

Clarification of Further Information

Planning Report (CFI Response Document)

Unit 21,
First Avenue,
Cookstown Industrial Estate
Dublin 24

On behalf of



April 2023



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1.0 Further Information Response to Item No. 1

The Clarification of 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 enclosed as part of the submission.

Item 1

“Height and Density

The Planning Authority does not accept the applicant’s justification for not complying with the provisions of the Tallaght Town Centre Local Area Plan 2020 in relation to height and plot ratio. This non-compliance is not acceptable to the Planning Authority and would set an undesirable precedent for the realisation of the clear vision of the LAP. To address these concerns, the applicant is required to submit revised details including as follows:

- A. *Removal of the fourth floor / fifth storey.*
- B. *Calculations showing compliance with the plot ratio for the site, considering the maximum range allowable per the LAP and providing a detailed justification, with figures, in the event of exceeding the plot ratio. The applicant should note that this application is being considered in isolation of any future scheme that may come forward within the ownership boundary of the applicant. The proposal in terms of car parking, open space, plot ratio and density must all be acceptable in isolation of future development. In this regard, the applicant cannot rely on any works potentially granted at the site in future to subsidise or meet the requirements of future development proposals.”*

Applicant’s Response

Prior to addressing CFI Item No. 1, we draw the Planning Authority’s attention to the policies and objectives of the County Development Plan that support increased building height.

These include:

Chapter 5 Quality Design and Healthy Placemaking

- Section 5.2.2 Context
- Section 5.2.6 High Quality and Inclusive Development
- Section 5.2.7 Density and Building Heights

Chapter 12 Implementation and Monitoring

- Section 12.5.3 Density and Building Heights

Appendix 10 Building Height and Density Guide 2022

No.	SDCC Development Plan Policy Objectives Pertaining to Building Height and Density
1.	<p>Section 5.2.2 Policy QDP3 Objective 6: <i>To ensure that higher buildings in established areas respect the surrounding context and take account of heights and their impact on light and the negative impact that they may have on existing communities to ensure consistency with regard to Healthy Placemaking.</i></p>
Applicant’s Response	<p>The subject proposal located on a brownfield site in an area designated and zoned ‘REGEN’ with wider objectives to regenerate Cookstown Industrial Estate, is the prime location for increased heights. All required assessments were undertaken by the Applicant to demonstrate the increased height would have minimal impact on the surrounding properties now and in the future.</p> <p>A Sunlight and Daylight Assessment prepared by J.V. Tierney confirmed no significant impact to light to the adjoining properties. Similarly, the increased height will have a nominal impact on the microclimate of the area.</p> <p>We note that the SDCC Development Plan which came into effect in August 2022 in certain instances relating to building height supersedes the Tallaght LAP (July 2020).</p>

Section 5.2.6 Policy QDP7: High Quality Design – Development General
 Promote and facilitate development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture.

QDP7 Objective 1:

To actively promote high quality design through the policies and objectives which form ‘The Plan Approach’ to creating sustainable and successful neighbourhoods and through the implementation of South Dublin County’s Building Height and Density Guide.



Figure 1: Eight Key Design Principles

2.

<p>Applicant's Response</p>	<p>The planning application was accompanied by a robust Architect's Design Statement which acknowledges the eight design principles have been considered and incorporated into the subject design.</p> <p>A full response to South Dublin County's Building Height and Density Guide is provided below.</p>
<p>3.</p>	<p>Section 5.2.6 Policy QDP7: High Quality Design – Street Width and Height QDP7 Objective 7: <i>To ensure that all proposals for development contribute positively to providing a coherent enclosure of streets and public spaces, taking into consideration the proportions and activities of buildings on both sides of a street or surrounding a public space, providing for good standards of daylight and sunlight, and micro climatic conditions and having regard to the guidance and principles set out in the South Dublin County's Building Height and Density Guide and the Design Manual for Urban Streets and Roads (DMURS) (2019).</i></p>
<p>Applicant's Response</p>	<p>The proposed building height of 5 storeys (c.17.5m high) creates suitable enclosure with First Avenue to the north a c.8m wide street (edge of kerb) and c.15.9m (from back of the footpaths on either side of the road). The internal environment will further enclose the space to create a human-scale neighbourhood environment. The southern elevation fronting the pocket park is reduced to 1-5 storeys responding to the associated recreational use.</p> <p>We reiterate that the Sunlight and Daylight Assessment prepared by J.V. Tierney which confirms no significant impact to light to the adjoining properties. Similarly, the increased height will have a nominal impact on the microclimate of the area.</p> <p>A full response to South Dublin County's Building Height and Density Guide is provided below.</p> <p>We refer to the OCSC Consulting Engineers reports, cover letters and Road Safety Audit for more information relating to DMURS Compliance.</p>
<p>4.</p>	<p>Section 12.5.3 Density and Building Heights <i>In line with the provisions of the South Dublin Building Heights and Density Guide, development proposals for increased building heights and densities shall be accompanied by a contextual analysis by which the suitability or otherwise of different density and height levels can be assessed with reference to the receiving environment of the proposed development (see Section 5.2.7 and Appendix 10).</i></p> <p><i>Proposals are required to demonstrate to the satisfaction of the Planning Authority that the overall positive benefits of the development justify the scale of increased height being proposed.</i></p> <p><i>In order to demonstrate the overall positive benefits and justify the scale of increased height being proposed a detailed analysis of the existing context and a demonstration that the proposed height increase is contextually appropriate will be required.</i></p> <p><i>This process of analysis shall be considered alongside the provisions set out in the 'Urban Design Manual – A Best Practice Guide' (2009) which forms a key component in the design and planning processes for higher density and larger scale development proposals.</i></p>
<p>Applicant's Response</p>	<p>The site's existing condition had several shortfalls including:</p> <ul style="list-style-type: none"> • Vacant commercial premises; • Poor commercial/industrial design quality; • Poor pedestrian and cyclist permeability; • Poor road user integration; and • No public open space or amenity space.

