

Statement of Consistency & Planning Report

Proposed SHD – Planning Application

**Lands at Broomhill Road,
Tallaght, Dublin 24,
D24 XA52 and Unit 51 Broomhill Road,
Tallaght, Dublin 24, D24E124**

**On behalf of
Garyaron Homes Ltd.**

May 2022



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Table of Figures.....	iii
1 EXECUTIVE SUMMARY	1
1.1 The Subject Site	1
1.2 Subject Proposal	1
1.3 Planning History.....	2
1.4 Planning Context.....	2
2 INTRODUCTION.....	3
2.1 Context for the lodgement of this Planning Application	3
2.2 Hard and Digital Copies	3
3 Applicant and Design Team	4
4 SITE DESCRIPTION	6
4.1 Subject Site	6
4.2 Surrounding Area.....	7
4.3 Access to Public Transport.....	8
5 PLANNING HISTORY	10
5.2 Surrounding Sites.....	10
5.2.1 Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate Reg. Ref. ABP – 308398-20	10
5.2.2 Former Gallaghers Cigarette Factory Junction of Airton Road and Greenhills Road Reg. Ref. ABP – 306705-20.....	12
5.2.5 Glen Abbey Complex, Belgard Road, Cookstown Industrial Estate Reg. Ref. ABP – 309916 - 21 ..	13
5.2.6 Unit, 5A-C, Second Avenue, Cookstown Industrial Estate Reg. Ref. ABP – 303803 -19.....	13
5.2.7 Planning History Conclusion	13
6 SECTION 247 PRE – PLANNING	14
6.1 Pre-Planning.....	14
7 DESCRIPTION OF PROPOSED DEVELOPMENT	16
7.1 Proposed Development	16
7.2 Detailed Description	17
7.2.1 Proposed Demolition.....	17
7.2.2 Public Open Space	17
7.2.3 Residential Element.....	19
7.2.4 Dual Aspect	19
7.2.5 Residential Density	20
7.2.6 Communal Facilities	20
7.2.7 Childcare Provision	20
7.2.8 Car and Bicycle Parking.....	20
7.2.9 Part V Provision	21
8 RELATIONSHIP TO SURROUNDING DEVELOPMENTS.....	22
8.1 Description of Surrounding Development	22
8.2 Relationship to Surrounding Development	23
8.3 Conclusion	24
9 STATEMENT OF CONSISTENCY - STRATEGIC PLANNING CONTEXT.....	25
9.1 Introduction.....	25
9.2 Project Ireland 2040 – National Planning Framework	25
9.3 Housing for All: A new Housing Plan for Ireland.....	27
9.4 Rebuilding Ireland: Action Plan for Housing and Homelessness 2016	28
9.5 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031.....	29

9.6	Design Manual for Urban Roads and Streets 2019	31
9.7	Smarter Travel - A New Transport Policy for Ireland 2009-2020	32
9.8	Transport Strategy for the Greater Dublin Area 2016-2035	33
9.9	Sustainable Residential Development in Urban Areas (2009) / Urban Design Manual (2009).....	34
9.10	Delivering Homes Sustaining Communities (2007).....	38
9.11	Guidelines for Planning Authorities on Childcare Facilities (2001).....	39
9.12	The Planning System and Flood Risk Management (2009).....	40
9.13	Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009) 41	
9.14	Design Standards for New Apartments (2020)	42
9.15	Urban Development and Building Height Guidelines (2018).....	48
9.16	Design Manual for Urban Roads and Streets (DMURS) (2013).....	53
9.17	Conclusion	53
10	Local Planning Context.....	54
10.1	South Dublin County Development Plan 2016-2022	54
10.1.1	<i>Zoning</i>	54
10.1.2	<i>REGEN Policies and Objectives</i>	55
10.2	SDCC Development Guidance – Regen Zones.....	55
10.3	Height	60
10.4	Density	60
10.5	Housing Mix	61
10.6	Plot Ratio	61
10.7	Transport	62
10.8	Aviation.....	62
10.9	Open Space	63
10.10	Tallaght Town Centre Local Area Plan 2020	64
10.11	South Dublin County Council Draft Development Plan 2022-2028	67
11	Conclusion	72

Table of Figures

Figure 3-1 Aerial map with approx. site outlined in red [Source: Google Maps, shapes added via Adobe Illustrator] Red line update.....	Error! Bookmark not defined.
Figure 3-2 Site Context	Error! Bookmark not defined.
Figure 3-3 Aerial map of subject site and distances from showing proximity to local facilities and amenities [Source: Google Maps, shapes added via Adobe Illustrator]	Error! Bookmark not defined.
Figure 4-1 Baker’s Corner Public House and Off-Licence	Error! Bookmark not defined.
Figure 4-2 The Forge Building	Error! Bookmark not defined.
Figure 4-3 Elevation of Granted Development [Source: DLRCC’s Online Planning Enquiry Service] Error! Bookmark not defined.	
Figure 7-1 Proposed Site Layout Plan [Source: Proposed Site Plan prepared by JMA]	17
Figure 7-2 CGI of Proposed Student Communal Facilities [Source: BIGlolly].....	Error! Bookmark not defined.
Figure 7-3 CGI of Rochestown Avenue Elevation [Source: BIGlolly].....	Error! Bookmark not defined.
Figure 7-4 CGI of Proposed Aerial View [Source: BIGlolly]	Error! Bookmark not defined.
Figure 8-1 Surrounding Area - Images of developments outside the site - Source: Extract from JMA Design Statement	Error! Bookmark not defined.

Figure 8-2 Setback distances to maintain residential amenity and privacy	Error! Bookmark not defined.
Figure 9-1 Dublin City and Suburbs [Source: RSES for Eastern and Midland Regional Assembly, shape added via Adobe Illustrator].....	30
Figure 10-1 DLRCC Zoning Map with approx. site outlined in red [Source: DLRCC Zoning Map 7]	Error! Bookmark not defined.
Figure 10-2 Proposed Spatial Layout	Error! Bookmark not defined.
Figure 10-3 Proposed built form showing green roofs	Error! Bookmark not defined.
Figure 10-4 Proposed Landscape Plan	Error! Bookmark not defined.
Figure 10-5 - Draft DLR Development Plan Zoning Map 2022-2028.....	Error! Bookmark not defined.

Table of Tables

Table 8-1 Compliance with Urban Design Manual.....	36
Table 8-2 Development Management Criteria.....	50
Table 9-1 Evaluation of the proposed development in terms of relevant county plan development management policies	Error! Bookmark not defined.

1 EXECUTIVE SUMMARY

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin, have prepared this Statement of Consistency and Planning Report on behalf of **Garyaron Homes Ltd.**, Unit H2, Merrywell Business Park, Lower Ballymount Road, Dublin 12, for a Strategic Housing Development proposal on lands at Broomhill Road, Tallaght, Dublin 24. For clarity, the site is located within the administrative boundary of South Dublin County Council. A summary of the main points of this report are set out below.

1.1 The Subject Site

- The subject site extends to approx. 1.4 ha and is located in Broomhill Industrial Estate, northeast of Tallaght Town Centre and less than 100m north of Airton Road. The site currently includes a vacant industrial unit, car parking and storage containers.
- The site is bounded by Broomhill Terrace to the north, Broomhill Road to the west and Zoetis animal health company to the south. A range of retail, office, logistic and warehouse uses are located to the east.
- The site has excellent connectivity to Third Level Education Institutes including being within a 10-minute walk of TU Dublin, Tallaght Campus and directly accessible to a range of local amenities including schools and local parks.
- The site is conveniently located in close proximity to the Tallaght Town Centre and a number of local facilities and amenities such as health care, supermarkets, gyms and sports clubs.
- The site is located in an evolving area with a number of residential developments recently permitted in the locality.

1.2 Subject Proposal

The proposed development will consist of a residential and mixed-use scheme on a site of c.1.4ha including the following:

- A total of 242 no. residential apartment units are proposed, which will be broken down as 96no. 1-bed units, 141no. 2-bed units and 5no. 3-bed units.
- The apartments will be provided in 5 no. blocks extending from 4 to 7 storeys in height. Heights are concentrated along the boundary with Broomhill Road to the west in Blocks B/C and Block D in a corner treatment that provides a landmark element. Car parking is provided at surface level along the southern and eastern boundaries to provide a separation between the subject proposal and adjoining properties and to mitigate any height impacts where possible.
- The proposed residential density is 172 units per ha. It is considered the site can accommodate this density given the proximity to public transport i.e. Luas stations and bus services, local amenities, and accessibility to Tallaght Town Centre.
- Access to extensive public open space will be provided in the form of a central courtyard, directly accessible from Broomhill Road to the west of the site via an existing access point, and will include lawn areas, seating and play areas. The open space will be connected via pedestrian and cyclist linkages throughout the site and a key west-east and north-south linkage is proposed. Additional communal open space is provided within the development for residents at ground floor level and at fifth floor level in the form of two separate roof terraces.
- Addressing the access point to the central space, a café will be provided at the ground floor of Block C along with a gym, co-working space and residential support facilities facing into the central courtyard and on to Broomhill Road. The boundary treatment and planting along Broomhill Road on the west side of the site boundary will not be impacted by the subject proposal and will be retained to provide screening and assist with the integration of the subject proposal into the existing landscape.
- Block D accommodate a 465sqm Childcare Facility. Appropriate open space, car parking and waste management areas will be provided to support this facility.

- Appropriate levels of car parking will be provided to cater for the proposed residential development. **A ratio of 0.56 spaces per unit is considered appropriate given the site's proximity to public transport and local amenities/services and the proposal's full compliance with bicycle parking requirements.**

1.3 Planning History

- There is a limited planning history at the subject site. Airtion Properties applied for a 4-storey office building and 360sqm creche in 2001 which was refused permission. An earlier 3-storey plus penthouse office building and light industrial development was granted in 2000 but was not built. The application for the existing industrial unit is considered a historical file at this stage.
- There has been a substantial amount of residential development granted within the vicinity of the site. The commencement of construction on these sites is imminent. :
 - 66 & 67 Fourth Avenue, Cookstown – 252 build to rent apartments, with commercial and creche in 2 to 9 storey development.
 - Former Gallagher's Cigarette Factory, Airtion Road – 502 apartments, with retail units and creche ranging from 4 to 8 storeys
 - Site at Corner of Airtion Road and Belgard Road – 328 apartments
 - Belgard House, Belgard Square North – 438 apartment units, 403 student bedspaces, childcare facility and six commercial/retail units
- We note the publication of the Urban Development and Building Heights Guidelines for Planning Authorities and Regional Spatial and Economic Strategy for the Eastern and Midland Region has significantly changed the planning landscape of the site. **This change in context is a key consideration for the density of the current proposal.**

1.4 Planning Context

- The site is zoned Objective 'REGEN – To facilitate enterprise and/or residential led regeneration' which lists Residential use as Permitted in Principle. Furthermore, a Childcare Service, recreational facility (gym) and restaurant/café are both listed as permitted in principle under this zoning.
- The proximity of the site to public transport and local services and amenities means it is therefore opportunely located to provide for a higher residential density and additional height in compliance with national policy mandate.
- The proposal is in accordance with the relevant statutory documents and there is an appropriate planning context for this proposal. Furthermore, the proposed heights and density for this scheme is well founded in the context of national planning policy.
- The residential units proposed are of exceptional quality, with high amenity layouts, communal facilities, connections to public transport and bicycle parking facilities. Careful attention has been given to the integration of the subject proposal into the surrounding area in the design of the scheme.

2 INTRODUCTION

Our Client **Garyaron Homes Ltd.** has instructed **Brock McClure Consultants, 63 York Road, Co. Dublin** to lodge this Strategic Housing Development (SHD) application to An Bord Pleanála.

We wish to highlight from the outset, that the applicant has taken on board all of the feedback from the Planning Authority and An Bord Pleanála to deliver on a proposal that is appropriate to the site and the surrounding context at Broomhill Road.

We note at this point that the subject site is conveniently located at Broomhill Road in Tallaght, in close proximity to high quality public transport, such as the Kingswood and Belgard Luas stops and bus services along Greenhills Road and Belgard Road. The site has the potential to deliver on a sustainable density that is appropriate to both the site and surrounding development.

We ask the Board to consider these points in their review of proposals and we trust that they will view this proposal as a positive move towards the delivery of much needed residential development at an opportunely located site.

This planning report is intended to specify the rationale behind the subject proposal; to identify compliance with relevant statutory documentation; and to provide a detailed description of the proposal for the benefit of An Bord Pleanála.

