

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/bioretenion 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 Clar. of AI

Report Date: 15/05/2023

Recommendation: REFUSAL

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:

1. The applicant has increased the GSF score for the site from 0.23 to 0.32 which is welcomed however this still falls short of the 0.5 required for a REGEN zoned site.
2. There appears to be doubling up of open space provision between the two developments (**LRDOP001/23 & SD22A/0361**) and when this is taken into account it's likely the applicant has not provided the required public open space provision for this development as required under Section 2.7.2 of the Tallaght Town Centre LAP "A minimum of 10% of the gross site area shall be dedicated for use as public open space within any proposal for development which shall be of a high quality and integrated into an overall interconnected network of public open space and green routes." Clarity must be provided by the applicant as to how the public open space requirements for both developments have been met.
3. The applicant has proposed a large attenuation tank as part of the surface drainage scheme for this proposed development. This is not acceptable to the public realm section and is not compliant with SDCC Guidance [Sustainable Drainage Systems - SDCC](#) or Department of Housing Best Practice Guidance Document [409cd225-5afc-44b8-a7b1-bb595632a904.pdf \(www.gov.ie\)](#). The applicant shall provide additional above ground attenuation incorporating natural solutions. The applicant has failed to provide relevant details in terms of the SUDS details proposed as part of the surface water drainage scheme including the SUDS Tree Pits, swales and green roofs.

PUBLIC REALM COMMENTS

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

Green Space Factor (GSF)

Through the additional SUDS interventions, the applicant has increased the Green Space Factor score for the site from 0.23 to 0.32, however this score falls short of the required 0.5 for a RENGEM site, a shortfall of 0.18 still persists. The applicant has proposed measures including the installation of bat boxes, swift boxes and creating an area for solidarity bees at roof level however these measures are not deemed sufficient to make up this shortfall. The applicant is therefore not in compliance with Objective 4 of the CDP and the Public Realm Section therefore recommends REFUSAL on this basis.

GI5 Objective 4: To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).

Open Space Provision

In terms of open space provision, the applicant is proposing only to deliver 1,286 sqm of the required pocket park as required under the Tallaght Town Centre LAP. This 1,286 sqm represents 17% of the total site area and meets the minimum public open space standard of 10% for REGEN zoned lands. However Public Realm have concerns as this pocket park is also providing the public open space requirement of the adjoining residential mixed-use scheme of 123 no. build to sell apartment units (**Planning Ref No. LRDOP001/23**). There appears to be doubling up of open space provision between the two developments (**LRDOP001/23 & SD22A/0361**) and when this is taken into account it's likely the applicant has not provided the required public open space provision for this development as required under Section 2.7.2 of the Tallaght Town Centre LAP *"A minimum of 10% of the gross site area shall be dedicated for use as public open space within any proposal for development which shall be of a high quality and integrated into an overall interconnected network of public open space and green routes."* Clarity must be provided by the applicant as to how the public open space requirements for both developments have been met.

SuDS

The applicant is still proposing an attenuation tank as part of the surface drainage scheme for the development. This is not acceptable to the public realm section and is not compliant with SDCC Guidance [Sustainable Drainage Systems - SDCC](#) or Department of Housing Best Practice Guidance Document [409cd225-5afc-44b8-a7b1-bb595632a904.pdf \(www.gov.ie\)](#). Underground tanks are not

accepted for surface water attenuation because they are not a natural SuDS system as required by SDCC. The applicant should consider using additional swales with check dams closer to the source of surface water occurring instead of pipe networks. As per **COS5 Objective 12 pf the CDP 2022-2028** proposed SuDS measures are only accepted as an element of public open space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and biodiversity value. SUDS measures are only accepted as an element of public opens space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and biodiversity function. If the attenuation measures don't provide all the elements of natural SuDS as set out above then the provision is not considered to be Public Open space and the area underlain by these tanks will not form part of the open calculation for the development

The applicant shall submit a revised drawing in plan and cross-sectional view showing additional SuDS such as:

- Green / Blue Roofs
- Swales
- Green areas
- Permeable Paving
- Tree Pits
- Pond/s
- Other such SuDS

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 that the Development be REFUSED.