<p>The subject proposal employs several key features that justify the increased height including:</p> <ul style="list-style-type: none"> • Active perimeter and internal street frontage; • Good street enclosure; • Creation of a quality commercial environment that contributes to placemaking with the introduction of courtyard amenity areas, public open spaces and tree lined internal streets; • Quality built form using sustainable materials; • State of the art transitional care facility will bring the site into active use, removing vacancy and contributing to the economic vibrancy of the area; and • Public realm improvements will enhance permeability and accessibility for all users irrespective of mobility. <p>We refer to Section 8 of the BMC Planning Report originally submitted which details compliance with the Urban Design Manual – A Best Practice Guide' (2009).</p>	<p>5.</p>
<p>Section 5.2.7 Policy QP8: High Quality Design – Building Height and Density Guide (BHDG) issued by the DHLGH through the implementation of the Assessment Toolkit set out in the South Dublin County's Building Heights and Density Guide 2021.</p> <p>QP8 Objective 1: To assess development proposals in accordance with the Building Height and Density Guide set out in Appendix 10 of this Development Plan and associated planning guidelines. In this regard, all medium to large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq m or as otherwise required by the Planning Authority) shall be accompanied by a 'Design Statement'. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in South Dublin County's Height and Density Guide. Any departures within the proposed development from the guidance set out in the Building Height and Density Guide for South Dublin County (Appendix 10) shall be clearly highlighted in the Design Statement. (See Chapter 12: Implementation and Monitoring).</p> <p>QP8 Objective 2: In accordance with NPO35, SPPR1 and SPPR3, to proactively consider increased building heights on lands zoned Regeneration (Regen), Major Retail Centre (MRC), District Centre (DC), Local Centre (LC), Town Centre (TC) and New Residential (Res-N) and on sites demonstrated as having the capacity to accommodate increased densities in line with the locational criteria of Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) and the Urban Design Manual – Best Practice Guidelines (2009), where it is clearly demonstrated by means of an urban design analysis carried out in accordance with the provisions of South Dublin County's Building Height and Density Guide that it is contextually appropriate to do so.</p> <p>National Policy Objective 35 – National Planning Framework Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.</p> <p>SPPR 1 – Urban Development and Building Height Guidelines In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.</p> <p>SPPR 3 – Urban Development and Building Height Guidelines It is a specific planning policy requirement that where: (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and</p>	

	<p>2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.</p> <p>(B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme</p> <p>(C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.</p>
<p>Applicant's Response</p>	<p>As noted above, the planning application is accompanied by a robust Architect's Design Statement which acknowledges the eight design principles have been considered and incorporated into the subject design.</p> <p>A full response to South Dublin County's Building Height and Density Guide is provided below.</p> <p>We note that NPO 35, SPPR 1 and SPPR 3 relate to residential development. The subject proposal is commercial in nature providing step-down services to patients.</p> <p>We refer to Section 7 of the BMC Planning Report previously submitted demonstrating compliance with NPO35, SPPR1 and SPPR3 and Section 8 in relation to the Urban Design Manual – Best Practice Guidelines (2009).</p> <p>We draw the Planning Authority's attention to the Consultation Paper published in 2023 in relation to the Sustainable and Compact Settlements Guidelines for Planning Authorities. Although the report relates specifically to residential development, the key issues are relevant as they demonstrate the Government's intention to move to a more compact urban environment with sustainable features including reduced parking. The proposed density for cities including major town centres is 40-200 dph. The paper goes onto state:</p> <p><i>"The general approach would be that densities at the upper end of the specified range are applied at the most central and most accessible urban locations, with densities at the mid-point and lower end of the range as proximity and accessibility reduce."</i></p> <p><i>"Key design principles include reduced plot sizes and a tighter arrangement of houses, narrower streets, reduced car parking and the distribution of private open space in the form of patios and / or upper level terraces and balconies."</i></p> <p><i>"In order to meet the targets set out in the National Sustainable Mobility Policy 2022 and in CAP23 for reduced private car travel it will be necessary to apply a graduated approach to the management of car parking within new residential development. In 'Cities', 'Metropolitan Towns' and 'Large Towns (10,000+ population)' car parking should be graduated based on location and access to services by public transport, walking and cycling. In areas of high accessibility, car-parking provision should be minimised, substantially reduced or wholly eliminated, while in areas of medium accessibility, car-parking provision should be substantially reduced."</i></p> <p>It is considered that the Government's sentiments described in the Sustainable and Compact Settlements Guidelines for Planning Authorities Consultation Paper 2023 highlight the discrepancies around height, density, form and parking provision as outlined in the Tallaght LAP 2020.</p>

<p>6.</p>	<p>Section 5.2.7</p> <p><i>The Building Height and Density Guide (BHDG) for South Dublin County forms the primary policy basis and toolkit to employ the delivery of increased building height and density within the County in a proactive but considered manner.</i></p> <p><i>Securing compact and sustainable urban growth in South Dublin County will mean focusing on reusing previously developed ‘brownfield’ land in the County as well as undeveloped infill sites, particularly those served by good public transport.</i></p> <p><i>The BHDG in Appendix 10 of this plan is intended to complement the Urban Design Manual – Best Practice Guidelines (2009) which identified a set of component questions at various scales which together formed a complete urban design analysis of the development proposal. In the BHDG, certain parameters of the more general urban design assessment are expanded to more directly address issues relating to height, density, and intensification</i></p> <p><i>The guide sets out the following 4-step approach which includes;</i></p> <div data-bbox="384 752 1350 952" style="text-align: center;"> <table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td style="background-color: #c85130; color: white; padding: 5px;"> 1. Policy Planning Context National and Local </td> <td style="background-color: #2e8b8b; color: white; padding: 5px;"> 2. Thinking Understanding Considerations around Density and Height </td> <td style="background-color: #76b82a; color: white; padding: 5px;"> 3. Application Developing a Criteria-based Approach </td> <td style="background-color: #4b3994; color: white; padding: 5px;"> 4. Illustration Indicative Development Scenarios </td> </tr> </table> </div> <p><i>Proposals for increased building heights can be expressed in terms of their amplification of prevailing heights by means of a Contextual Height Ratio.</i></p> <p><i>Proposed increased heights should be proportionate to the role and function of buildings and the scale of their impact on the receiving environment. By this measure, the more prominent a role the development plays at the larger urban scale the more a larger contextual height ratio would be expected;</i></p>	1. Policy Planning Context National and Local	2. Thinking Understanding Considerations around Density and Height	3. Application Developing a Criteria-based Approach	4. Illustration Indicative Development Scenarios
1. Policy Planning Context National and Local	2. Thinking Understanding Considerations around Density and Height	3. Application Developing a Criteria-based Approach	4. Illustration Indicative Development Scenarios		
<p>Applicant's Response</p>	<p>The rationale for increased heights is driven by a context approach to building heights having regard to the 'REGEN' zoning of the site.</p> <p>The prevailing height of the wider area cannot be relied upon as a means for basing all new development, given the LAP advocates for increased heights as part of the regeneration objectives for the LAP and in particular Cookstown CT-C area.</p> <p>The proposal is just 1 storey higher than those specified in the LAP. In this instance, the amplification of the height is marginal compared to the indicative height of the LAP. Although the height is increased by 1 storey, it cannot be considered a significant, or a non-thematic variation on the indicative heights of the LAP. The T-Shaped layout of the 5 storey element provides more active frontage to First Avenue while the central spine running from north to south is set-back and augments the perceived building height east and west of the site. A single storey element fronts the southern elevation.</p> <p>The contextual height ratio of the 5 storey Transitional Care Facility is represented as 1.25xCH in the context of the 4 storey indicative heights outlined in the LAP.</p> <p>In this regard, the marginal increase from 4 to 5 storeys is proportionate to the role and function of the facility as well as the overall viability of the project at 131 bedspaces.</p>				

We reiterate 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.