2.1 Context for the lodgement of this Planning Application

This strategic housing development pre-application request is lodged in accordance with Part 2 Section 4 (1) of the Planning & Development (Housing) and Residential Tenancies Act 2016, which sets out the following:

(1) Subject to subsection (4), during the specified period and notwithstanding anything to the contrary contained in any other provision of the Planning and Development Acts 2000 to 2016—

(a) an application for permission for a strategic housing development shall—

(i) be made to the Board under this section and not to a planning authority, other than an application for permission, the purpose of which is as set out in section 34(3A) of the Act of 2000,

(ii) be so made only where section 6(7)(b) applies or, in the case that a request is made under section 7(1), when the Board has complied with the request pursuant to section 7(2),

(iii) be so made only where the applicant for permission has fulfilled the requirements set out in section 8,

(iv) be in such form and contain such information as is prescribed, and (v) be accompanied by the appropriate fee,

and

(b) a copy of the application, shall be sent by the applicant to the planning authority or authorities in whose area or areas the proposed strategic housing development would be situated.

This planning application is lodged in compliance with the above requirements and particularly those set out in Section 8 of the Planning & Development (Housing) and Residential Tenancies Act 2016.

2.2 Hard and Digital Copies

In addition, we confirm specifically that:

- 2 hard copies and 3 digital copies of all material is now submitted for review by An Bord Pleanála.
- 6 hard copies and 1 digital copy of all material has been issued to the Planning Authority of South Dublin County Council.
- 1 digital copy (as requested) has been sent to Prescribed Bodies listed in the ABP Opinion.

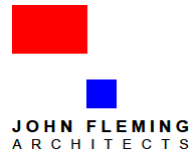
3 Applicant and Design Team

Our client has appointed an experienced design team to prepare a residential planning application, which will be lodged under the Strategic Housing Development process to An Bord Pleanála. The design team comprises:

- Garyaron Homes Ltd. – Applicant
- Brock McClure – Planning & Development Consultants
- John Fleming Architects – Design Architects
- Kavanagh Burke Consulting Engineers – Design Engineers
- Park Hood – Landscape Architects
- Park Hood – Visual Architects and Analysis
- Malachy Walsh and Partners – Ecologists
- Tina Aughney – Bat Consultant
- 3D Design Bureau – Sunlight & Daylight Analysis and Photomontages
- NRB – Traffic and Transport Engineers
- Arborcare – Arboriculture Consultants
- Environmental Design Partnership – Lighting Design and Sustainability Report
- AWN – Construction Management and Waste Management Consultants and Noise Consultants
- O'Dwyer and Jones Design Partnership – Aviation Planning



Planning and Development Consultants



Design Architects



Design Engineers



Landscape and Visual Architects



Arboriculture Consultants



Environmental Design Partnership

M&E Engineers



Ecologists



Sunlight & Daylight and Visuals



Noise and CEMP

Transport Engineering Consultants

[Sources: Logos sourced from Company Reports]

The various inputs from the design team are referenced where relevant within this report. We confirm that the following reports are included herewith to enable An Bord Pleanála to make a comprehensive assessment of the scheme:

- Brock McClure Consultants – Full Suite of Planning Reports and Associated Material
- John Fleming Architects – Design Statement, Housing Quality Statement and Full Set of Architectural Drawings & Schedule
- Kavanagh Burke Consulting Engineers – Drainage Design Report and Drainage Engineering Drawings
- Park Hood – Landscape Design Book and Landscape Masterplan
- Park Hood – Townscape and Visual Impact Assessment,
- 3D Design Bureau - CGI Views and Verified Photomontages
- Malachy Walsh – AA Screening Report, Ecological Impact Assessment Report, EIAR Screening Statement, Section 299B Statement and attached Bat Report by Bat Eco Services
- 3D Design Bureau – Daylight & Sunlight Assessments
- Arborcare– Tree Impact Assessment
- AWN – Construction and Environmental Management Plan and Waste Management and Noise Consultant
- NRB - Traffic and Transport Assessment including Residential Travel Plan
- O'Dwyer and Jones – Aeronautical Assessment

4 SITE DESCRIPTION

4.1 Subject Site

The subject site is located at Lands at Broomhill Road, Broomhill Industrial Estate, Tallaght, Dublin 24 which is identified in the figure below for the purposes of this report.

- The application site consists of a total site area of 1.4ha or 3.6 acres which comprises of vacant industrial buildings (c.4319sqm).
- The site faces onto Broomhill Road to the west and Broomhill Terrace to the North, the site is bounded by industrial and commercial lands to the east and south.

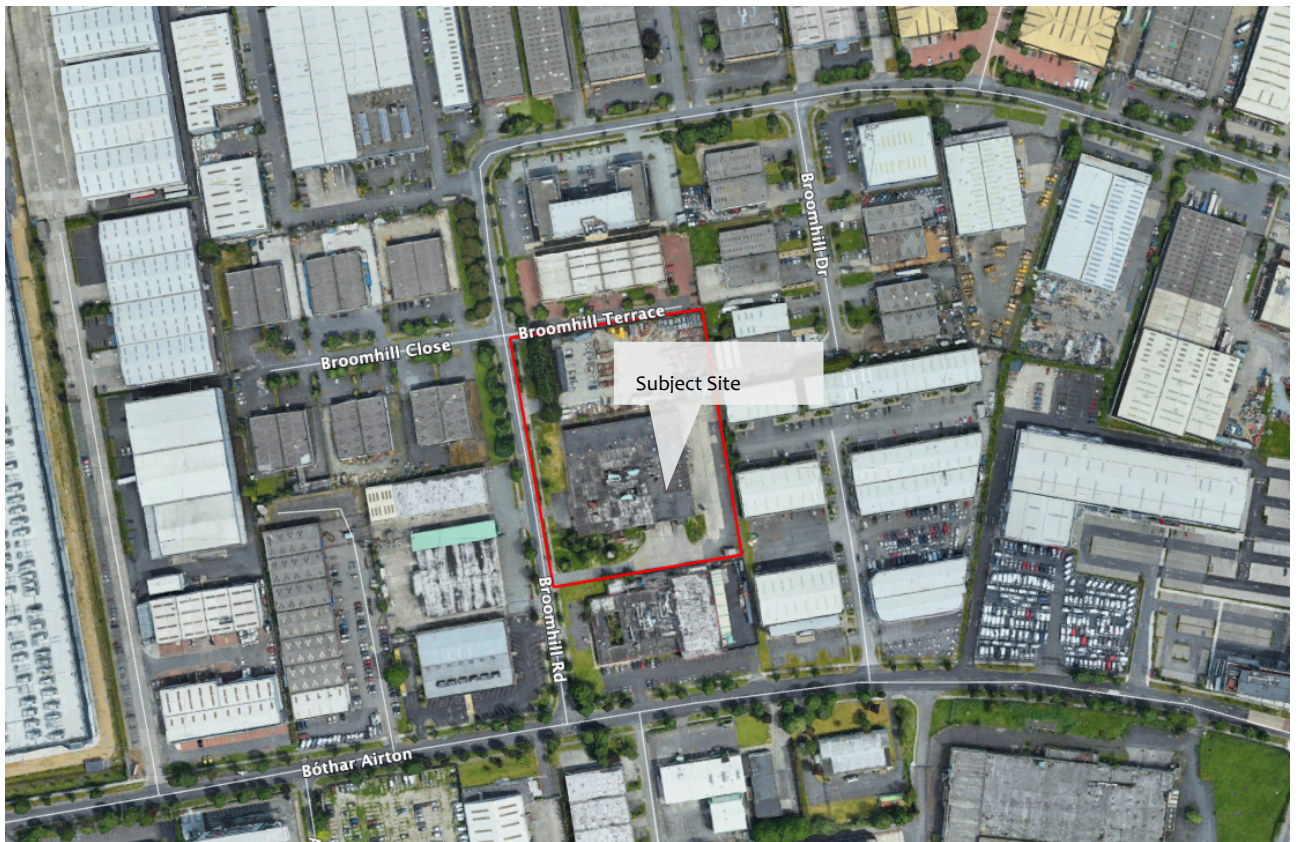


Figure 1 - Aerial view of site boundary

4.2 Surrounding Area

- The site is located within the Broomhill Industrial estate approx. 1km Northeast of Tallaght town Centre and The Square Tallaght/Tallaght shopping Centre.
- Commercial and industrial type uses are present in the immediate surroundings.
- Technical University Dublin (formally The Institute of Technology Tallaght) is located less than 500 m south of the subject site.
- Tallaght hospital is approx. 1km west of the subject site.



Figure 2 - Site Context



Figure 3 – Broomhill Road

4.3 Access to Public Transport

- The subject site is located 1km from Belgard and Kingswood LUAS Stations.
- Bus routes 27 and 76 are approx. 500m walk away from the subject site.
- Bus routes:
 - 27-Clare Hall to Jobstown
 - 76 – Chapolised Towards Tallaght The Square
- Bus stops serving all named routes are within close walking distance of the subject site:
 - Airton Road, stop 2633 (27) located 480m (6min walk) from subject site.
 - Belgard bus stop 2618 (76, 76a) located 800m (9min walk) from subject site.
 - Belgard Retail Park bus stop 2364 (76,76a)
 - Belgard Square North bus stop 5008 (27,54a,65,75,75a, 76a, 77a,175)
 - Tallaght Village stop 4435 (27,54a,65,75,75a,77a,175)
 - Tallaght Blessington road 4436 (27,54a,65,75,75a,77a,175)
 - South Dublin CC bus stop 4647 (27,54a,65,75,75a,76,76a,77a,175)



Figure 4 - Public transport Surrounding the Site

5 PLANNING HISTORY

The following section provides a brief overview of the current planning history for the subject site and surrounding environs.

5.1 Subject Site

There is a limited planning history available for the subject site with the original industrial/office use application for the site considered a historical planning file at this stage. It is unlikely to provide any major indication of the current development parameters for the site. The following is the only planning file available for the site from Council's online resources.

SDCC Reg. Ref. S01A/0887

Applications were made under South Dublin Development plan 2000 to 2008 which is now replaced. Under S01A/0887 in 2001 Airtown properties applied to demolish and erect a 4-storey high 15,000sqm office with a 360sqm creche which was refused permission.

SDCC Reg. Ref. S00A/0558

Under S00A/0558 in 2000 Merrycroft applied for a 3 storey plus penthouse telesales offices and light industrial development over 2 blocks which was granted permission. This was not built.

There is no record of a more recent application for this site.

5.2 Surrounding Sites

There has been a substantial amount of residential development constructed and granted within the vicinity of the site in particular the following Strategic Housing Developments are relevant for the subject site.

5.2.1 Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate Reg. Ref. ABP – 308398-20

This was an application on the 12/10/2020 for the construction of a Strategic housing development located east of the subject site at Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24, the development comprises of the following:

- 252 build to rent apartments in a two to nine storey development, 613sq.m of internal communal amenity space (including a concierge and management facilities, communal gym, flexible meeting rooms, library/co-working space, lounge, cinema/multimedia room and external covered game area); 1792sq.m of external communal amenity space at first and second floor levels; and a 65sq.m external covered communal amenity area at first floor level.
- The development is served by an under-croft carpark accessible from the south-western corner of the site providing a total of 73 parking and 500 bicycle spaces at ground floor level
- 2 commercial units (comprising of a 95sq.m unit accommodating a café/restaurant and a 145sq.m unit accommodating Class 1, 2 and 8 uses as per the Planning and Development Regulations, 2001-2019, as amended) and a 275sq.m crèche, with associated 86sq.m play area, at ground floor level.

In making the decision the board had the following comments regarding the Tallaght Local Area Plan, 2020-2026.

- The Board considered that the proposed development is, apart from the parameters of the plot ratio, housing mix and housing tenure set out in the Tallaght Town Centre Local Area Plan 2020-2026, broadly compliant with the provisions of the Tallaght Town Centre Local Area Plan 2020-2026 and the South Dublin County Development Plan 2016-2022 and would, therefore, be in accordance with the proper planning and sustainable development of the area.
- While the plot ratio is in excess of the LAP standards it is considered appropriate in this instance as the subject proposal complies with the height and built form requirements and would create a high-quality urban environment.

South Dublin County Council and An Bord Pleanála granted permission on the 28/01/2021. The conclusion made by the board included the following conditions and modifications be made to the proposed development.

The development was amended as follows:

- The height of Block B, which fronts onto the Cookstown Road Extension, shall be reduced to a maximum of seven stories. This shall be achieved by the omission of two mid floors in the block.
- The heights of both Block A, which fronts onto Fourth Avenue, and of Block C, which faces south, shall each be reduced to a maximum of six stories. This shall be achieved by the omission of a mid-floor in each block.
- The creche unit at the ground floor of Block A shall be relocated to the ground floor corner area of Blocks B and C, by the omission of apartment number 40 and by the relocation of the community, amenity, cinema and multimedia room and the communal amenity lounge area to the ground floor of Block A as indicated on Drawing Number 001000. An outdoor play space for the creche shall be provided to the satisfaction of the planning authority.

