020 it is considered that, following a criteria-based assessment, this site is suitable for the increased Transitional Care Facility height of 5 no. storeys, 1 no. storey above what is envisioned for this site within the Tallaght Town Centre Local Area Plan 2020.</p>
Infrastructure	<p>(a) The proposed development does not include provision for cyclists on Cookstown Road, a major route through the area, as per the requirements of section 3.3 of the Tallaght Town Centre Local Area Plan 2020 – 2026. (b) The isolated nature of the development is exacerbated by the extremely low provision of car parking. The provision of car parking entirely on the street would lead to dominance of the streetscape by cars,</p>	<p>On the basis of the information submitted with the application and appeal, the Board is not satisfied that the applicant has demonstrated that the proposed development can be accommodated within the existing public wastewater network. In the absence of confirmed evidence within the application and appeal documentation, that the existing network can accommodate wastewater</p>	<p>The proposed development now provides for pedestrian and cycle upgrades along Cookstown Road.</p> <p>It is noted that the South Dublin Active Travel Plan is due to be published which will identify the areas where upgrade works are required within the Tallaght Area. It is considered that if the applicant carries out full upgrade works towards the Belgard Luas Stop, that there is the possibility that these may need to be reversed depending on the content of the final Active Travel Plan.</p> <p>It is also considered that if permanent pedestrian and cycle upgrades are provided at this early stage of the regeneration of the Cookstown area, they will be reversed or changed as other regeneration applications are lodged to SDCC in the future. Interim upgrades provide safe and improved cycle and pedestrian</p>

	<p>undermining the comfort and safety of pedestrians and not in accordance with DMURS. (c) Childcare facilities are not proposed as part of this development, contrary to the 2001 Childcare Guidelines and contrary to the infrastructure requirements for Cookstown, set down in section 3.3. of the Tallaght Town Centre Local Area Plan 2020 – 2026. This would undermine the residential amenity of the development and the regeneration of the area, both by itself and by the precedent it would set. (d) Feasibility of the development in terms of water supply and waste water has not been established by Irish Water, having regard to the existing deficiencies in the water supply and wastewater sewerage network in the area and the period within which this constraint may reasonably be expected to cease.</p>	<p>arisings generated from this specific scheme at this site, or the identification of the nature and scope of any upgrade works, including the timeframe for implementation of same, which would be necessary to facilitate the connection of the proposed development to the wastewater network, it is considered that the proposed development would be premature. The proposed development, would, therefore , be contrary to the proper planning and sustainable development of the area.</p>	<p>links and are easily changeable/ reversible to align with other future regenerative development in the Cookstown area.</p> <p>It is therefore considered that interim upgrade works are more appropriate for the surrounding area as these can be easily reversed to align with the goals and objectives included within the final SDCC Active Travel Plan when published, if required.</p> <p>The applicant and design team note that interim upgrade works to surrounding pedestrian and cycle infrastructure are proposed as part of the subject application. The proposed interim upgrade works will improve cycle infrastructure to the northeast towards the Belgard Luas Stop and to the south of the site along Cookstown Road, connecting the site to Tallaght Town Centre.</p> <p>It is considered that reduced parking is appropriate for the subject site given the proximity of the site to the Belgard Luas and Tallaght Town Centre. A reduced parking ratio promotes sustainable travel, which has been further promoted in the proposal via the quantity of bicycle parking spaces proposed. It is considered that a reduced parking ratio would have a positive impact on the operation of the adjoining road network, with reduced traffic volumes being generated.</p>
<p>Residential Layout and Amenities</p>	<p>(a) The sunlight and daylight analysis of the development is not considered to be adequate, and the development would feature poor communal open space to serve Blocks A and B. This would undermine the residential amenity of the development and the regeneration of the area, both by itself and by the precedent it</p>	<p>/</p>	<p>Any refusal reasons associated with the previously proposed residential element on the site will be addressed as part of a future mixed use residential development proposal subject to a separate planning application on the east of the applicant's landholding.</p>

	<p>would set. (b) The layout of the development should be improved in order to increase separation distances between apartment units on upper floors, decrease the dominance of surface car parking, and to ensure the internal street is not excessively enclosed by tall buildings. (c) The glazed corner feature to the north-east of the residential block is inappropriate for a residential development in an urban streetscape. (d) Minimum storage provision in the proposed units appears in some cases to have been counted both as storage and as habitable room space, and this should be revised prior to a grant of permission. (e) Overall provision of space in apartments could be improved prior to a grant of permission in order to comply with section 3.8 of the 'Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities' (2020), without relying on the assessment of 2-bed, 3-person units against the lower minimum apartment size of 63sq.m.</p>		
<p>Public Realm and Water</p>	<p>Inadequate information has been supplied regarding the provision of natural SUDs, or</p>	<p>/</p>	<p>Extensive SuDS measures were incorporated into the submitted drainage design. However, in line with the requests set out in this FI Item, additional measures have been incorporated. SuDS measures now incorporated include:</p>

	<p>green infrastructure, in accordance with Chapter 8 of the South Dublin County Development Plan 2016 - 2022. The design of SuDS features is required to be of high quality to achieve a multifunctional space for amenity, biodiversity, and surface water management. Additionally, the applicant has not provided information to show compliance with Policy IE2 of the South Dublin County Development Plan 2016 - 2022. The development would, by itself and by the precedent it would create, undermine the sustainable regeneration of the area and the strengthening of green infrastructure.</p>		<ol style="list-style-type: none"> 1. Green roofs. 2. Tree pits throughout the site. 3. Swales. 4. Rain gardens. 5. Pervious paving. <p>The revised design is considered to have maximised the provision of SuDS measures when considering the constrained, brownfield nature of the site with limited green space and the desire to avoid attenuation measure in public open space areas, particularly those to be taken in charge by SDCC. Please refer to the updated Engineering Services Report submitted as part of this application which includes all of the detail referenced including the SuDS Management Plan details. Also refer to OCSC Drawing B981-OCSC-XX-XX- DR-C-0505 for further details of the updated surface water drainage design incorporating the requested items. An updated tree pit detail can be seen in OCSC Drawing B981-OCSC-XX-XX-DR-C-0535. We refer to the response provided to FI item 16 in this report which provides an outline of the green infrastructure measures that have been incorporated into the overall design of this development proposal.</p>
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