As noted in Appendix 10 of the County Development Plan, the SPPRs take precedence over any conflicting policies and objectives of development plans, local area plans and – subject to any necessary review – of strategic development zone planning schemes.

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 just 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. storey 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 on a net 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 and the viability of this commercial development. 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 acute hospitals in the greater Dublin area 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. Additional rain gardens have been introduced to the courtyard for the benefit of green infrastructure, biodiversity and residential amenity improvements, as part of this CFI Response.
- **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.

Item No. 1a and 1b

“Height and Density

The Planning Authority does not accept the applicant’s justification for not complying with the provisions of the Tallaght Town Centre Local Area Plan 2020 in relation to height and plot ratio. This non-compliance is not acceptable to the Planning Authority and would set an undesirable precedent for the realisation of the clear vision of the LAP. To address these concerns, the applicant is required to submit revised details including as follows:

- A. Removal of the fourth floor / fifth storey.***
- B. Calculations showing compliance with the plot ratio for the site, considering the maximum range allowable per the LAP and providing a detailed justification, with figures, in the event of exceeding the plot ratio. The applicant should note that this application is being considered in isolation of any future scheme that may come forward within the ownership boundary of the applicant. The proposal in terms of car parking, open space, plot ratio and density must all be acceptable in isolation of future development. In this regard, the applicant cannot rely on any works potentially granted at the site in future to subsidise or meet the requirements of future development proposals.”***

Applicant’s Response

In response to Item No. 1a, we note that the County Development Plan including Appendix 10 Building Height and Density Guide 2022 **makes no reference to plot ratio as a metric for calculating density**. It is our considered opinion that the County Development Plan which came into effect in 3 August 2022 supersedes the Tallaght LAP 2020.

Removal of 5th Storey

The 5 storey facility is the Applicant’s preferred option at this time. Notwithstanding this, the Applicant has explored the removal of the fourth floor/fifth storey and notes the reduced height results in the reduction of 28 no. bedspaces providing a plot ratio of 1.46. We refer to the accompanying elevation and section drawings prepared by EML Architects for more information.

Plot ratio is calculated on the basis of a relatively small site area of c.0.38ha (excluding the residential site to the east, partial pocket park and parking associated with the proposed residential development). The developable area is denoted by the green line in the accompanying Site Layout Plan prepared by EML Architects.

	Site Area	Gross Floor Area	Number of Storeys/Height	Plot Ratio	Bedspaces
Option 1 (Proposed)	0.38ha	6743sqm	5 storeys/17.5m	1.78	131
Option 2 - 1 floor removed	0.38ha	5513sqm	4 storeys/c.14.3m	1.46	103

Table 1 – Site Statistics based on Proposed and Reduced Building Height

In order to reduce the plot ratio to below 1.2, almost 2 floors or approximately 2,000sqm would need to be removed reducing the height to 3 storeys below the maximum height range allowable under the LAP. This equates to a reduction of approximately 50 no. bedspaces to total of 81 no. bedspaces. We acknowledge that the Planning Authority can condition this reduction but emphasise that 81 bedspaces would likely result in the project being commercially unviable, adding further delays to the redevelopment of this zoned regeneration site.

The scale and size of the TCF as it stands with a maximum capacity for 131 bedspaces is intended to partially address the demand from the acute hospitals in the Greater Dublin Area. Tallaght University Hospital use the Bartra facility at Beaumont for patients from north Dublin who have completed their acute care needs. The size of such a reduced facility comprising c.81 bedspaces would completely undermine the economic viability of the proposed facility. The Applicant’s preference remains for a 5 storey/131 bedspace facility.

National Mandate - Sláintecare

The need for these facilities as part of the national policy that is Sláintecare was addressed recently by the new CEO of the HSE Bernard Gloster in the recent Irish Independent article on 29 March 2023 who stated:

“No patient would be on a hospital trolley today if the hundreds of people, who no longer need acute care and are occupying a bed were given a suitable step-down transfer, the new head of the HSE said today...”

This is supported by Sláintecare Implementation and Action Strategy 2021-2023 promotes the reduction of all waiting lists, and align the resources/capacity to achieve this goal. Some of the goals of key projects of the Plan seek to:

- Create capacity for acute hospital sites and reduce/eliminate outlier boarding (trolleys);
- Drive down waiting lists (outpatient, inpatient and day case);
- Reduce cancellations, and
- Reduce acute hospital footfall.

In 2022, over 60,000 acute beds days were saved by Bartra’s existing Transition Care beds. Additional TCF capacity will increase this number by approximately 50%. These facilities make a direct contribution to the reduction in waiting times for admission to acute hospital facilities and reduce trolley times for patients with acute medical conditions, thus being a vital element of the achievement of Sláintecare objectives.

Plot Ratio (Overall Site including Proposed/Future Residential Development)

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 6,743sq.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 16,357 sq.m (it is noted that this may be subject to change resulting from further design considerations).

This total GFA of 16,357 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.

Item No. 1b

In response to Item No. 1b, we note that the justification around the height and plot ratio is adequately addressed in the section above. Concerns relating to car parking and open space are addressed hereunder.

Applicant's Response

Car Parking

We refer to the response to Item No. 3 below in this report and OCSC's cover letter accompanying this response for more information in relation to car parking provision.

The breakdown of staff and visitor spaces is based on the precedent examples of the Applicant's other facilities as Beaumont (operational) and Clondalkin (under construction). Based on 131 no. bedspaces in the TCF, this equates to an allowance for 17 no. dedicated car spaces serving the facility. The remaining car parking spaces within the subject site (red line boundary) will serve the future/proposed residential development to the east of the facility.

Allowing for a conservative maximum on-site population of 55 no. staff (day shifts) and 20 no. staff (night shifts), and having regard to staff being employed locally (similar to the Applicant's other facilities), approximately 52 no. staff will avail of sustainable travel means including walking, cycling or public transport and approximately 3 no. car spaces will be reserved for staff parking.

The remaining 14 no. car spaces will serve as visitor spaces including 2 accessible spaces. Organised visiting to the TCF will be permitted predominantly at weekends. In line with infection control measures, visiting will be highly regulated with visitors having to book in advance. This will include availability of parking, if required. 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.