The inspectors report commented on the development in relation to the Tallaght Town Centre LAP 2020-2026:

- The proposed development would be a material contravention of the Tallaght Town Centre Local Area Plan 2020-2026, as it exceeds the maximum allowable plot ratio and therefore the density of the development provided for in section 2.6 of the Plan. It does not adhere to the design standards for taller buildings contained in section 2.6 of the Plan. The development would, by itself and through the precedent it would create, undermine the proper planning and sustainable development of the area.
- The proposed development would be a material contravention of the Tallaght Town Centre Local Area Plan 2020-2026, as it provides for an inappropriate mix of dwelling units, with just 6 no. 3-bedroom units provided, 2% of the entire development. the LAP requires a minimum provision of 30% of units as 3-beds in any development, subject to an exception for affordable housing, which this scheme does not qualify for. The development would therefore fail to cater for local need and demand as established in the drafting process of the LAP. The development would, by itself and through the precedent it would create, undermine the proper planning and sustainable development of the area.
- The provision of a creche playground at ground floor level with very little access to direct sunlight, as illustrated in the applicant's Sunlight and Daylight Assessment, would undermine the social and community value of that amenity, and set a poor precedent for the provision of community facilities in the area.

The Boards decision to grant permission in material contravention of the Tallaght Town Centre Local Area Plan 2020-2026 was justified for the following reasons:

Plot Ratio

- Objectives 35 of the National Planning Framework which supports increased residential densities through a range of measures, including area-based regeneration,
- Specific Planning Policy Requirement 3, and Specific Planning Policy Requirement 4 of the Urban Development and Building Heights Guidelines 2018 which support increased densities,
- Regional Policy Objective 4.3 and Regional Policy Objective 5.4 of the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy which support increased densities through the consolidation and re-intensification of infill and brownfield sites within the existing built-up area of Dublin City and suburbs,
- Condition Number 2 (a) and (b) below which reduces the building height, and thence the floor area of the proposed development.



Figure 5 - CGI of Proposed development at Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate, Tallaght

5.2.2 **Former Gallaghers Cigarette Factory Junction of Airton Road and Greenhills Road Reg. Ref. ABP – 306705-20**

Permission was sought for a development located on the Former Gallaher's Cigarette Factory site, at the junction of Airton Road and Greenhills Road, Tallaght, Dublin 24. This is only 360m from the subject site. The development description is as follows:

- Construction of 502 apartments (comprising 197 1-bed; 257 2-bed; and 48 3-bed units) within 6 blocks ranging in height from 4 to 8 storeys. All residential units provided with associated private balconies/terraces to the north/south/east/west elevations. Provision of residential amenity facilities, 3 retail units, creche and services/bin store areas (total non-residential floor area c.1,839sq.m). A total of 202 car parking spaces (at basement and undercroft levels) and 584 no. bicycle parking spaces.

Permission was granted on the 16/06/2020.

5.2.3 **Site at the corner of Airton Road and Belgard Road Reg. Ref. ABP – 305763 – 19**

Permissions was sought on the 25/10/2019 for a development at the corner of Airton Road and Belgard Road, Tallaght, Dublin 24, D24 HD35. This is only 550m from the subject site. The development description is as follows:

- The proposed development will consist of the demolition of the existing industrial buildings on site (4,800 square metres) and the construction of two number blocks comprising 328 number apartments (93 number one-bed, 222 number two-bed and 13 number three-bed), ancillary residential support facilities and commercial floorspace measuring 31,147 square metres gross floor space above a single basement level measuring 5,861 square metres.

Permission was granted on 20/02/2020. The inspectors report anticipated that the Tallaght Town Centre Local Area Plan 2020-2022 would be subject to further amendments and that the plot ratio and heights have a conservative development approach.

5.2.4 **Belgard House, Belgard Square North, Belgard Road Reg. Ref. ABP – 303306-18**

Permission was sought on the 20/12/2018 for the development on the junction of Belgard Road and Belgard Square North for a mixed-use residential development, comprising of the following:

- A new urban quarter and streets with five number blocks to provide 438 number apartment units (including live/work units) and associated amenity facilities,
- a 403 number bed space student accommodation scheme and associated amenity facilities,
- childcare facility (circa 380 square metres),
- six number retail / commercial units (circa 632 square metres in total) and a security room (circa 52 square metres).

Permission was granted on the 22/02/2019.

5.2.5 Glen Abbey Complex, Belgard Road, Cookstown Industrial Estate Reg. Ref. ABP – 309916 - 21

Permission was sought on the 09/04/2021 for the demolition of existing buildings and the construction of a build to rent housing development comprising of 170 no. apartment units and a creche in 2 blocks across 4-7 storeys. A decision was made on the 21st September 2021 to grant permission for the subject proposal

5.2.6 Unit, 5A-C, Second Avenue, Cookstown Industrial Estate Reg. Ref. ABP – 303803 -19

In February 2019 permission was sought for the development of 196 no. Build to rent units at Unit 5, Second Avenue, Cookstown. The application was granted permission by An Bord Pleanála on 25 July 2019.

5.2.7 Planning History Conclusion

A range of applications have been granted permission in recent years that allowed some variation to building heights, plot ratios and land use mix from what is formally prescribed in Local Planning Policy. The granted permissions are in line with strategic planning policy for maximising available development land, regenerating infill/brownfield sites and providing critical mass to support locational advantages associated with public transport and amenities and services. As illustrated in the following sections, the subject proposal can deliver on similar planning and development objectives to maximise the use of this site at Broomhill Road.

6 SECTION 247 PRE – PLANNING

Details on the Pre-Planning Meetings held are set out in brief below.

6.1 Pre-Planning

A pre-planning submission was lodged to the Planning Authority in April 2021. A formal pre planning meeting was subsequently held online between the Design Team and South Dublin County Council SDCC on the 20th April 2021.

We have grouped the key points raised by SDCC at this meeting by theme as follows:

Planning

- Applicant to elaborate on dual aspect proposal for application
- Applicant confirmed this is a build to sell scheme with provision for residential amenity to provide option for full scheme ownership or individual apartment sales if market allows
- Before and after CGI's required for the stage 3 application to the Board
- Breach of building line noted as acceptable at this location
- Minimum requirement of 30% 1-bed noted in LAP
- JFA noted that some 3-bed may be added to scheme
- SDCC noted LAP requires 10% communal open space with provision for payment in lieu
- SDCC noted proposed details for open space in scheme and queried how this would be managed
- Applicant confirmed details of management will be confirmed as part of future application
- SDCC noted the 0.75-1.0 standard in the LAP
- Applicant confirmed a plot ratio of 1.36
- Scheme should consider "Heatnet" proposal, designed to take on heat from existing buildings and indication of what would happen if Data Centres moved on
- SDCC confirmed block sizes should be less than 100m with active frontages at Ground Floor
- 3,500 unit capacity in LAP – these numbers should be reviewed for purposes of SHD application
- SDCC confirmed that although the site is in the REGEN Zone in the County Development Plan, there is a significant qualification at section 3.5 of the LAP RE southern side of Airtown Road
- SDCC confirmed Areas and availability of employment will be an important consideration
- SDCC noted Objective BH1 "Transition to mixed use area primarily focused on higher value commercial uses"
- Applicant to consider commercial uses in scheme and wider area
- Applicant confirmed that the final proposal will consider these requirements in relation to land use and objectives of LAP
- SDCC confirmed that ground floor frontage will require at least some employment uses
- Applicant to be aware of ratios of employment:residential
- Applicant confirmed it is not likely we will breach the cap for consideration of this application under SHD provisions (i.e. 15% or 4,500sqm)
- SDCC confirmed proposal is generally acceptable in terms of permeability. Transition to industrial uses important, provision for future access to adjoining lands to be made. 66, 67 Fourth Avenue SHD application was referenced as an example.
- SDCC referenced Section 8.2.1 of the LAP in relation to sequencing and how Broomhill Road site fits into this

Transport

- SDCC confirmed there is a 0.75 per unit cap on parking in the LAP. 0.4 generally acceptable but 0.5 ratio should be the aim.
- 10% of spaces to be electrical
- 5% of parking to be for mobility impaired
- 6m reversing space to be provided for perpendicular parking
- 380 cycle spaces an appropriate middle ground between Apartment Guidelines and SDCC Standards.

- Road Safety Audit, 2m wide footpaths, waste access, bin storage strategy, Mobility Management Plan, Construction and Demolition Waste Management Plan, Traffic and Transport Assessment, any areas to be Taken in Charge to be provided in application
- Public lighting design to be agreed
- SDCC confirmed any loading/pull in area would depend on LAP – bus routes, cycle lanes etc. Details can be discussed separately if draft scheme prepared

Drainage

- SDCC Drainage Department referred to “Service Maps” for existing services maps. Existing and proposed services with required setbacks shown must be provided at application stage.
- SDCC noted surface water drainage requirements – SUDS , green roofs, swales welcomed
- Applicant noted that all requirements will be met where possible
- SDCC noted that pre connection inquiry and Site specific Flood Risk Assessment will be required

Landscaping

- Nobody in attendance from Parks Department but noted they would seek details on SuDs and gated nature of proposal

Conclusion

As set out in the following sections the applicant has made every effort to respond to the comments by SDCC in the preparation of the scheme for pre-planning submission to An Bord Pleanála. The land use mix represents approximately 4.3% of the floor area is non-residential uses and when taken with the existing established commercial uses this is considered to be acceptable in the context of LAP objectives. Specific items such as car parking, open space and connectivity have been considered as part of the final proposal and are in accordance with standard requirements as set out in the following sections.

7 DESCRIPTION OF PROPOSED DEVELOPMENT

7.1 Proposed Development

The Site Layout Plan (figure 5) prepared by John Fleming Architects (JFA) and Parkhood Landscape shows the overall layout in context. The proposed development provides for a Strategic Housing Development which comprises of the following:

(a) the demolition (total area approx. 4,319.9 sqm) of the existing buildings on site and the existing front boundary treatment; and (b) the construction of a new residential and mixed use scheme of 242 no. apartment units in 5 no. blocks (Blocks A to E) ranging from 4 to 7 storeys in height as follows:

- Block A (5 storeys) comprising 40 no. apartments (4 no. 1 bed, 31 no. 2 bed and 5 no. 3 bed units)
- Block B and C (7 storeys) comprising 102 no. apartments (45 no. 1 bed and 57 no. 2 bed units)
- Block D (5 - 7 storeys) comprising 36 no. apartments (16 no. 1 bed and 20 no. 2 bed units)
- Block E (4 - 5 storeys) comprising 64 no. apartments (31 no. 1 bed and 33 no. 2 bed units)

Block D will accommodate a Childcare Facility/creche of approx. 465sqm at ground floor level.

The proposal will also provide for a café of approx. 50.9 sqm at the ground floor of Block C. Residential amenity areas will be provided in the form of a reception of approx. 125.1sqm, resident lounge of approx. 45sqm, a letting office of approx. 11.8sqm, a rentable room/studio space of 39sqm, a public gym of approx. 128.5sqm and a public co-working space of approx. 128.4sqm, all at the ground floor level of Blocks B & C.

Each residential unit will be afforded with private open space in the form of a balcony or terrace. Communal open space of 1,797.4sqm is proposed in the form of 2no. roof top terraces at Blocks D and E, courtyard space at ground level, outdoor seating and planting and pedestrian and cyclist links. Public open space of 1,400sqm is also proposed in the form of outdoor seating, paved areas, a lawn area, play areas and an outdoor seating area to the front of the proposed café at Block C.

A total of 136no. car parking spaces are provided at ground floor level, including 7 no. Accessible spaces at surface level; and 426 no. bicycle spaces (Visitor and Resident in bike stands and secure stacked bike spaces) are proposed.

The development shall be served via a new vehicular access point from Broomhill Road. Upgrade works are proposed to the vehicular access point to facilitate the proposed development and to provide for improved access and egress for the overall development. New pedestrian and cyclist access points will be provided on to Broomhill Road from the site.

The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; boundary treatment; internal roads and footpaths; waste storage areas and electrical services and all associated site development works.

Figure 6 - Proposed Site Layout Plan [Source: Proposed Site Plan prepared by JFA and Parkhood]

7.2 Detailed Description

7.2.1 Proposed Demolition

The subject proposal will provide for the demolition of all of the existing buildings on site including industrial and office buildings.

The total floor area of buildings to be demolished is 4,319.95sqm and is illustrated on JFA drawing “Proposed Demolition Plans & Elevations”.

7.2.2 Public Open Space

The delivery of a central public area of open space and a quality landscape plan has been a key objective from the outset of design. The design team recognised the importance of a meaningful open space within the site to complement the green, sylvan nature of the surrounding street network.