However, if it is proposed to grant permission then the following conditions should be applied.

1. Landscape Plans

Prior to the submission of the Commencement Notice within the meaning of Part II of the Building Control Regulations 1997 and prior to the commencement of any works on site, the applicant, owner or developer shall have lodged with the Planning Authority for agreement by Public Realm:

- a) A fully detailed landscape plan, to be agreed with Public Realm, with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations in addition the applicant is requested to submit a fully detailed Planting Plan for the development.

b) Demonstrate how additional natural SUDS features can be incorporated into the design in order to remove the requirement for attenuation tanks within the Development.

REASON: In the interests of biodiversity, amenity, compliance with Development Plan Policy, the provision, establishment and maintenance of a reasonable standard of landscape and the proper planning and sustainable development of the area in accordance with the policies and objectives of the County Development Plan 2022-2028.

2. Public Open Space Provision

As required under Section 2.7.2 of the Tallaght Town Centre LAP; *“A minimum of 10% of the gross site area shall be dedicated for use as public open space within any proposal for development which shall be of a high quality and integrated into an overall interconnected network of public open space and green routes.”* The applicant is to confirm that the minimum 10% Public Open Space requirement as per the LAP has been met for this development when the public open space requirement for the adjoining development has been deducted from the open space calculation for the proposed pocket park which totals 1,286 sqm which is also included as part of the open space calculations for this development. Clarity must be provided by the applicant as to how the public open space requirement for both developments have been met.

Reason: In accordance with the proper planning and sustainable development of the area.

3. SUDS

Provide additional natural SUDS features as part of 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.

As per **COS5 Objective 12 of the CDP 2022-2028** proposed SuDS measures are only accepted as an element of public open space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and biodiversity value. SUDS measures are only accepted as an element of public open space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and biodiversity function. If the attenuation measures don't provide all the elements of natural SuDS as set out above then the provision is not considered to be Public Open space and the area underlain by these tanks will not form part of the open calculation for the development

The applicant shall submit a revised drawing in plan and cross-sectional view showing additional SuDS such as:

- Green / Blue Roofs
- Swales
- Green areas
- Permeable Paving
- Tree Pits
- Pond/s

The applicant is required to submit design details and cross sectional views clearly showing how the proposed SuDS features for the development will work and what the attenuation volume of each feature will be. Proposed swales should include check dams in order to increase attenuation volume provided. Design details are required for the SUDS Tree Pits, swales and green roofs proposed. The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022'.

REASON: To prevent the increased risk of flooding by ensuring the provision of a satisfactory means of surface water disposal is incorporated into the design and the build and that the principles of sustainable drainage are incorporated into this proposal and maintained for the lifetime of the proposal, in accordance with the policies and objectives of the County Development Plan 2022-2028.

4. SUDS Management Plan

A comprehensive SUDS Management Plan shall be submitted to demonstrate that the proposed SUDS features are compliant with Council policies and are designed in line with the Councils Sustainable Drainage Guidance. This shall include the removal of all underground attenuation from Public Open Space Areas. A maintenance plan shall also be included as a demonstration of how the system will function following implementation. Additional natural SUDS features shall be incorporated into the proposed drainage system for the development such as rain gardens, detention basins, filter drains, swales etc.

REASON: To prevent the increased risk of flooding by ensuring the provision of a satisfactory means of surface water disposal is incorporated into the design and the build and that the principles of sustainable drainage are incorporated into this proposal and maintained for the lifetime of the proposal, in accordance with the policies and objectives of the County Development Plan 2022-2028.

Prepared By: Oisín Egan
Executive Parks Superintendent

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