

## SOUTH DUBLIN COUNTY COUNCIL



### INTERNAL MEMORANDUM

#### Public Realm Planning Report

**Development:** Demolition of all existing 1-3 storey industrial/commercial structures and small cafe on site totalling c.5,500sq.m in area; Construction of a 1-5 storey Transitional Care Facility (step-up/step-down) providing 131 bedspaces over partial basement (total floor area c.6,743sq.m) with central courtyard ( c.519sq.m ); The basement consists of a sprinkler tank and pump rooms, water tank room, plant room and workshop; Provision of dining and kitchen areas, siting/family rooms, activity rooms, coffee dock, hair salon, oratory, lobbies/reception areas, ancillary offices and staff areas, stores, toilets, shower/changing facilities, ESB substation, generator, switchroom, service yard and waste areas serving the facility; Lobbies, stair/lifts, photovoltaic panels and green roofs throughout; Partial provision of the pocket park identified in the Tallaght LAP (c.1,286sqm); New vehicular access from First Avenue and egress onto Cookstown Road via a one-way system through the subject site; Entrance signage on the eastern elevation of the proposed facility; All associated site development works, services provision, connection to the water supply, foul and surface water networks on First A venue and Cookstown Road including partial diversion of the foul line to the north east of the site at First A venue, temporary foul pump station, attenuation/bioretention systems, vehicular and pedestrian access including internal road and footpaths, interim pedestrian facilities/public realm upgrade works, landscape and boundary treatment works, tree removal, bicycle storage (76 total spaces), car parking (32 total spaces), set-down

parking spaces, 1 ambulance set-down space serving the facility and delivery/loading areas to First Avenue..

**Location:** Unit 21, First Avenue, Cookstown Industrial Estate, Dublin 24  
**Applicant:** Bartra Property Cookstown Limited  
**Reg. Ref:** SD22A/0361 AI  
**Report Date:** 07/03/2023  
**Recommendation:** SEEK CLARIFICATION OF ADDITIONAL INFORMATION  
**Planning Officer:** AOIFE O'CONNOR MASSINGHAM

**Land Use Zoning:** Objective REGEN 'To facilitate enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery.'

**Main Concerns:**

- Insufficient information has been submitted in relation to proposed open space provision with the Development
- Drainage scheme not in compliance with SDCC Guidance. Underground attenuation tanks are not permitted except in exceptional circumstances which do not exist on this site.
- The applicant has failed to achieve the required Green Space Factor score of 0.5 for the subject site. The removal of existing trees and the lack of implementation of natural SUDs measures are making achieving the score much more difficult.
- The proposals for the park require further development and contact with adjoining landowners to agree a coordinated design.

**PUBLIC REALM COMMENTS**

In relation to the above proposed development, this section has reviewed the application and has the following comments.

In terms of items relating to the Public Realm, the following ADDITIONAL INFORMATION has been submitted by the applicant:

**1. Additional Information Submitted**

#### **Item 4 Car parking and set down areas.**

##### **By Way of a response the applicant has provided the following information:**

The existing grass verge on Cookstown Road is of poor quality and contains a single, small to medium sized birch tree. The verge is set behind high containment kerbs, the replacement of which will be necessary to achieve DMURS compliant streetscape which is accessible to all. Therefore, the replacing of the verge is key to achieving the objectives of the Tallaght Town Centre LAP for Cookstown. However, the concern about the loss of Green Infrastructure is noted - Revised public realm proposals for Cookstown Road now show a reduced quantum of set down and parking spaces, while delivering a comfortable pedestrian and cyclist environment. The revised proposals create a new roadside verge containing bicycle parking to serve the retail units and deliver a line of street trees to mitigate the loss of the existing grass verge and birch tree.

##### **Parks Response to Item 4:**

This submitted Additional Information is in principle acceptable to the Public Realm Section and shall be implemented in full by the applicant. Opportunity exists to change new verge to Bioretention area to create a string gi link into the development would be a major benefit to the GI on the site

#### **Item 6. Interim plans for residential area of the site**

##### **By Way of a response the applicant has provided the following information:**

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.

##### **Parks Response to Item 6:**

This submitted Additional Information is in principle acceptable to the Public Realm Section and shall be implemented in full by the applicant.