It is proposed to provide Communal Open Amenity Space of approx. 1,797.4sqm and Public Open Space provision of approx. 1400sqm at grade in the form of a central courtyard area, pedestrian walkways through the site, and active landscaping throughout the site, including play opportunities and outdoor seating and play area associated with the creche and the Café respectively.

The open space will be of exceptionally high quality and is to be mainly situated within the central area and is considered to be a focal point of the overall masterplan. A cluster of raised lawn areas forms multi-functional and flexible open space for residents to utilise in various ways. Pedestrian routes throughout the

green spaces allow for residents to flow through the space seamlessly. The public open space includes green infrastructure (including rain gardens), pocket parks, urban furniture, shared spaces, and designated play spaces for resident and local visitor use.

The majority of green space is overlooked by dwellings ensuring adequate passive supervision, which helps to discourage any anti-social behaviour. Incidental planting of trees and shrubs along the front of the blocks helps to create pockets of privacy while providing a natural buffer for apartments located on the ground floor. The collective green area will provide highly useful amenity space for residents of the proposed development.



Figure 7 - Extract from Proposed Landscape Masterplan [Source: Parkhood Landscape Masterplan]

In line with SDCC development plan requirements, the landscape design incorporates features to promote children's play. Provision for children's play are proposed within the central courtyard, public open space through a Local Equipped Area for Play (LEAP) and natural play elements.

The two main play areas are within the central courtyard open space and adjacent to the creche on the corner of Block D.

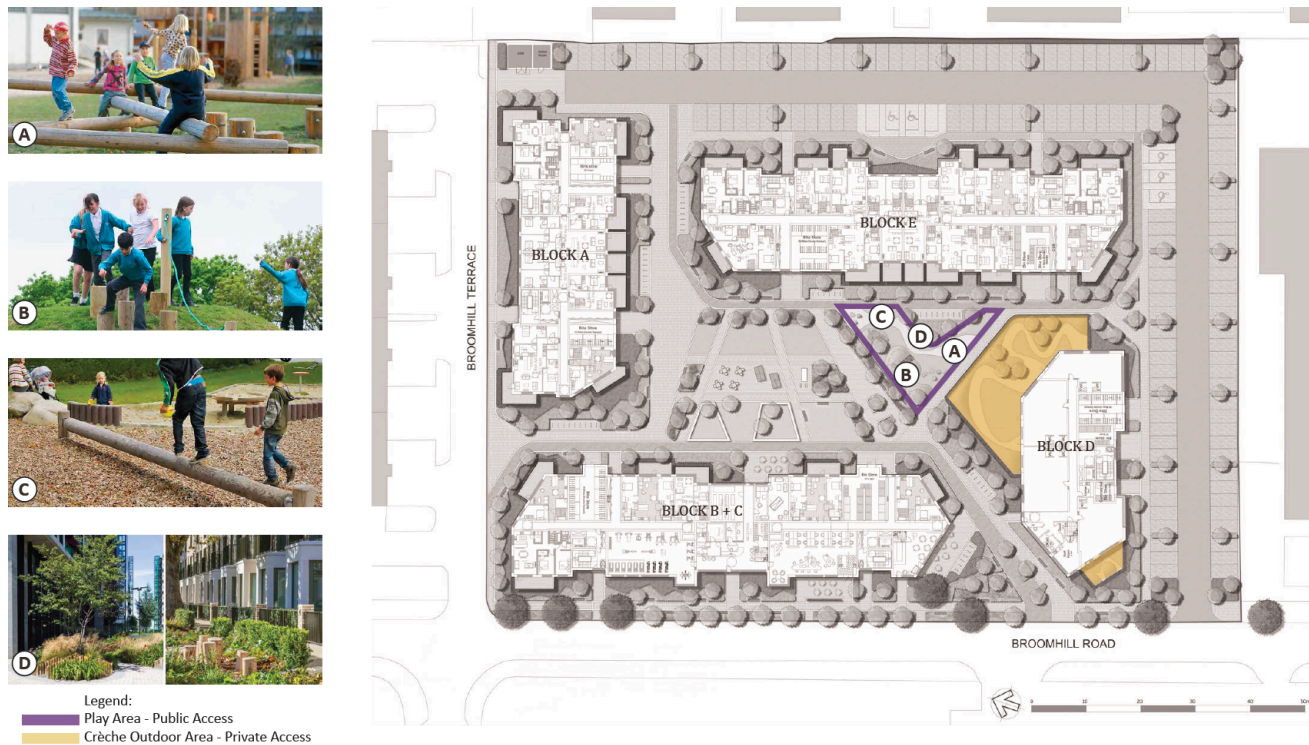


Figure 8 - Proposed Landscape Masterplan indicating play areas [Source: Extracted from Parkhood Landscape Plan]

The Landscape Design Statement prepared by Park Hood further describes the approach to the landscape design, which aims to encourage sociability, provide for playfulness, and find sustainable solutions in the design of this site. Walkways, seating, planting, and green roofs are incorporated into the scheme for a comprehensive landscape masterplan for the site.

7.2.3 Residential Element

A total of 242 residential units are proposed in five blocks (A, B and C, D and E). Of the 242 no. units, 96no. will be a one-bed unit 141 no. will be 2 bed units and 5 no. will be 3 bed units (39.7%/58.3%/2.1%).

The proposed building heights will be from 4 to a maximum of 7 storeys on the western boundary overlooking the adjoining broad, tree lined Broomhill Road. The height at the interface with adjoining industrial units is 4-5 storeys which is considered appropriate within this evolving, regenerating setting.



Figure 9 – Proposed Building Heights Across the Site (Contiguous West Elevation) [Source: Extracted from JFA's Design Statement]

7.2.4 Dual Aspect

At least 117 of the 242 units proposed will have the benefit of dual aspect, equating to approx 49% of all units. A further 59 units are provided with a projecting bay window for an enhanced single aspect unit. These units are of high quality amenity and are detailed in the documents prepared by John Fleming Architects.

7.2.5 Residential Density

The residential density proposed at this site will be 242 units on a site area of approx. 1.4 ha. This equates to approx. 172 units per ha. It is our submission that this residential density is supported by national policy which is aiming to deliver increased height and densities at appropriate locations. The site can accommodate this density given its proximity to public transport i.e. Luas Stations and bus services as well as Tallaght Town Centre.

7.2.6 Communal Facilities

The following communal facilities will be provided for the benefit of residents and, where appropriate, the wider community:

- A childcare facility (approx. 465 sqm) will be provided at ground floor of Block D. This facility is described in more detail in the following section.
- Café at the ground floor of Block C (approx. 50.9 sqm).
- Resident support services and reception services at the ground floor of Block B and C to include studio (39sqm), Resident's Lounge (45sqm), Reception (125.1sqm), Locker's (4.5sqm), Parcel Room (7.4sqm) and letting office (8.4sqm), all totalling (approx. 229.4 sqm).
- A public gym at the Ground floor of Block B and C (approx. 128.5 sqm).
- A co-working space of 128.4sqm at Ground Floor of Blocks B and C.

These facilities will add new uses to the wider area, creating an attractive site with the appropriate level of activity and account for 4.3% of the overall floor area in the subject proposal.

7.2.7 Childcare Provision

It is proposed that a childcare facility (approx. 465 sqm GFA) is provided at ground floor of Block D with associated outdoor play spaces. The facility will be conveniently located near the vehicular entrance via Broomhill Road with drop off via the car park to the south. The size of this facility is such that it can cater for the anticipated childcare demand arising from the proposed development.

One bedroomed units are not considered to contribute to childcare demand under the 2018 Apartment Guidelines. Therefore, a total of 142 no. units (with typically one child) have the potential to require childcare. Additionally, the 2001 Childcare Guidelines have identified that only 50% of units will require childcare. This results in a total of 71 no. units considered to require childcare provision.

While the demand arising from the proposed development is only marginally above the one per 75 unit requirement, it is considered prudent to include a childcare facility as part of the proposed development.

Appropriate drop off and car parking will be provided to cater to this facility within the overall car parking area.

We therefore submit the proposed development is acceptable in addressing the anticipated demand that might arise from the proposed development. The full analysis of childcare provision requirements is provided in the following sections.

7.2.8 Car and Bicycle Parking

The proposed development will provide for 136 no. car parking spaces at surface level. 7no. accessible car spaces will also be provided at surface level. This is included in the 136no. total. Provision will be made for 308 no. resident bicycle parking spaces at surface and within a secure bike store. 118no. visitor bike parking spaces will be provided giving a total of 426 bike parking spaces.

The transport proposals for the development are outlined further in the Traffic and Transport Assessment and Residential Travel Plan prepared by NRB Consulting Engineers.

7.2.9 Part V Provision

The proposal provides for 24 no. Part V residential units within the scheme (10% of the total 242no. units), which meets the social housing requirements of South Dublin County Council. These units are identified in Proposed (PART V) Site Plan prepared by John Fleming Architects. We also refer An Bord Pleanála to the SDCC Validation Letter and Cover Letter and Costings document enclosed¹.

¹ Please note that the content of this Part V proposal is purely indicative and is intended to provide a reasonable estimate of the costs and values of the units based on construction costs and values prevailing at the time of the application. Please also note that the information set out herewith is purely for the purposes of facilitating the making of a valid planning application and will ultimately be subject to possible amendment and formal agreement with the Local Authority. The financial data contained herein is provided to the level of detail commensurate with this stage of the Part V process having regard to Circular Letter 10/2015 and should be read as being indicative as a result.

We note under the Amendment to the Act and its accompanying Regulations that the ultimate agreement with regard to Part V is dependent a) upon receipt of a final grant of permission and b) upon a site value at the time the Permission is granted; neither of which can be available at this time.

The above is obviously subject to change depending upon the nature of any final grant of permission, including Conditions and the assessment by the Housing Authority of the ultimate proposal. Final costs will be based on site value at the time the Permission is granted.

Finally, we would wish to highlight that the above information is being provided on a wholly without prejudice basis in order to comply with the Planning & Development Regulations in force at this time. The final details of any agreement with the Local Authority regarding compliance with Part V, including agreements on costs will not be arrived at until after planning permission has been secured as is provided for under the Planning & Development Act 2000, as amended.

8 RELATIONSHIP TO SURROUNDING DEVELOPMENTS

This section of the report provides a summary of the relationship of the proposed development to existing surrounding development.

8.1 Description of Surrounding Development

The site's current use is a vacant industrial unit with associated landscaping and car parking. The location is a mix of bulky retail, office, industrial, warehousing and business parking with a number of vacancies in the area. The site is on the eastern side of Broomhill Road and south of Broomhill Terrace.

The site is located within the “Airtown Precinct” which is the largest precinct in the Tallaght Town Centre area and includes a number of industrial/business estates known as the Airtown Business Park, Belgard Industrial Estate, Broomhill Business Park, Greenhills Business Park, Greenhills Industrial Park and Hibernian Insurance Industrial Estate that were built out over the latter half of the 20th Century. The existing land uses are primarily industrial and commercial with the predominant buildings being large scale and low-rise warehouses. Premises in the locality include the Amazon Data Services Ireland Ltd., a Driving Test Centre and Hewlett Packard. Buildings are generally setback from the roads behind security fences or walls with extensive yards, car parking and incidental landscape verges or areas. A number of older industrial buildings have been demolished and replaced with modern office buildings whilst others have been converted to showroom uses including car sales. Further changes include the lands to the west of Belgard Road are now part of Belgard Retail Park (2003) which includes a drive-through Burger King, B&Q, Mothercare, and Halfords retail units which merge into the Cookstown Industrial Estate further west. There are no notable buildings or historic landmarks in the local area.

The land uses and employment uses in the surrounding area are shown in the figures below.