Visiting will generally occur in evenings. It is important to note that visitors normally travel with another visitor, therefore car sharing and multi-occupant vehicle trips will reduce the number of overall vehicle trips per patient to the site.

Taking the above into consideration, the parking requirements associated with the TCF are deemed acceptable and in accordance with relevant standards from Table 12.25 of the Development Plan. Section 12.7.4 of the Plan notes that the provision of parking spaces for car sharing / pooling will be encouraged and will not impact on the maximum rates in Table 12.25. We note that these figures are **maximum standards**. It is therefore unreasonable that the Planning Authority would impose arbitrary minimum parking standards that contradict local and national policy that advocates for reduced parking and sustainable travel.

All spaces referenced are contained within the site layout and away from the public road. Please refer to the architectural layouts submitted with the application indicating the location of all 17 no. dedicated parking spaces proposed.

As noted, patients will not have a long term parking requirement meaning the provided spaces will be used for staff and visitors. Staff parking will be prioritised for those working anti-social hours and long shift times when visitor numbers will be low or non-existent.

The proposed parking provision is considered acceptable having regard to the policy shift outlined in national plans and guidelines that advocate for reduced car parking provision in line with compact city initiatives and carbon reduction targets.

The Sustainable and Compact Settlements Guidelines for Planning Authorities Consultation Paper 2023 goes as far to state:

“In areas of high accessibility, car-parking provision should be minimised, substantially reduced or wholly eliminated, while in areas of medium accessibility, car-parking provision should be substantially reduced.”

The Climate Action Plan 2023 goes onto state:

The range of measures modelled includes known public transport schemes as set out in the National Development Plan (NDP);

- *further acceleration of road space reallocation towards public and active travel modes;*
- **car-free urban centres;**
- **increased parking constraints (including measures to remove incentives/subsidies for workplace car parking);**
- *continued remote and flexible working;*
- *the introduction of congestion charging in cities; and*
- *speed limit reductions on the national road network.*

The National Planning Framework recommends that there should generally be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs of all five.

In addition, the Plan recommends the potential increase of fossil fuel prices on a polluter pays principle as a measure to reduce the frequency and length of fossil-fuelled vehicle trips.

Disincentivising private vehicle use through such measures as the removal of free workplace parking; minimum parking charges introduced in all urban areas and application of congestion charges for journeys across marked cordons.

On the basis of the above national policy supports for reduced parking provision combined with the Applicant's first-hand knowledge of their staff and visitor requirements arising from their operational TCF at Beaumont, we conclude the proposed car parking is wholly acceptable.

Open Space

We note that the County Development Plan does not stipulate an open space standard for commercial development. We note that the pocket park (c.1286sqm) accounts for 10% of the net site area of the proposed residential development application. The space will serve the wider public and complies with the open space requirements of the County Development Plan and planned open space provision set out in the Tallaght LAP.

The central courtyard area within the TCF, accounts for 519sqm. The space is directly accessible and enclosed by the TCF building and will serve patients, visitors and staff of the facility. The courtyard is not accessible to the public. The landscaped space will include island planters with sensory planting, timber benches for seating, rain gardens, ornamental grasses, shade tolerant mixed planting, small and medium trees and specimen shrubs.

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

2.0 Further Information Response to Item No. 2

Item 2

“Pedestrian, Cyclist and Public Realm Upgrades

The LAP has a clear objective in relation to phasing and sequencing of development to ensure that isolated piecemeal pockets of land are not developed without connectivity and linkages. The applicant has proposed temporary pedestrian and cyclist upgrades from the site to Belgard Luas. The Planning Authority is very clear that temporary/interim works are not acceptable to the Council.

A. A design team is being appointed by South Dublin County Council to provide a masterplan for Cookstown, focused on the public realm and to include pedestrian, cyclist and urban design upgrades. The applicant is requested to engage directly with the team appointed and ensure that a scheme of permanent works is agreed and provided, in tandem with the Cookstown masterplan, ensuring full integration of the proposed scheme and public realm works. The applicant may wish to apply for an extension of time in responding to this clarification of additional information request to enable this engagement. The applicant should also note that set down and loading areas outside the current site boundary along Cookstown Road and First Avenue on lands within the public realm and indicated for taking in charge by SDCC, will not be accepted irrespective of the ownership of same. In preparing a proposal for permanent works to be delivered, the applicant should incorporate all relevant items of concern raised in the Stage 1 & 2 Road Safety Audit and ensure public lighting is provided to the satisfaction of the Public Lighting Section. In preparing this response, the applicant should engage with all relevant sections of the Local Authority, and other relevant bodies, to ensure the proposed works will be acceptable prior to submission.

B. The Planning Authority is not satisfied with the lack of permeability facilitated at the southern portion of the site, adjacent to the pocket park. 2 no. car parking spaces shall be omitted and additional plans shall be submitted clearly showing full permeability around the entire pocket park, including the opportunity for connections at the south east corner of the pocket park into the southern adjoining lands. A more detailed masterplan for the pocket park shall be provided, clearly demonstrating connectivity and consideration of desire lines and ensuring that the first phase of the pocket park delivers an attractive, useable space, with the inclusion of biodiversity planting.”

Applicant's Response

Item No. 2a

“A. A design team is being appointed by South Dublin County Council to provide a masterplan for Cookstown, focused on the public realm and to include pedestrian, cyclist and urban design upgrades. The applicant is requested to engage directly with the team appointed and ensure that a scheme of permanent works is agreed and provided, in tandem with the Cookstown masterplan, ensuring full integration of the proposed scheme and public realm works. The applicant may wish to apply for an extension of time in responding to this clarification of additional information request to enable this engagement. The applicant should also note that set down and loading areas outside the current site boundary along Cookstown Road and First Avenue on lands within the public realm and indicated for taking in charge by SDCC, will not be accepted irrespective of the ownership of same. In preparing a proposal for permanent works to be delivered, the applicant should incorporate all relevant items of concern raised in the Stage 1 & 2 Road Safety Audit and ensure public lighting is provided to the satisfaction of the Public Lighting Section. In preparing this response, the applicant should engage with all relevant sections of the Local Authority, and other relevant bodies, to ensure the proposed works will be acceptable prior to submission.”

In response to Item No. 2a, we note that the project design team has endeavoured to address the Planning Authority's 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 the Planning Authority to OCS's cover letter accompanying this CFI Response for further information.

Active Travel Plan and Proposed Upgrade Works

We note that OCSC engaged with Mbakure Johnson of the SDCC Active Travel Plan division on the 20 April 2023. Mr Johnson noted that the project designers have only recently been appointed and he could not provide an update on the project timeline as his team are still working up the program of works.