#### **Item 12. Landscape Design Proposals**

##### **By Way of a response the applicant has provided the following information:**

12a - the applicant has submitted a fully detailed landscape plan and specification and associated Landscape Report. (21SD01DR-300 & DR-301)

12(i) Landscape Design Report and Rational

12(ii) Landscape Plan Drawings (21SD01-DR-300 & 21SD01-DR-301, 21SD01-DR-340) and Section 06 Proposed Planting Schedule of the submitted Landscape Report

12(iii) Submitted landscape plans and landscape report provided details of hard and soft landscape proposals.

12(iv) Applicant states that the landscape proposals for the development site are designed to provide amenity for residents and public users of the external spaces.

12(v) Applicant states that landscape design has been developed and coordinated with consulting engineers' drainage design to incorporate natural SUDS in the development. Landscape Plan Drawings (21SD01-DR-300 & DR-301) and OCSC Drawing B981-OCSC-XX-XXDR-C-0505 & OCSC Drawing B981-OCSC-XX-XXDR-C-0535.

12(vi) The submitted Landscape Report now contains a Green Infrastructure Section (Section 2.0) detailing the sites connection to the local LAP GI Network and showing the sites location in the context of the wider county GI Strategy Map

12(vii) The applicant has provided an indicative layout for the pocket park only. The applicant has stated that they cannot provide a schedule for the delivery of the pocket park.

12(viii) The applicant has submitted a Landscape Report which contains a GI Section (Section 2.0)

12(viii) a - The applicant has submitted a site location map

12(viii) b – The landscape report contains site survey/analysis and identifies existing GI

12(viii) c – The GI Section of the Landscape Report contains diagrams and mapping indication how the development will link into and enhance the wider GI Network.

12(viii) d – Landscape Plan Drawings (21SD01DR-300 & DR-301) and Landscape Report

12(viii) e – Applicant has submitted an invasive species report

12 (ix) The applicant has submitted a play space diagram and play rationale as part of the submitted landscape report & drawing 21SD01-DR-340.

#### **Parks Response to Item 12:**

This scheme is still deficient in green infrastructure elements in the landscape. More effort to include bioretention areas, swales and other similar items throughout the scheme are required.

There is potential to include new open water in the park. As well as improving amenity and biodiversity these interventions would help with the gsf score. Play proposal needs to be improved. Further engagement with neighbouring landowners required on the local park. Landscape architect should contact Public Realm prior to resubmission.

#### **Item 13 Sustainable Urban Drainage Systems**

**By Way of a response the applicant has provided the following information:**

SUDs Measures now incorporated include:

- 11 Tree Pits
- 1 Swale
- 1 Rain Gardens

- Pervious paving

OCSC Drawing B981-OCSC-XX-XXDR-C-0505 & OCSC Drawing B981-OCSC-XX-XXDR-C-0535.

**Parks Response to Item 13:**

The scheme still relies on an underground attenuation tank which is contrary to SDCC policy and Guidance. There is much more scope for natural SUDs throughout the site.

**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.

**By Way of a response the applicant has provided the following information:**

The applicant has submitted a Bat Activity Survey Report prepared by Enviroguide.

**Parks Response to Item 14:**

This submitted Additional Information is in principle acceptable to the Public Realm Section. The recommendations and any proposed mitigation measures contained in the submitted report shall be implemented in full by the applicant.

**Item 15. Invasive Species Report**

**By Way of a response the applicant has provided the following information:**

The applicant has submitted an Alien Species Management Plan prepared by Enviroguide.

**Parks Response to Item 15:**

This submitted Additional Information is in principle acceptable to the Public Realm Section. The recommendations and any proposed mitigation measures contained in the submitted report shall be implemented in full by the applicant.

**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.

**By Way of a response the applicant has provided the following information:**

The applicant has submitted GSF worksheet but has achieved a score of 0.23 which is a fail. A minimum score of 0.5 is required for this development.

**Parks Response to Item 15:**

The GSF score can be greatly improved with additional natural suds measures across the site. Please contact [colleran@sdublincoco.ie](mailto:colleran@sdublincoco.ie) to discuss and agree amended proposals to improve the scoring.

**The Public Realm Section has assessed the proposed development in accordance with the policies and objectives of the County Development Plan 2022-2028 and with best practice guidelines and recommends the following CLARIFICATION of ADDITIONAL INFORMATION be provided:**

**1. SUDS**

Clarify how Additional natural SUDS features will be incorporated into the proposed drainage system for the development such as rain gardens, detention basins, filter drains, swales etc. In addition, the applicant shall provide the following:

- Removal of proposal for underground attenuation.
- Demonstrate the treatment train, biodiversity value and amenity value of the SUDS proposals for the catchment in the residential areas.