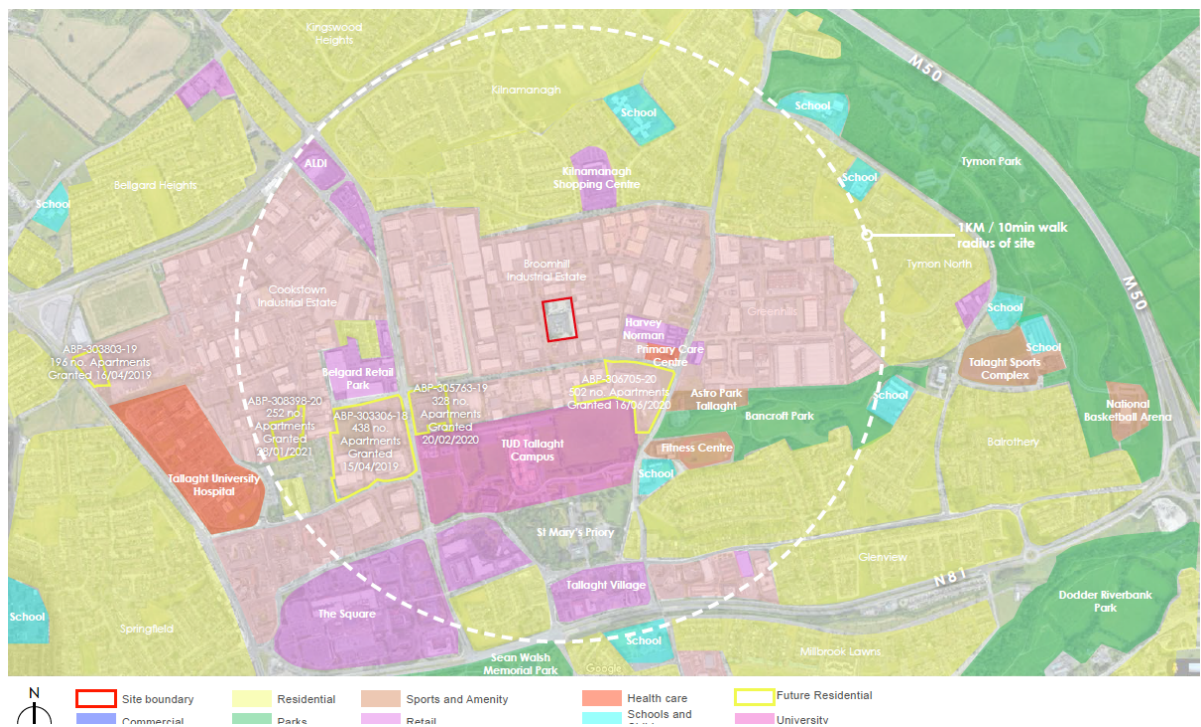
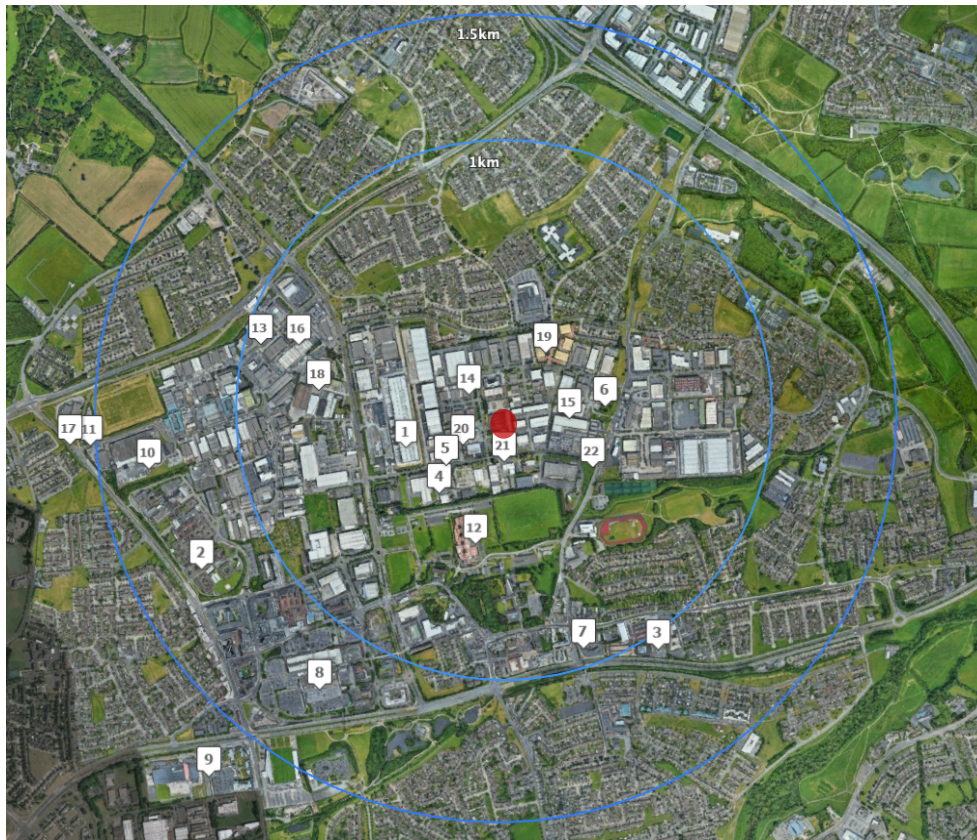


Figure 10 – Surrounding Developments



Company or Business Park	
1	Amazon
2	Tallaght Hospital
3	Lidl Ireland Head office
4	Johnson and Johnson
5	Ayrton Group
6	Valeo Foods
7	Bank of Ireland
8	The Square Tallaght
9	Tallaght Business Park
10	Allied Logistics Limited La ROUSE Musgrave Tallaght
11	Prodieco - Advanced Engineering Solutions
12	TU Dublin Tallaght
13	Aveo Global Food Solutions
14	Broomhill Business Complex
15	Harvey Norman Flagship Tallaght
16	Cookstown Court
17	Doyle's Bakery
18	Heineken Ireland Sales
19	Broomhill Business Park
20	Airton Business Park
21	Zoetis
22	Kilnamanagh Tymon Primary Care Centre

8.2 Relationship to Surrounding Development

Tallaght is the largest town in south County Dublin and the largest suburb of the city. Located 13km south-west of the city centre, the population in the 2016 Census was 76,119. The town centre (“The Square”), approximately 1km to the south-west of the Application Site, has developed since the 1980’s and is now one of Ireland’s largest shopping centres. The area includes local and central government offices (South Dublin County Council), three hotels, retail commercial, civic, educational facilities, cultural centres (Rua Red Arts centre and The Civic Theatre) and Tallaght Hospital.

Tallaght town has been the focus of more recent multi-storey apartment development with several planning applications for residential schemes recently consented a 328 no. unit residential development (rising to 7 storeys) at the junction of Airton Road and Belgard Road (380m from the Application Site) and a similar large-scale residential project (Planning Reference: SHD ABP – 303306-18) off Belgard Road to its west.

Local Open Spaces and Amenities

The nearest open spaces are associated with the Technological University Dublin just over 200m to the south of the site beyond Airton Road. It is part of the second-largest 3rd Level Institution in Ireland with a student population of 28,500. Views towards the Application Site are restricted by intervening buildings on Airton Road and vegetation.

Bancroft Public Park is located just over 380m to the south-west to the west of Greenhills Road and includes sports facilities, walking trails and wooded glades. Views towards the Application Site are restricted by intervening buildings on Airton Road and Greenhills Road and vegetation

Sean Walsh Memorial Park (1989) is located approximately 1km m due south of the Application Site off the N81 Road. From this area, and more exposed or elevated parts of Tallaght there are open views towards the Dublin / Wicklow Mountains to the east and south. Views towards the Application Site are restricted by intervening townscape in Tallaght.

8.3 Conclusion

Our assessment of the proposed development illustrates it can be positively received by the surrounding area. As Park Hood Landscape Architects concludes in their report: *“The Application Site comprises a commercial and industrialised landscape dominated by large scale buildings and functional yards set to the east of the Broomhill Road in Tallaght, Dublin 24. The proposed development, while substantial, would result in a positive contribution to the character and urban fabric of this area in terms of landscape character and quality due to both the low sensitivity, quality and nature of the existing site and the proposed revitalisation and new architectural character. While recognising there are some significant local impacts the opinion is, on balance, that this proposal has no unacceptable townscape / landscape or visual effects and can be successfully absorbed into the character of this part of Dublin.”*

A significant mix of established commercial uses exist within the Tallaght LAP area and more specifically within the Broomhill precinct surrounding the subject site. The subject site is one of very few vacant sites within the Broomhill area and one of the remaining few that are available to provide residential land supply. The subject proposal provides residentially led regeneration in accordance with the zoning provisions for the site but also provides a mix of uses that will enhance the local area. When taken in conjunction with other new permissions in the area, the subject proposal is considered to have a positive impact on the surrounding area.

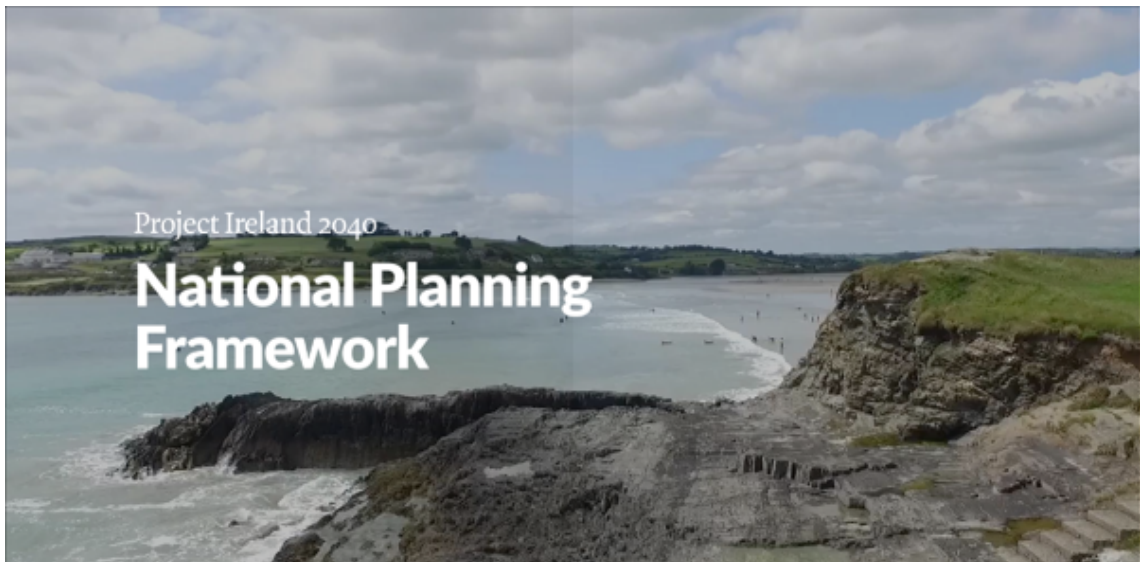
9 STATEMENT OF CONSISTENCY - STRATEGIC PLANNING CONTEXT

9.1 Introduction

The key provisions of national (including relevant Section 28 guidelines) and regional planning policy as it relates to the proposed development is set out in the following sections. The key policy and guidance documents of relevance to the proposed development are as follows:

- Project Ireland 2040: National Planning Framework (2018);
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016);
- National Student Accommodation Strategy (2017);
- Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031
- Sustainable Residential Development in Urban Areas (2009)
 - a. Urban Design Manual - Best Practice Guidelines
- Delivering Homes, Sustaining Communities (2008)
 - b. Best Practice Guidelines - Quality Housing for Sustainable Communities
- The Planning System and Flood Risk Management (2009)
- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)
- Sustainable Urban Housing - Design Standards for New Apartments (2020)
- Urban Development and Building Height Guidelines (2018)
- Design Manual for Urban Roads and Streets (DMURS) (2013)

9.2 Project Ireland 2040 – National Planning Framework



The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040. It caters for:

- The extra one million people that will be living in Ireland by 2040
- The additional two thirds of a million people working in Ireland by 2040; and
- The half a million extra homes needed in Ireland by 2040.

The Framework focuses on:

- Growing our regions, their cities, towns and villages and rural fabric.

- Building more accessible urban centres of scale.
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment and delivery.

As a strategic development framework, this Plan sets out the long-term context for the country's physical development and associated progress in economic, social and environmental terms and in an island, European and global context. Project 2040 is followed and underpinned by supporting policies and actions at sectoral, regional and local levels.

The key high - level objectives of the Plan are:

- To continue on a path of economic, environmental, and social progress that will improve our prosperity, sustainability and well - being.
- To ensure that Ireland's many unique assets can be built upon, with an emphasis on improving economic output and stability as well as quality of life, environmental performances and the livability of Dublin, our cities, town, and rural areas.
- To set out likely future change in Ireland and the spatial pattern required for effective and coordinated investment in a range of sectors to best accommodate and support that change.
- To put in place a strategy for the sustainable development of places in Ireland and how that can be achieved through planning, investment, and implementation.

It is also apparent from the NPF that low-density housing development, and underused sites, have heretofore, been a feature of Ireland's housing landscape in cities, towns, and the open countryside. To avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in the urban areas.

The NPF sets out that the Eastern and Midlands region will, by 2040, be a Region of around 2.85 million people, at least half a million more than today. It is identified that progressing the sustainable development of appropriate sites for housing and particularly those close to public transport corridors is key to enabling growth. In particular, National Policy Objective's (NPO) 13 and 35 are relevant to the proposed development which seeks to move away from prescriptive development management policies towards an evidence-based approach:

*"In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected"*².

"Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights".

NPO 28 has a stated aim to ensure that safe and convenient alternatives to the car are integrated into the design and planning of new communities which is fully consistent with the proposed reduced level of car parking provision in the scheme.