In the absence of any definitive timeframe or proposed layout drawings for the permanent upgrade works, the interim design solution proposed under this application will offer notable improvements to both pedestrian and cycle accessibility at the site which are necessary to facilitate its development. The Applicant is proposing interim measures as they could not possibly sustain the costs associated with development of permanent upgrade works. The interim measures build on the existing infrastructure in the area to offer key localised improvements which achieve the stated accessibility objectives of local planning policy. These are realistic and deliverable in the context of the development proposed, while also avoiding abortive works insofar as is possible. We confirm that the proposed design **does not compromise** the delivery of the active travel plan in the future.

As stated on the Active Travel Website, current projects characterised as ‘now’ projects will be completed within 2 years i.e. 2025, well in advance of any possible opening of the subject facility.

The estimated delivery of the proposed upgrade works will be in the later phases of the construction programme - approximately 2026. It is extremely likely therefore that the active travel plan will align with the completion of the proposed development. On this basis, the subject proposal is seen as a sensible solution until the active travel plan is agreed.

We understand that €50 million were available last year for NTA grants relating to pedestrian and cycle facilities and €293 million is available for such facilities this year. These grants are only available to local authorities (not private entities) and should be availed by SDCC to promote the regeneration of the area.

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)*

We reiterate that the Applicant is committed to working with SDCC with respect to the appropriate detailed design and delivery of any active travel measures proposed to avoid abortive works and align the respective proposals accordingly. It is considered that such an approach can be facilitated through appropriate condition.

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 amended to align with future regeneration projects and/or the goals and objectives of the final SDCC Active Travel Plan, as required.

Set-Down Bays

We summarise that the set down and servicing bays are provided for within the development site along the internal road meaning the development is not reliant on the proposed boundary bays. The set-down and servicing bays are considered appropriate to protect the integrity of the public road network while also facilitating the delivery and operation of development uses in line with the Development Plan and LAP requirements. Set-down parking has already been minimised on receipt of the Planning authority’s concerns. However, we contend that the commercial

units will require some degree of set-down parking to prevent hazardous parking on the public footpath or obstruction to the public roads. We refer to OCSC's cover letter for more information in this regard.

The design has been subject to an independent Road Safety Audit carried out by a qualified professional and amended accordingly to ensure all issues highlighted, which were minor in nature, have been addressed in full.

We trust that the material provided in relation to Item No. 2a addresses the issue to the satisfaction of the Planning Authority.

Item No. 2b

"B *The Planning Authority is not satisfied with the lack of permeability facilitated at the southern portion of the site, adjacent to the pocket park. 2 no. car parking spaces shall be omitted and additional plans shall be submitted clearly showing full permeability around the entire pocket park, including the opportunity for connections at the south east corner of the pocket park into the southern adjoining lands. A more detailed masterplan for the pocket park shall be provided, clearly demonstrating connectivity and consideration of desire lines and ensuring that the first phase of the pocket park delivers an attractive, useable space, with the inclusion of biodiversity planting."*

Applicant's Response

We refer to the cover letter prepared by OCSC and drawings, landscape report and cover letter prepared by Áit Urbanism + Landscape accompanying this response for further information.

Having regard to CFI Item No. 2b, we note that site assembly is not possible given the separate ownership of adjoining sites by third parties and current commercial operations of the sites at this time. However, a 3m wide shared pedestrian and cyclist connection has been introduced to the eastern edge of the pocket park facilitating the future connection with lands south of the subject site.

The shared pedestrian/cyclist connection is incorporated into the landscape design of the pocket park and maintains a total area of c.1286sqm. We refer to Figures 1 and 2 below. No parking spaces are lost as a result of the proposed arrangement. The pocket park is fully permeable and includes a series of paths through the space linking with the existing, proposed and future pedestrian and cyclist networks in the surrounding area.

The lighting plan including lighting columns shown on has been updated to accommodate the new shared pedestrian and cyclist link. We refer to Drawing no. 4046-JCT-00-SI-DR-E-6006 Rev P04 and updated lighting report prepared by J.V. Tierney accompanying this response for more information.

In response to the Planning Authority's concerns relating to the pocket park, a more detailed masterplan has been prepared by Áit Urbanism + Landscape and accompanies this response (Drawing Nos. 21SD01 DR-300, 21SD01 DR-301 and 21SD01 DR-340 refer). The drawings clearly demonstrate connections are aligned with desire lines and routes outlined in the Tallaght LAP. Pedestrian and cyclist priority is maintained through design in accordance with the tertiary nature of the connection as outlined in the Tallaght LAP and is considered compliant with DMURS requirements. We refer to OCSC's cover letter accompanying this response for more information in this regard. No changes arising from the proposed revisions impact the Road Safety Audit prepared and submitted with the application.

The promotion of cars around the park is seen as a negative for same and the objective to encourage sustainable and active modes of travel. The provision of excessive road infrastructure for cars surrounding the park would also detract from its attractiveness as a usable open space and the overall quality of the environment.

The first phase of the pocket park proposed as part of this application has been designed to create a self-contained attractive and usable space. Áit Urbanism + Landscape has re-examined the pocket park design and incorporate additional active play features including circular seesaw, cross scales and balance beams as illustrates in Figure 2 below.



DR-300 Further Information Submission 01/02/2023

Figure 1 Previously Submitted Landscape Plan (FI Stage)










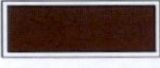

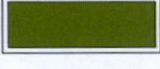
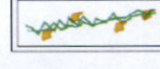



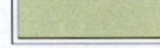
DR-300 Further Information Clarification Submission April 2023

Figure 2 Proposed Landscape Plan

We note that this proposal was presented and discussed with Laurence Collieran of SDCC Public Realm Section on 13 April 2023 with Ait Urbanism + Landscape, prior to making this submission.

The planting schedule provides a range of biodiverse planting including the following native and non-native species:

Soft Landscape

	<p>Semi-mature & Extra Heavy Standard tree planting</p> <p>Bc <i>Betula costata</i>, 2 x tr. / wrb / 30-35cmg. Gt <i>Gleditsia triacanthos</i>, 2 x tr. / wrb / 30-35cmg. Qr <i>Quercus robur</i>, 2 x tr. / wrb / 30-35cmg. Ps <i>Pinus sylvestris</i>, 2 x tr. / wrb / 30-35cmg.</p> <p>Ac <i>Acer campestre</i>, 2 x tr. / wrb / 18-20cmg. Cc <i>Corylus colurna</i>, 2 x tr. / wrb / 18-20cmg. Bp <i>Betula pendula</i>, 2 x tr. / wrb / 18-20cmg. Bpu <i>Betula pubescens</i> 2 x tr. / wrb / 18-20cmg. Pa <i>Prunus avium</i>, 2 x tr. / wrb / 18-20cmg. Qr <i>Quercus robur</i>, 2 x tr. / wrb / 18-20cmg. Tc <i>Tilia cordata</i> 'Greenspire', 2 x tr. / wrb / 16-18cmg.</p>	<p>Existing tree planting</p>  <p>Existing trees to be retained. Refer to Arborist's report for details.</p> <p>Existing trees to be removed. Refer to Arborist's report for details.</p>	
	<p>Small trees / specimen shrubs</p> <p>Al <i>Amelanchier lamarckii</i>, multi-stem / 14 x tr. / wrb / 2.5-3m ht. Cm <i>Craetagus mongyna</i>, multi stem, min. 5 breaks, 2 x tr., wrb, 2.0-2.5m h., 1.5m s. Mk <i>Magnolia kobus</i>, multi-stem / 9 x tr. / wrb / 2.5-3m ht. Ma <i>Malus</i> 'Winter Gold' multi stem, min. 5 breaks / 2 x tr. / wrb/ 2.0-2.5m h., 1.5m s. Pr <i>Prunus serrula</i> 'Branklyn', multi-stem / 13 x tr. / wrb / 2.5-3m ht.</p>		
	<p>Ornamental Grasses/Perennials Mix A See accompanying Landscape Report for details.</p>		<p>Native Hedging See accompanying Landscape Report for details.</p>
	<p>Ornamental Grasses/Perennials Mix B See accompanying Landscape Report for details.</p>		<p>Clipped Evergreen Hedging - <i>Ilex crenata</i> / <i>Ilex</i> 'Blue Princess' See accompanying Landscape Report for details.</p>
	<p>Rain Garden Planting Mix See accompanying Landscape Report for details.</p>		<p>Clipped Evergreen Hedging - <i>Buxus sempervirens</i> / <i>Prunus lusitanica</i> See accompanying Landscape Report for details.</p>
	<p>Shade Tolerant Mix See accompanying Landscape Report for details.</p>		<p>Climber Planting See accompanying Landscape Report for details.</p>
	<p>Front Garden Mix See accompanying Landscape Report for details.</p>		<p>Bulb Planting See accompanying Landscape Report for details.</p>
	<p>Meadow Mix See accompanying Landscape Report for details.</p>		<p>Low Sward Meadow See accompanying Landscape Report for details.</p>

Abbreviations:

- xtr. number of transplants in nursery
- h. height
- s. spread
- wrb wire root-balled
- cmg girth of tree in centimeters measured 1m above ground
- 2ltr cg plants supplied in 2 litre volume containers

Figure 3- Examples of Proposed Biodiverse Planting

We trust that the material provided in respect of Item No. 2b addresses the issue to the satisfaction of the Planning Authority.

3.0 Further Information Response to Item No. 3

Item 3

“Transitional Care Facility Use

The applicant has not fully addressed all of the items previously requested. The applicant is requested to provide more detailed estimated figures and movements in relation to the following:

- A. The profile of patients.
- B. Likely visitor numbers, based on known figures from similar facilities
- C. The specific service requirements of the dementia care facility, including number of dedicated staff, estimated visitor numbers and the requirements of patients for access to amenities outside the immediate development.
- D. Clear estimated figures for the number of patients utilising the mobile diagnostic facilities, the type of diagnostic facilities that will be provided (in-premises or parked outside) and hours of operation.”

Applicant’s Response:

Overview

In response to Item 3, we note that this type of transitional care facility is required by patients before or after receiving surgery and/or treatments for accidents or major illnesses in an acute hospital setting. It is often necessary therefore after a period in hospital for patients to spend a further period of recovery in a transitional facility before returning home or to another healthcare facility.

In addition to the above, the transitional care facility can also provide additional support to acute hospitals on a case-by-case basis to free up beds in step-down services, if required. We emphasise the close relationship Beaumont Lodge (The Applicant’s operational transitional care facility in north Dublin) has with hospitals in the Greater Dublin Area including Beaumont Hospital. The subject proposal will operate under the same principle providing support to acute hospitals including Tallaght Hospital, St James’, St. Vincent’s, and James Connolly Hospital, as required.

A recent press article in the Irish Independent on 29 March 2023 quoted the HSE’s Chief Executive Officer Bernard Gloster by stating:

*“No patient would be on a hospital trolley today if the hundreds of people, who no longer need acute care and are occupying a bed **were given a suitable step-down transfer**, the new head of the HSE said today....*

*The maths are easy,” he said, acknowledging that the **delayed transfers for patients who no longer need to be in hospital can have complex issues.**”*

The proposed facility will therefore provide short term transitional care to patients of all ages, freeing up much needed beds in acute hospitals. We refer to the response to Item no. 3a, 3b and 3c below for further information.

Item 3a

“A. The profile of patients.”

Applicant’s Response

In response to Item 3a, we note that the TCF can facilitate a maximum of 131 patients. The general occupancy is expected to be approximately 80-85% at any given time accounting for turnover of patients to and from acute settings, nursing home, other facility or dwelling.

The percentage breakdown of patients at the proposed TCF is set out as follows:

- 103 nos/79% (rehabilitating patients); and
- 28 nos/21% (dementia patients)

We refer to Figure 4 and the number of patients admitted in February 2023 at the Beaumont Lodge Facility near Beaumont Hospital. Patients’ age profile is not confined to over 65 years of age but includes patients as young as 20 years to 100 years, reflecting the diverse nature and care provided within the bespoke healthcare facility.