Clarification of additional information is requested to fill in the table below and provide clear explanations/rationale for selecting/not selecting additional natural SUDS measures:

SuDS Measures	Measures to be used on this site	Rationale for selecting/not selecting measure	Area of Feature (m2 )	Attenuation volume of feature (m3 )
Swales				
Integrated constructed Tree Pits				
Green/Blue Roofs (Intensive and Extensive Green Roofs)				
Filter Drain				
Permeable pavement (Grasscrete, Block paving, Porous Asphalt etc.)				
Green wall				

<b>Filter strips</b>				
<b>Bio-retention systems/Raingardens</b>				
<b>Blue Roofs</b>				
<b>Detention Basins</b>				
<b>Retentions basins</b>				
<b>Ponds</b>				
<b>Wetlands</b>				

## 2. Green Space Factor

The applicant is required to demonstrate how they will achieve a GSF score of 0.5.. The applicant is requested to engage with [icolleran@sdublincoco.ie](mailto:icolleran@sdublincoco.ie) Public Realm Section in order to discuss and agree appropriate greening and GI interventions in order to make up the shortfall.

## 3. OPEN SPACE PROVISION:

Insufficient information has been submitted in relation to proposed open space provision with the Development. Under section 8.7.3 of the 2022-2028 CDP the overall standard for public open space is 2.4 hectares per 1,000 population. This will be applied to all developments with a residential element, such as the subject proposal. Within that standard, there are specified percentages as set out in Table 8.2 which must, as a minimum, be provided on site.

**Table 8.2:** Public Open Space Standards

<b>Land Use</b>	<b>Public Open Space Standards (minimum)</b>
Overall Standard	2.4 Ha per 1,000 Population
New Residential Development on Lands Zone RES-N	Minimum 15% of site area
New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area
Institutional Lands / 'Windfall' Sites	Minimum 20% of site area

Public open space shall be provided at the rates specified in Table 8.2 above. As per COS5 Objective 6; the occupancy rate used for the purposes of public open space calculations is 3.5 persons in the

case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.

Under Table 8.2 the specified percentage of open space for the proposed development is a minimum of 10% of the site area. The applicant is therefore requested to provide in tabular form a clear breakdown of the open space provision within the proposed development. If the applicant intends to provide the full public open space onsite, a significant redesign of the open space is required.

#### **4. Pedestrian and Cycle Infrastructure**

The Public Realm Section has concerns regarding the lack of green and street planting proposed as part of the proposals for the pedestrian and cycle infrastructure connecting the subject site to the Belgard Road Luca stop to the north east and transverses section of the Cookstown Road from the subject site to the South. Street Tree Planting and the incorporation of SUDS tree pits should be included as part of these proposals. This addition of street trees and suds tree pits along the proposed pedestrian and cycle infrastructure route will aid the applicant in achieving the GSF for the development. In addition, the boundaries of future developments along this pedestrian and cycle infrastructure route should be set back to allow the sufficient planting of street trees along the entire length of the route.

#### **5. PROVISION OF POCKET PARK (Minimum Area 5,200 sqm)**

As required under the Tallaght Town Centre Local Area Plan a Pocket Park of a Minimum Area 5,200sqm to centrally located in CT-C is to be delivered as part of proposals for residential development in CT-C and to be a condition of planning permission, unless otherwise agreed with the Planning Authority in regard to securing the provision of such open space(s). As part of the Additional Information Request the applicant has only provided an indicative layout for the pocket park only. The applicant has stated that they cannot provide a schedule for the delivery of the pocket park. This is not acceptable to the Public Realm. The applicant is requested to provide a masterplan for this pocket park. The Landscape Masterplan as a minimum should contain information relating to the following:

- Proposed SUDS Features
- Planting Details
- Proposed play /recreational equipment.
- Boundary treatments
- levels
- Proposed furniture.



- Amenity/Biodiversity features

There is potential to use this park for additional natural SUDS features and in order to achieve the appropriate GSF of 0.5.

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**Prepared By: Oisín Egan**  
**Executive Parks Superintendent**

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**Endorsed By: Laurence Colleran**  
**Senior Executive Parks Superintendent**