It is submitted that the current proposal will deliver on the above objectives of the NPF. We note specifically that the addition of 276 no. bed spaces, in total, is an appropriate level of development at this highly accessible site.

We submit to the Board that the proposal for residential accommodation at this appropriate location is consistent with the National Planning Framework for 2040.

² <https://npl.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

9.3 Housing for All: A new Housing Plan for Ireland

Housing for All

A new Housing Plan for Ireland



The Housing for All (HFA) plan has been introduced by the Government in order to achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure. It caters for:

- Preventing homelessness
- Protecting tenants
- Supporting social inclusion

The plan focuses on:

- Introducing incentives and measures to bring vacant and derelict properties back into residential use.
- Supporting homeownership and increasing affordability.
- Preventing homelessness, protecting tenants and supporting social inclusion and increasing social housing delivery.
- Increase the levels of new housing stock with the goal of ending homelessness by 2030.
- Achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure.
- Increasing the capacity and efficiency of delivery in both public and private sectors.
- Over 300,000 new homes to be built by 2020, including a projected 54,000 affordable homes for purchase or rent and over 90,000 social homes.
- Setting out a pathway to economic, societal and environmental sustainability in the delivery of housing.

The HFA is to be the largest State led building programme in our history and is financed by the biggest State funding commitment ever. The HFA also has the largest ever housing budget in the history of the State to transform our housing system, with an excess of €20 bn in funding through the Exchequer, the Land Development Agency (LDA) and the Housing Finance Agency over the next five years.

It is also apparent from the HFA plan that high-density housing is to be supported. Within the plan, a new fund the Croí Cónaithe (Cities) Fund has been introduced to further the implementation of planning permissions for apartments. Housing policy objective 15, no. 15.1 states that the HFA plan will “Introduce the

Croí Cónaithe (Cities) Fund to ensure that planning permissions for apartments in high density areas already secured by 2021 are activated by the end of 2025 for build to sell.”

*In addition to this, the new fund will focus on “activating housing supply through enhanced viability measures targeted at developing properties for individual household purchasers, including first-time buyers and right-sizers.” The fund will “stimulate activation of existing planning permissions for **build-to-sell apartment developments** of four floors or more, above a certain density threshold, and this will be complemented by the sanction of a tax to activate vacant lands for residential purposes.”*

Moreover, housing policy objective 11, no. 11.2 supports high-density housing: “Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities.”

Additionally, housing policy objective 12, no 12.2 is to deliver a new approach to active land management: “Develop proposals for new Urban Development Zones, to DHLGH deliver a coordinated and transparent approach to the delivery of residential and urban development, particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework.”

Furthermore, the HFA plan will drive economic sustainability and reduce constructions costs. Objective 23, 23.11 states that the HFA plan will “Reduce C&D waste and associated costs by working with the construction industry on demonstration projects to show how best practice (specifically in relation to urban high-rise apartment developments) waste segregation and other waste management measures, can reduce overall C&D disposal costs.”

We submit to the Board that the proposal for residential accommodation at this appropriate location is consistent with the Housing for All Plan.

9.4 Rebuilding Ireland: Action Plan for Housing and Homelessness 2016



The Action Plan for housing and homelessness recognises that a significant increase in new homes is required. The action plan outlines a 5 pillar approach as follows:

- Pillar 1 - Address Homelessness
- Pillar 2 - Accelerate Social Housing
- Pillar 3 - Build More Homes
- Pillar 4 - Improve the Rental Sector
- Pillar 5 - Utilise Existing Housing

The plan outlines that “Accelerating delivery of housing for the private, social and rented sectors is a key priority for the Government. Ensuring sufficient stable and sustained provision of housing that is affordable, in the right locations, meets peoples different needs and is of lasting quality is one of the greatest challenges facing the country at present.”

The plan repeatedly states the need for housing to be in appropriate locations, locations within Dublin and urban or central locations, “In addition to the scale of housing provision, the delivery of housing in the right place is also central to enabling a good standard of living and improving quality of life. Locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.”

The proposed development supports Pillar 3 of the plan specifically by way of the delivery of 242 no. residential apartments at a key, accessible location. The site has the benefit of accessibility to both the bus and Luas services and is considered a significant opportunity site for the delivery of residential units in a regeneration area close to Tallaght Town Centre.

The proposal also supports Pillar 2 by providing for social housing through the provision of 24 no. units (indicative) for Part V purposes.

We submit to the Board that the proposal is consistent with the Action Plan for Housing and Homelessness.

9.5 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031



The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES)* was published and adopted in 2019. This Strategy provides the policy framework to manage spatial planning and economic development in the Region. The document consists of the following:

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- **Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.

- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The site is identified as being located in the ‘Dublin City and Suburbs’ and is part of the Dublin Metropolitan Area as set out below:



Figure 9-1 Dublin City and Suburbs [Source: RSES for Eastern and Midland Regional Assembly, shape added via Adobe Illustrator]

The Dublin Metropolitan Area Strategy Plan (MASP) in Chapter 5 of the RSES identifies a number of large – scale strategic residential and economic development areas, that will deliver significant development in an integrated and sustainable manner in the metropolitan area.

The requirement for the preparation of MASP was set out in Project Ireland 2040 - National Planning Framework. MASP provides for a 12-20 year strategic planning and investment framework for the Dublin Metropolitan area.

The following Housing and Regeneration Policy Objectives are considered relevant to the current proposal:

MASP Housing and Regeneration

“RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments Guidelines and ‘Urban Development and Building Heights Guidelines for Planning Authorities.”

“RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.”

It is clear that the RSES supports continued population and economic growth in Dublin City and Suburbs, with high quality new housing promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration. It is set out that there is an opportunity to promote and improve the provision of public transport and active travel and the development of strategic amenities to provide for sustainable communities. In terms of consolidation a re-intensification, the following policy objective is noted:

Consolidation and Re-Intensification

“RPO 4.3: Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”

Having reviewed the key policies of the recently adopted RSES document, we are of the view that the current proposal complies with the spirit and intent of RSES. The proposal delivers a consolidated approach to development in that it maximises on height, delivers an appropriate site coverage and residential density on a site with exceptional public transport accessibility.

We submit to the Board that the proposal is consistent with the Regional Spatial and Economic Strategy for the Eastern & Midland Region.

9.6 Design Manual for Urban Roads and Streets 2019



The Design Manual for Urban Roads and Streets (DMURS), 2019, sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. DMURS places a focus on pedestrians, cyclists and public transport users and sets out guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland.

Consideration of DMURS and its contents has been a key objective for this project.

The Transport Assessment prepared by NRB Consulting Engineers provides further detail in respect of compliance with DMURS and illustrates the subject proposal is fully compliant in this regard.

We submit to the Board that the proposal for a high density, mixed tenure development at this highly accessible location is supportive of the objectives of Design Manual for Urban Roads and Streets (2013).

9.7 Smarter Travel - A New Transport Policy for Ireland 2009-2020



The Government has committed in 'Smarter Travel - A Sustainable Transport Future: A New Transport Policy for Ireland 2009 - 2020' to reducing the total share of car commuting from 65% to 45%, a rise in non-car trips by 55% and that the total vehicle miles travelled by the car fleet will not increase.

The key goals of the Guidelines by 2020 are as follows:

- Future population employment growths will predominantly take place in sustainable compact forms which reduces the need to travel for employment and services;
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%;
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work;
- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels;
- A reduction will be achieved on the 2005 figure for Greenhouse gas emissions from the transport sector.

Achieving sustainable transport will require a suite of actions that will have complementary impacts in terms of travel demand and emissions. These are as follows:

- Actions to reduce the distance travelled by private car and encourage smarter travel.
- Actions aimed at ensuring that alternatives to the car are more widely available.
- Actions aimed at improving the fuel efficiency of motorised transport.
- Actions aimed at strengthening institutional arrangements to deliver the targets.

Smarter Travel acknowledges that good progress is being made in meeting the above targets and actions by providing better guidance on planning and development through the delivery of Planning Guidelines. This section of the report has clearly outlined how the current proposal complies with such guidelines.

The proposed development represents a new residential scheme which, through demand management, will ensure that the majority of residents will use public transport and sustainable modes of transport to and from the development site. These are detailed by NRB Consulting Engineers in the accompanying Transport Assessment and Preliminary Travel Plan.

We submit to the Board that the proposal for a high density residential development at this highly accessible location is supportive of the objectives of Smarter Travel - A New Transport Policy for Ireland (2009-2020).

9.8 Transport Strategy for the Greater Dublin Area 2016-2035



The National Transport Authority has prepared this strategy. The Vision of this strategy is for Dublin to be a competitive, sustainable city-region with a good quality of life for all by 2030.

The Strategy includes five overarching objectives to achieve the vision, which are as follows:

- Build and strengthen communities
- Improve economic competitiveness
- Improve the built environment
- Respect and sustain the natural environment
- Reduce personal stress

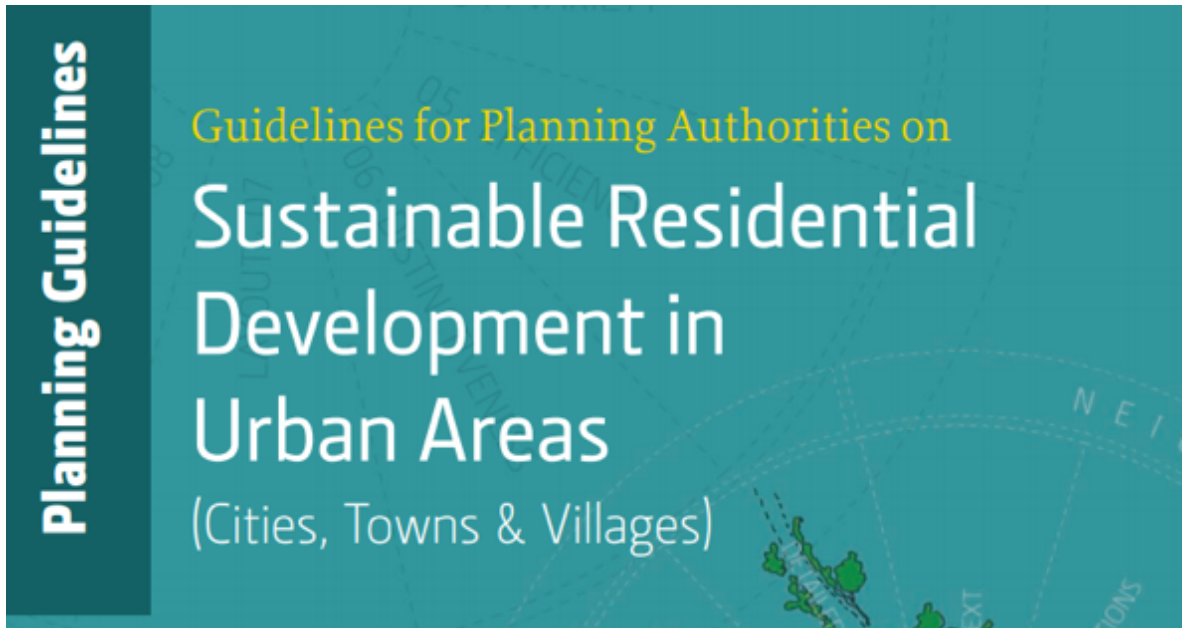
The Strategy sets out measures to achieve the vision and objectives for the GDA. These include better integration of land use planning and transportation, consolidating growth in identified centres, providing more intensive development in designated town and district centres and control parking supply.

The Strategy Infrastructure proposals are presented by mode of transport and relate to heavy rail infrastructure, light rail infrastructure, bus infrastructure, cycling infrastructure, walking and road network. Whilst the key objectives of the Transport Strategy relate to the main town centre area, we wish to highlight that the current proposal for residential development moves away from car provision for each resident of

the development. This can be achieved as a direct result of the proximity of high-quality public transport, employment centres and local services and facilities.

We submit to the Board that the proposal for a high density residential development at this highly accessible location is supportive of the objectives of the Transport Strategy for the Greater Dublin Area 2016-2035.

9.9 Sustainable Residential Development in Urban Areas (2009) / Urban Design Manual (2009)



The role of these guidelines is to ensure the sustainable delivery of new development throughout the country. The Guidelines provide guidance on the core principles of urban design when creating places of high quality and distinct identity. High quality design is recommended in the development management process. The Guidelines are accompanied by an Urban Design Manual, which demonstrates how key principles can be applied in the design and layout of new residential development.

Chapter 5 of this document focuses on Cities and Larger Towns. It is our view that this part of Dublin fits under the larger towns category in the Guidelines given that population of Tallaght is over 5,000 which appropriately defines larger towns.

We examine the contents of the Guidelines below as they relate to Larger Towns.