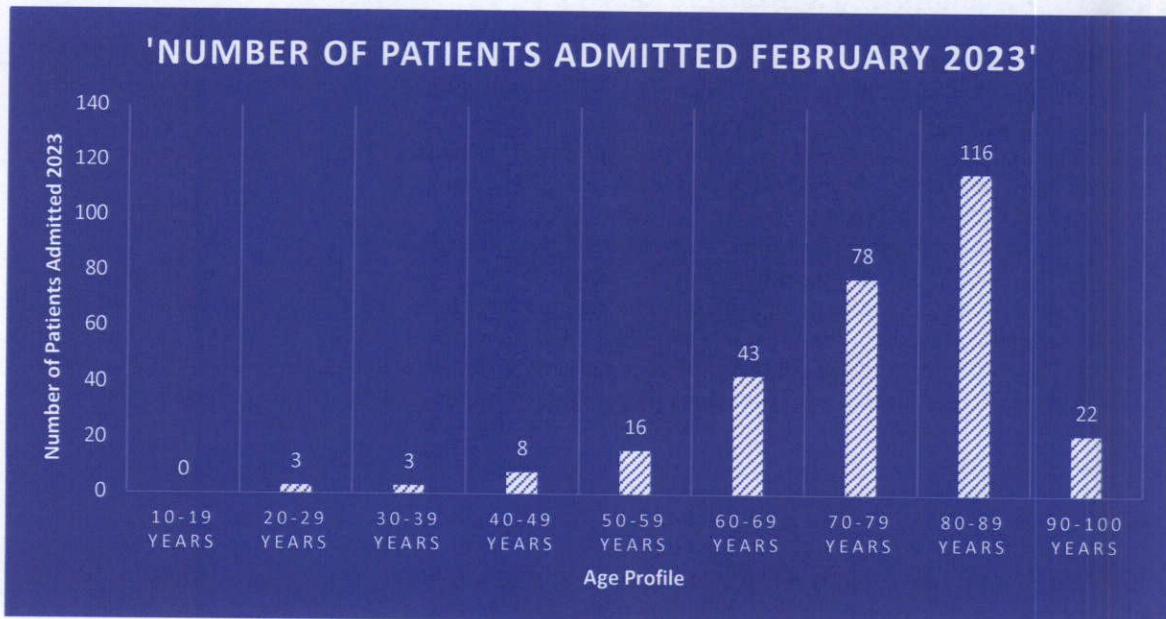


Figure 4 – Number of Patients admitted 2023 – Beaumont TCF

The following characteristics are typical of prospective patients at the TCF:

1. Patients who no longer need acute hospitalisation and would benefit from a reablement programme. These patients receive extensive allied health input to optimise their level of functioning. They and their families are supported to return home with a support package if required.
2. Patients with approved home care packages and are waiting for services to be put in place or require home adjustments and have funding approval of same from the community or from their discharging facility.
3. Patients who are medically ready to go home from the acute setting and have a definitive discharge destination but need short term convalescence and reablement.
4. Patients that require recuperation, reablement, reconditioning and post-operative care and recovery after surgery.
5. Patients with Vac or other complex dressings.
6. Patients requiring IV antibiotics - if an acute hospital needs to discharge patients on the Outpatient Parenteral Antimicrobial Therapy (OPAT) service, the TCF can accommodate this cohort of patients and ensure their safe discharge into the community. 24hrs - 48hrs advance notice is required to source the medication once the patient has been assessed and deemed suitable for admission. Loose medications from any hospitals or patients is prohibited - an electronic system for medication management is used for all medications.
7. Patients who are non-weight bearing awaiting surgery, provided they have a definitive surgical date and a discharge destination.
8. Palliative patients requiring end-of-life care.
9. Patients with dementia.

We note the average length of stay at a typical Transition Care Facility is approximately 40 days, based on the Applicant's Beaumont Lodge facility. These patients will be transitioned home or to another facility once they are rehabilitated and back to their baseline, where possible. Patients are either relocated to the referring or acute hospital setting, nursing home or original place of residence depending on the level of step-up or step-down care required.

The proposed TCF is not a long term care facility for dementia patients. However, dementia patients can be cared for in the short term pending the identification of their long term facility such as a nursing home or similar facility.

Item 3b

“B. Likely visitor numbers, based on known figures from similar facilities.”

Applicant’s Response

In response to Item 3b, we note that the information surrounding likely visitor number is derived from the Applicant’s operational Transitional Care Facility at Beaumont, Co. Dublin.

Visiting will predominantly take place during the weekend period. Approximately c. 2 visitors per patient enter the premises during weekend visiting hours - Friday evening, Saturday and Sunday (over an approximate 8 hour period Sat/Sun).

As noted above, visiting will generally occur in evenings and will not coincide with peak traffic periods. It is important to note that visitors normally travel with another visitor, therefore car sharing and multi-occupant vehicle trips will reduce the number of overall vehicle trips per patient. In a given 8 hour visiting period during the weekend, this equates to an average of 16 visitors per hour.

We reiterate that not all visitors are motorists and the vast majority will travel on foot, bike, bus and luas given the array of transport options available in and around the Cookstown area.

Considering the accessibility of the site which will reduce the numbers seeking to travel by car combined with the aforementioned expectation of higher than normal occupancy rates, the actual demand for car parking is expected to be less than 10 vehicles in a given hour.

In car parking visitor terms, the TCF will operate in the same way as a traditional nursing home. A flexible arrangement is proposed to maximise the efficient use of parking spaces and allow some dual usage of visitor spaces during overnight periods where staff requirements will be increased due to the anti-social nature of the shift times but when there is no demand from visitors.

We refer to Section 1 above to CFI Item No. 1b for more information in this regard.

Item 3c

“C. The specific service requirements of the dementia care facility, including number of dedicated staff, estimated visitor numbers and the requirements of patients for access to amenities outside the immediate development.”

Applicant’s Response

In response to Item 3c, we note that Dementia Care patients are those ‘in transit’ to long term facilities. The number of staff per patient with dementia are included within the general numbers set out above (55 staff during each day shift and 20 staff at night) and fully in line with HSE requirements.

The number of visitors per patient with dementia is similar to all other patients at approximately 2 no. visitors over the weekend period.

Having regard to the Beaumont Lodge Facility, dementia patient requirements for services outside the facility is low. The following services are provided within the proposed transitional care facility:

1. Physiotherapy;
2. Speech and Language Therapy;
3. Occupational Therapy;
4. Pathology / Phlebotomy;
5. Social Worker Services;
6. Medication/Dispensary;
7. Activities Programmes;
8. Chaplaincy;
9. Chiropody and Hairdressing Services;
10. Laundry; and
11. Transport services to and from the acute hospital setting in case of emergency.

Item 3d

“D. Clear estimated figures for the number of patients utilising the mobile diagnostic facilities, the type of diagnostic facilities that will be provided (in-premises or parked outside) and hours of operation.”

Applicant's Response

We confirm that the mobile diagnostic element of the TCF has been removed under this CFI Response. No changes will occur to the floor plan or elevation drawings as a result of this amendment.

We trust the above response to Item no. 3 addresses the issue to the satisfaction of the Planning Authority.

4.0 Further Information Response to Item No. 4

Item 4

“Green Space Factor

The applicant has not achieved the required Green Space Factor (GSF) at the site of 0.5. The applicant shall engage directly with the Public Realm Section and provide a revised GSF calculation detailing how they have achieved the appropriate the minimum GSF scoring established by their land use zoning. Developers can improve their GSF score by retaining existing landscape features and incorporating new landscape features and GI interventions. Layering GI interventions increases the score. Completed GSF worksheets should be submitted to SDCC with the Green Infrastructure Plan and Landscape Plan for a proposed development. Additional/amendments SuDS measures may be included in response to this item.”

Applicant Response:

In response to Item No. 4, we refer to the accompanying cover letter and updated landscape report provided by Áit Landscape and Urbanism.

We note that Áit Urbanism + Landscape met with Laurence Collieran SDCC Public Realm Section on the 13 April 2023 to discuss landscape proposals including green factor scoring (GFS). Additional habitat creation and SuDS measures were discussed and are implemented into the revised design for the benefit of improving the green infrastructure and biodiversity offering on site. These measures are discussed further in the section below.

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. 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.

We note the existing site condition consists of extensive hard standing, impermeable concrete and asphalt and low-quality poplar trees on the perimeter.

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.

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.

Several SuDS measures have been implemented by the Applicant including the following:

- Green Roofs;
- Swales;
- Rain gardens;
- Perennial planting;
- New tree and shrub planting;
- Grass lawn; and
- Permeable paving

Following discussions with Laurence Colleran of SDCC, the CFI submission now includes the following additional measures:

- Rain gardens within the internal courtyard and to the east of the TCF;
- Additional swale provided to the eastern side of the verge parallel with the north south internal access road;
- Pollinator friendly beds, verges and landscape strips;
- Installation of bat boxes and swift bird boxes throughout; and
- Additional habitat creation for invertebrates and bees at roof level.

Bat and bird boxes will be provided to the specification of the Consultant Ecologist and Landscape Architect, post planning. We invite a suitably worded condition relating to same. Please refer to the cover letter submitted as part of this response which includes the additional SuDS measures and OCSC Drawing B981-OCSC-XX-XX-DR-C-0505 for more information.

We refer to the completed green factor worksheets enclosed in Áit's updated landscape report accompanying this response for more information.

We understand the GFS allows for some layering of scoring whereby SuDS measures such as a swale can be counted with layered planting. The Applicant has made every meaningful effort to improve the GFS. As such, the above measures increase the GFS from 0.23 to 0.32.

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.

We also note that should permission be granted and implemented, further contributions to Green Infrastructure through the payment of the Development Contribution levies related to landscape/open space provisions will be made by the Applicant. Should the Planning Authority be minded to grant permission, a condition could be applied in respect of green infrastructure.

We trust that the material provided in relation to Item No. 4 addresses the issue to the satisfaction of the Planning Authority.

5.0 Conclusion

Item No. 1

We reiterate that the SDCC Development Plan which came into effect in August 2022 in certain instances relating to building height supersedes the Tallaght LAP (July 2020). The 5 storey proposal is just one storey above the LAP standards at 4 storeys for this particular site. When considering the site's redevelopment potential in line with the regeneration and compact city objectives of the LAP, County Plan and Sustainable and Compact Settlements Guidelines for Planning Authorities Consultation Paper 2023, the marginal height increase of one storey is not detrimental to the policies and objectives specified for Cookstown but will ensure the financial viability of this 131 bed facility.

The proposal fulfils the several objectives outlined in the Sláintecare Implementation and Action Strategy 2021-2023 that seek to:

- Create capacity for acute hospital sites and reduce/eliminate outlier boarding (trolleys);
- Drive down waiting lists (outpatient, inpatient and day case);
- Reduce cancellations, and
- Reduce acute hospital footfall.

The proposed TCF contributes to the delivery of the Government's healthcare policy. Any further delays to this application would directly impact and inhibit the delivery of the Sláintecare Action Strategy.

Having regard to Sláintecaire/HSE requirements and the symbiotic nature of the proposal with acute hospitals in the Greater Dublin Area including Tallaght University Hospital, St James', St. Vincent's, and James Connolly Hospital, combined with the excellent transport links near the subject site, the proposed development at Cookstown, is considered the ideal location for such a facility, justifying the slight increase in height and plot ratio.

Item No. 2

In the absence of any definitive timeframe or proposed layout drawings for the permanent upgrade works and Active Travel Plan, the interim design solution proposed under this application will offer notable improvements to both pedestrian and cycle accessibility at the site which are necessary to facilitate its development. The proposed design will not compromise the delivery of the active travel plan in the future.

Set-down bays are considered a requirement for commercial units proposed under future and separate planning applications to eliminate obstruction along the public roads.

The promotion of cars around the park is seen as a negative for same and the objective to encourage sustainable and active modes of travel. The provision of excessive road infrastructure for cars surrounding the park would also detract from its attractiveness as a usable open space and the overall quality of the environment. Parking provision for 17 no. spaces serving the TCF and 31 no. spaces serving the adjoining multi-use building (subject of a separate application) is a demand management measure introduced by the design team based on the national policy to reduce reliance on car parking and support sustainable travel.

The shared pedestrian/cyclist connection has been incorporated into the landscape design of the pocket park opening lands up to the south, should they be developed in the future.

In response to the Planning Authority's concerns relating to the pocket park, a more detailed masterplan has been prepared by Áit Urbanism + Landscape and accompanies this response. Additional active play features including circular seesaw, cross scales and balance beams have been introduced to the area of the pocket park that will be delivered under this application.

Item No.3

A detailed description of the patient profile, staff and visitor numbers is provided in Section 3.0 above. The information contained in this response is directly informed by the Applicant's transitional care facility at Beaumont Lodge (fully operational) and Clondalkin (under construction).

The bespoke nature of this healthcare proposal, as a relatively new model of step-up/step-down care, should therefore be considered on its own merits. We ask that some degree of flexibility and understanding is afforded by the Planning Authority in their assessment of the proposal.

Item No. 4

We note that Áit Urbanism + Landscape met with Laurence Colleran SDCC Public Realm Section on the 13 April 2023 to discuss landscape proposals including green factor scoring (GFS). We understand the GFS allows for some layering of scoring whereby SuDS measures such as a swale can be counted with layered planting. The following additional measures were discussed and are implemented into the revised design for the benefit of improving the green infrastructure and biodiversity offering including the GFS.

The CFI submission includes the following additional measures:

- Rain gardens within the internal courtyard and to the east of the TCF;
- Additional swale provided to the eastern side of the verge parallel with the north south internal access road;
- Pollinator friendly beds, verges and landscape strips;
- Installation of bat boxes and swift bird boxes throughout; and
- Additional habitat creation for invertebrates and bees at roof level.

Bat and bird boxes will be provided to the specification of the Consultant Ecologist, post planning. We invite a suitably worded condition relating to same.

We refer to OCSC Drawing B981-OCSC-XX-XX-DR-C-0505 and cover letter for more information.

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.

The Applicant has made every meaningful effort to improve the GFS. As such, the above measures increase the GFS from 0.23 to 0.32.

We also note that should permission be granted and implemented, further contributions to Green Infrastructure through the payment of the Development Contribution related to landscape/open space provisions will be made by the Applicant. Should the Planning Authority be minded to grant permission, a condition could be applied in respect of green infrastructure.

Conclusion

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

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 refuse permission 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.