Design

The key elements of design in the context of larger towns are as follows:

- Acceptable Building Heights
- Avoidance of Overlooking/Overshadowing
- Provision of adequate public and private open space
- Internal Space in Apartments
- Suitable parking provision
- Provision of ancillary facilities

The current proposal has been designed in the context of the above and we note the following in this regard:

- Appropriate building heights are proposed in accordance with the County Development Plan, Local Area Plan and Building Heights Guidelines.
- The potential for overlooking and overshadowing will be reduced as minimum separation distances are maintained and reduced heights at interface with other uses. A Sunlight and Daylight analysis by 3D Design Bureau is attached to this application to elaborate further on this matter.
- Adequate open space will be provided in the form of a central courtyard with a mix of purposes and functionality including pedestrian paths, seating and play areas.
- The proposal complies with all requirements of the Apartment Design Guidelines in terms of residential amenity provided
- An adequate level of parking is provided within the site that provides a balance between parking provision and promotion of sustainable modes.
- Pedestrian and cyclist access and permeability is key throughout the site.
- Quality communal facilities will be provided within the scheme including a gym, residential facilities, and co-working space.

Density

The proposed development aims to deliver an appropriate density and form of residential development on this opportunely located site.

A density of 172 units per ha is proposed at this site. It is submitted that this is an appropriate approach to development at this location given the site location and immediate site context. The site can be classified as a 'public transport corridor' (within 1km of light rail) and the guideline for density here refers to there being a minimum density of 50 dwellings per hectare.

It is considered that the proposed development is located on suitably zoned land for residential purposes. The density requirement set out by the current County Development Plan and national guidance has been taken into consideration when designing the scheme. The site layout maximises permeability through appropriate block sizes, block heights and connectivity can be accommodated with any future development proposals. Careful consideration has been given to adjoining levels of amenity and compliance with all Development Plan standards has been achieved.

Urban Design Manual



Aside from the above, we draw the attention of An Bord Pleanála to the compliance of the scheme with the 'sister' document for these guidelines, the 'Urban Design Manual'. This SHD application is accompanied by the Architectural Design Statement, prepared by John Fleming Architects, which demonstrates how the

proposed development has regard to and has been developed in accordance with best practice in respect to urban design. For the purposes of this Statement of Consistency, compliance with the 13 key requirements of the Urban Design Manual are noted below:

Table 9-1 Compliance with Urban Design Manual

Criteria	Proposed Response
CONTEXT How does the development respond to its surroundings?	<p>The proposed development will be located at a site zoned for Regeneration and has existing street frontages along Broomhill Road and a direct interface with Broomhill Terrace. The proposal aims to enhance the regeneration of this industrial area and promote activity in conjunction with the residential development by providing for commercial/cafe unit, co-working space, and gym where the building fronts Broomhill Road. A creche is also proposed at the Broomhill Road interface to further enhance activity at this location. Increased heights are considered appropriate at this frontage with a seven-storey block proposed at the interface with the wide Broomhill Road carriageway, and lower heights proposed within the site and at the boundary with other land uses.</p> <p>Due consideration has been given to the existing height and density of surrounding development. The proposed development is designed to take this into account in line with national direction and imperatives for increased densities at appropriate locations such as this one.</p>
CONNECTIONS How well is the new neighbourhood/site connected?	<p>The proposal delivers on the following in terms of connections:</p> <ul style="list-style-type: none"> ○ Appropriate access points are provided to the development. ○ The site's close proximity to Belgard Road and Greenhills Road ensures a safe and easy access from the site to amenities and facilities in the area ○ Direct and high-quality pedestrian linkages are provided between the site and the existing pedestrian and cycling facilities on the surrounding road network. ○ Future connections to surrounding sites are provided for subject to agreement
INCLUSIVITY How easily can people use and access the development?	<p>Currently, the site is dominated by car parking with little benefit to users in terms of public realm. The proposed development will improve the use of the site through high quality landscaping and new and improved pedestrian and cyclist access. The proposal has been designed to be universally accessible both in terms of the residential accommodation and the wider site and uses. All floors will be accessible via lift and the units are designed to allow for full Part M accessibility</p>
VARIETY How does the development promote a good mix of activities?	<p>The proposed development provides for residential accommodation in an area with a significant lack of this type of development and which has been identified for enterprise or residential led regeneration. The development itself will not only provide residential accommodation, but a café use, gym use and co-working space at the Broomhill frontage to add to the proposed creche use along this frontage. The residents will have a diverse range of amenities available to them including residents lounge, rent a room, management facilities and a gym.</p> <p>The landscaped elements of the site will include a quality landscape along new and improved pedestrian and cyclist links. A comprehensive Landscape Proposal has been prepared by Park Hood and is enclosed with this application.</p>
EFFICIENCY How does the development make appropriate use of	<p>The redevelopment of this infill site for residential accommodation and associated uses will significantly improve the use of this underutilised site. The delivery of a sustainable density and height has been driven by national policy and the need for housing. The site has the appropriate services in place and is well located in terms of local amenities and public transport. The proposal will involve the regeneration of this site that is optimally located in</p>

resources including land?	proximity to Tallaght Town Centre, Tallaght Hospital, Technical University Tallaght and is readily accessible to public transport.
DISTINCTIVENESS How do the proposals create a sense of place?	<p>The scheme promotes the principles of DMURS - Design Manuel for Urban Roads and Streets. This balance of road planning, public space and site layout will provide an inviting and enticing setting for a new community.</p> <p>The proposal provides an opportunity to act as a catalyst for the commencement of wider development and, ultimately, a plan led regeneration of the area.</p>
LAYOUT How does the proposal create people-friendly streets and spaces?	<p>The proposed layout of the building responds to the site context and its proximity to neighbouring buildings. The height of the building will taper down to the rear as it interfaces with adjoining uses, with the increased height of 7 storeys at the Broomhill Road side. Pedestrians and cyclists are given separate accesses to vehicular traffic from Broomhill Road. Aside from access, places for people to stop and stay will be provided throughout the site i.e. seating elements along the new landscaped area.</p>
PUBLIC REALM How safe, secure and enjoyable are the public areas?	<p>The proposed open space will be overlooked by the apartments so that users will feel comfortable and safe using this space. This includes the childrens' play areas. The landscape masterplan is set out as to provide a differentiation between types of open space. The car parking area/drop off for the creche is kept to the boundary of the site to maintain a pedestrian friendly central space and to provide separation with adjoining uses/future blocks. The car parking area will also be enhanced through quality landscape design.</p>
ADAPTABILITY How will the buildings cope with change?	<p>Some of the proposed apartments have been designed to allow for potential modifications in the future with minimal impact on the building fabric (i.e. divisible spaces). The larger two bed apartments can be adapted to include office space, a secondary walk in closet or enlarged living/dining space. All the apartments are designed to maximise daylight admittance and the building fabric will be highly insulated, meeting or exceeding the requirements of Part L of the Building Regulations. The mix of uses for gym, childcare facility, café, and residential amenities can be adopted to suit appropriate future needs and requirements.</p>
PRIVACY AND AMENITY How do the buildings provide a high quality amenity?	<p>All apartments will be afforded their own private open space in the form of a balcony or terrace. Additionally, almost half of the apartments will have dual aspect. Appropriate setbacks are provided between the proposed buildings as to avoid overlooking and provide privacy. The proposed buildings are also setback from boundaries shared with other uses to provide privacy while also avoiding any amenity impacts at this location. The apartments are designed to prevent sound transmission by appropriate acoustic insulation or layout. Residential tenant amenities such as co-working space, resident lounges and gym are provided to enhance the overall residential experience in this development.</p>
PARKING How will parking be secure and attractive?	<p>Car parking will be provided in a landscaped area at the western and southern boundaries of the site and will provide convenient and direct access to each block for residents that require a parking space. Some car parking will be dedicated for creche drop off and pick up and all spaces will be conveniently overlooked by adjoining apartments to provide passive surveillance. Given the proximity of the subject site to surrounding services and amenities, including public transport, a reduced level of parking is proposed to enhance the sustainability of the subject proposal and reduce reliance on the private car.</p>
DETAILED DESIGN How well thought through is the building and landscape design?	<p>We refer the Board to the Architectural Design Statement prepared by John Fleming Architect, the Landscape Design and Access Statement prepared by Park Hood and the Planning Report prepared by Brock McClure Consultants for further details on design.</p> <p>The proposed scheme has been analysed from a residential amenity perspective, drainage and engineering design, traffic and transport and landscaping layout to define an exceptional level of design quality that successfully integrates the proposed development into the surrounding area.</p>

The above table clearly outlines how the development proposal is envisaged to deliver on the key provisions of the Urban Design Manual.

We submit to the Board that the proposal is consistent with the objectives of the Sustainable Residential Development in Urban Areas (2009) / Urban Design Manual.

9.10 Delivering Homes Sustaining Communities (2007)



The Department's policy on housing provides the overarching policy framework for an integrated approach to housing and planning and notes that demographic factors will continue to underpin strong demand for housing. This in turn presents challenges for the physical planning of new housing and associated services. The quality of the housing environment is central to creating a sustainable community.

The *Delivering Homes Sustaining Communities* policy statement is accompanied by Best Practice Guidelines entitled 'Quality Housing for Sustainable Communities' and these are the focal point in terms of the consistency of the current proposal.

Quality Homes for Sustainable Communities (2007)

The purpose of these Guidelines is to promote high standards in design and construction and in the provision of residential development and services in new housing schemes. It is our considered view that the proposal for the site has delivered on the key principles of this document by delivering the following:

- Provides for the best use of an opportunely located site in close proximity to local amenities and public transport. Please refer to the description of the site in previous sections for further detail on this.
- The proposed development will provide a quality living environment for residents with apartments designed to meet or exceed standards and ample amenities and open space provided.
- Pedestrians and cyclists will be able to move to the site and connect with the surrounding area with reasonable ease and safety through the provision of linkages and infrastructure.
- The materials that have been selected will be easy to maintain and have excellent life cycle qualities.

A Housing Quality Assessment has been prepared by John Fleming Architects and submitted with this application. We direct the Board to consideration of this assessment for full details on the extent of proposals.

We submit to the Board that the proposal is consistent with the Delivering Home Sustaining Communities (2007) and the guidelines Quality Housing for Sustainable Communities (2007).

9.11 Guidelines for Planning Authorities on Childcare Facilities (2001)

Childcare Facilities

Guidelines for Planning Authorities

The Childcare Guidelines provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. The Guidelines are intended to ensure a consistent approach throughout the country to the treatment of applications for planning permission for childcare facilities.

The Guidelines identify a number of appropriate locations for childcare facilities, which include the following:

- New Communities/Large Housing Developments
- The vicinity and concentrations of workplaces, such as industrial estates, business parks and any other locations where there are significant numbers working
- In the vicinity of schools
- Neighbourhood, District and Town Centres
- Adjacent to public transport corridors, park and ride facilities, pedestrian routes, and dedicated cycle ways

The recommendation for new housing developments is the provision of 1 facility for each 75 dwellings. This will generally provide for 20 childcare spaces based on a requirement of 35 of such dwellings requiring childcare spaces. The guidelines state that 50% of units can be assumed to require childcare.

We confirm that the current proposal provides for a childcare facility of approx. 465sqm (gross internal floor area) that can facilitate up to 134 children. The specifics of the operation of this facility will be confirmed with any grant of permission. Section 9.14 below sets out how the proposal will comply with the 2018 Apartment Guidelines in regard to childcare provision.

We submit to the Board that the current proposal is therefore in compliance with the key objectives of the Guidelines for Planning Authorities on Childcare Facilities (2001).

9.12 The Planning System and Flood Risk Management (2009)



The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The purpose of the Guidelines is that Planning Authorities must implement the Guidelines in ensuring that where relevant, flood risk is a key consideration in the assessment of planning applications.

Preliminary investigations indicate that flood risk and stormwater impact is acceptable such that there will be no inappropriate risk of flooding arising from or an inappropriate residual flood risk to the proposed development, its occupants or users and adjoining properties. A Site Specific Flood Risk Assessment by JBA Consultants is attached to this application for the information of the Board.

We submit to the Board that the proposal is consistent with the Planning System and Flood Risk management Guidelines 2009

9.13 **Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)**

Appropriate Assessment of Plans and Projects in Ireland

Guidance for Planning Authorities

Under Article 6(3) of the EU Habitat Directive and Regulation 30 of SI no. 94/1997 “European Communities (Natural Habitats) Regulations (1997)” any plan or project which has the potential to significantly impact on the integrity of a Natura 200 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Acts (2000 - 2010).

An Appropriate Assessment Screening Report prepared by Malachy Walsh and Partners is submitted as part of this SHD planning application. It has been objectively concluded, during the screening process, that the Natura 2000 sites within the zone of potential impact influence of the proposed development, namely South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA or North Bull Island SPA, are not likely to be significantly impacted by the proposal considered in this report.

We submit to the Board that the proposal is consistent with the Appropriate Assessment of Plans and Projects in Ireland guidance for Planning Authorities and is in compliance with the key objectives of the Breeding Birds and Habitats Directive

9.14 Design Standards for New Apartments (2020)

Sustainable Urban Housing: Design Standards for New Apartments

Guidelines for Planning Authorities issued under
Section 28 of the Planning and Development Act,
2000 (as amended)

December 2020



‘Sustainable Urban Housing: Design Standards for New Apartments 2020’ are intended to promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term. The 2020 Apartment Guidelines replace the 2018 version and are updated to reflect the conclusions from the review of co-living and shared accommodation.

The current proposal provides for 242 no. residential units and this statement of consistency sets out the compliance of the proposal with the key policy requirements and standards as follows:

Specific Planning Policy Requirement 1

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).

Applicant Response to SPPR1

The proposed development mix is as follows:

- 96 no. 1 bed units (39.7%)
- 141 no. 2 bed units (58.3%)
- 5 no. 3 bed units (2.1%)

We submit the proposal is in compliance with the above SPPR given that the development will not exceed the 50% maximum for one bed units.

Specific Planning Policy Requirement 3

Minimum Apartment Floor Areas:

- *Studio apartment (1 person) 37 sq.m*
- *1-bedroom apartment (2 persons) 45 sq.m*
- *2-bedroom apartment (4 persons) 73 sq.m*

- *3-bedroom apartment (5 persons) 90 sq.m*

Applicant Response to SPPR3

The subject proposal complies with the minimum apartment floor areas as follows:

- 1 bed units 45 to 52.4sqm
- 2 bed units 73 to 86.2 sqm
- 3 bed units 95.7 sqm

We also note the majority of the apartments exceed the minimum floor area standard by a minimum of 10%. Please refer to the Housing Quality Assessment prepared by John Fleming Architects for more information on unit floor areas.

Specific Planning Policy Requirement 4

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

(ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.

Applicant Response to SPPR4

The site can be classified as a Central / Accessible location given proximity to centres of employment including higher education and surrounding land uses, distance to public transport and location in context of Tallaght Town Centre and therefore a standard of 33% applies.

A total of 117 no. of the 242 units proposed will have the benefit of dual aspect equating to 48.35% of the units. The dual aspect units are corner units with windows facing in two distinct directions to allow for access to light and cross ventilation. Any north only facing apartments are kept to a minimum with all units having more than one outdoor facing window direction.

The arrangement of the massing into 4 distinct blocks provides a large number of units which are positioned on a building corner, which allows for natural dual orientation.

An additional 24% (59 units) are provided with enhanced single aspect units where a projecting bay window is provided to enhance the level of sunlight and daylight accessible to individual units.

Given this, we submit the proposal compiles with the dual aspect ratio requirements of the Apartment Guidelines.

Specific Planning Policy Requirement 5

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

Applicant Response to SPPR5

The proposed floor to ceiling height of all floors of the buildings will be approx. 3.0 m with 4.3m heights proposed at ground floor level. We note the Guidelines state the following:

*“Building Regulations Technical Document F deals with Ventilation. It provides guidance on ceiling height in habitable rooms. The suggested minimum floor to ceiling height, consistent with good room design, the use of standard materials and good building practice is **generally 2.4m.**”*

Given this, we submit the proposal complies with the floor to ceiling height requirements of the Apartment Guidelines.

Specific Planning Policy Requirement 6

A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.

Applicant Response to SPPR6

The number of apartment units per core will vary per block. We can confirm that the number of apartments per floor per core will not exceed 12 no. with the highest number being 8 no. units. We refer An Bord Pleanála to the enclosed floor plans for detail on this.

Internal Storage

The Board will note that compliance with Guidelines is achieved in respect of storage to individual units in all units. All storage spaces are separated so no one space exceeds 3.5sqm. This highlights the overall design quality put forward.

No. of bedrooms	Minimum storage requirements	Proposed
1 bedroom	3 sqm	3 to 4.4 sqm
2 bedrooms	5 sqm (3 person) 6 sqm (4 person)	N/A 6.1 to 8.6 sqm
3 bedrooms	9 sqm	9.4 sqm

Please refer to the Housing Quality Assessment prepared by John Fleming Architects for further details on storage compliance.

Private Amenity Space

We submit that compliance with the minimum required areas for private amenity space is achieved in all units. We submit this is consistent with the design standards and is acceptable in this instance given the overall design quality put forward.

No. of bedrooms	Minimum floor areas for private amenity space	Proposed
1 bedroom	5 sqm	5.6 – 15.4 sqm
2 bedrooms	6 sqm (3 person) 7 sqm (4 person)	N/A 7.0 to 15.2 sqm
3 bedrooms	9 sqm	10.2 – 15.7 sqm

All balconies will meet or exceed the minimum depth requirement of 1.5 m.

Communal Facilities

The proposed development will provide for communal facilities in order to support residents and enhance the public realm aspect of the proposal. We note specifically that the following facilities are proposed:

- Ground Floor of Block D will accommodate a childcare facility (approx. 465 sqm). This facility is described in more detail in the following section - Available to the general public.
- Café at the ground floor of Block B & C (approx. 50.9 sqm). Available to the general public.

- Resident support services at the ground floor of Block B & C (approx. 252.4 sqm – including Studio room, lounge, lockers, parcel room). Residents only.
- A gym room at the ground floor of Block C (approx. 128.5 sqm). - Available to general public
- Co-working space of approx. 128.4 sqm at Ground floor of Blocks B & C - Available to general public

Childcare Facilities

The Apartment Guidelines require the provision of one childcare facility for every 75 dwelling units, subject to the proposed development mix and existing local childcare facilities.

It is also stated that *“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area.”*

In addition to this it clarifies that ***“one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.”***

The proposed development of 242 units provides for the following unit mix:

- 96 no. 1 bed units
- 141 no. 2 bed units
- 5 no. 3 bed units

Guidance on the provision of a childcare facility suggests that 1 facility (20 spaces) is required for every 75 units. It is evident from a review of planning policy that one bedroomed units are not considered to contribute to childcare demand under the Apartment Guidelines (2018). **Therefore, a total of 141 no. 2 bed units (with typically one child) and 5 no. 3-bed units have the potential to require childcare.**

The Childcare Guidelines (2001) have identified that only 50% of units will require childcare. The following requirements are therefore identified:

- 50% of 146 no. units = $146/2 = 73$ units

While the demand arising from the proposed development is marginally below the minimum requirement of 73 units, it is considered prudent to include a childcare facility as part of the proposed development.

Under the 2001 Childcare Guidelines, minimum floor space requirements per child are 2.32 sqm for 2-6 years and 2.00 sqm for afterschool care. This is exclusive of kitchen, bathroom and hall, furniture, or permanent fixtures.

The proposal will provide for a childcare facility (GFA approx. 465 sqm) at ground floor of Block D, accessible to all within the development and external users if necessary. Appropriate drop off and car parking will be provided to cater to this facility.

We therefore submit the proposed development is acceptable in addressing the anticipated demand that might arise from the proposed development.

Refuse Storage

The Apartment Guidelines requires that the storage and collection of waste materials be provided in apartment schemes. The Guidelines also state that *“Refuse facilities shall be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and types and quantities of receptacles required. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage and in-sink macerators are discouraged as they place a burden on drainage systems.”*

The waste storage areas shown in the architectural drawings have been strategically located within each block and are sufficiently sized. There will be sufficient space to allow for the segregation of waste into appropriately sized receptacles within minimal collection frequencies. A full Operational Waste

Management Plan by Awn Consulting is attached to this SHD application for the information of the Board and indicating how the subject proposal complies with relevant requirements.

Communal Amenity Space

We submit that the proposal fully complies with the minimum required areas for communal amenity space.

No. of bedrooms	Minimum floor areas for private amenity space	Required
1 bedroom	5 sqm	480 sqm
2 bedrooms	7 sqm	987 sqm
3 bedrooms	9 sqm	45 sqm
	Total required	1,512 sqm

We submit that approx. 1,797.4sqm of communal amenity space will be provided within the development which is above standard requirements. This accounts for approximately 13% of the site. The space can be broken down as soft landscaping, hard landscaping, seating areas, play areas, roof terraces and pedestrian paths.

A delineation of the Communal Open Space within the site is shown below.



In addition to the public open space proposed within the subject development site, more than adequate open space is provided within the bounds of the site to enhance the quality of the environment at this location.

Bicycle Parking and Storage

The Apartment Guidelines require that “planning authorities must ensure that new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions

in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.”

We submit that the proposal is an acceptable compromise on cycle parking standards in the County Development Plan and the apartment design guidelines for cycle parking as identified in the below table.

Minimum Requirement	Required	Proposed
1 cycle space per bedroom	392 cycle spaces	308 cycle spaces
1 visitor cycle space per 2 residential units	121 visitor cycle spaces	118 cycle spaces
Total	573 cycle spaces	568 cycle spaces

Car Parking

The Apartment Guidelines generally encourage reduced standards of car parking. The document defines accessible locations as falling into 3 categories:

- Central and/or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and/or Less Accessible Urban Locations

Our review of these 3 categories identified that the site can be categorised as a Central and/or Accessible Urban Location. This categorisation is made on the basis that the site is “within easy walking distance (i.e. up to 5 minutes or 400-500m) to / from high frequency (i.e. min 10 minute peak hour frequency) urban bus services. (Page 5)” and “within reasonable walking distance (i.e. up to 10 minutes or 800- 1,000m) to/from high-capacity urban public transport stops (such as DART or Luas)”.

With regard to car parking, the Apartment Guidelines set out the following requirements for Central and / or Accessible Urban Locations:

“Central and/or Accessible Urban Locations:

*In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, **the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances.** The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity.*

*These locations are most likely to be in cities, especially in or adjacent to (i.e. within 15 minutes walking distance of) city centres or centrally located employment locations. **This includes 10 minutes walking distance of DART, commuter rail or Luas stops or within 5 minutes walking distance of high frequency (min 10-minute peak hour frequency) bus services.***

We can confirm that the subject site is located within approx. 15-minute walk of Tallaght Town Centre, Tallaght Hospital and Tallaght University and 15min from the Kingswood and Belgard Luas stops. High frequency bus services are located at Greenhills Road and Belgard Road within 5min walk from the site. The very intention of the guidelines is to minimise, substantially reduce or wholly eliminate car parking for Central and/or Accessible Urban Locations. It is submitted that the subject site is a prime location for this principle to be applied.

A total of 136 no. car parking spaces are proposed to cater to the residential element of the proposed development (ratio of 0.56 spaces per unit). Given the accessible nature of the site and proximity to key public transport, the ratio of 0.56 is considered appropriate for the site. This is in line with recommendations as discussed with South Dublin County Council at pre-planning stage. The enclosed Traffic and Transport Assessment, prepared by NRB Consulting, set out further justification for this provision.

We submit to the Board that the proposal is consistent with the overall principles of the Sustainable Urban Housing: Design Standards for New Apartments (2020)

9.15 Urban Development and Building Height Guidelines (2018)



The 'Urban Development and Building Heights, Guidelines for Planning Authorities (2018)' are intended to set out national planning policy guidelines on building heights in relation to urban areas. These guidelines are the most recent form of guidance from the Minister on the matter of building height and were formally adopted in December of 2018. The competent authorities are obliged to consider the content of these guidelines in consideration of the matter of building height.

Section 1.14 of the document sets out the following:

*"Accordingly, where SPPRs are stated in this document, **they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes.** Where such conflicts arise, such plans/schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements."*

Notwithstanding, the content of the Tallaght LAP and specifically Section 3.5 'Broomhill', which the current proposal generally complies with, the Urban Development and Building Height Guidelines are the predominant context for assessment of height in this case.

From the outset, it is noted that the Building Height Guidelines (2018) expressly seek to increase building heights at appropriate urban locations and adjacent to key public transport corridors.

Policy Context

Furthermore, we note that the Guidelines states that in relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility. Planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:

- Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?
- Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?
- Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?

As a response to the above criteria, we note the following:

- As set out in this report, the proposal secures the relevant objectives of the National Planning Framework.
- The proposal generally accords with the Tallaght Local Area Plan 2020. The LAP recommends heights of between 3-6 storeys for residential development at the subject site. The proposed scheme is a range of heights from 4-7 storeys with only Block D fronting Broomhill Road extending to 7 storeys at the corner of the block, which is considered a positive urban design element. Please refer to Section 10 for analysis of SDCC Policy.

Specific Planning Policy Requirements

The following Specific Planning Policy Requirements are considered particularly relevant to the current site context and the compliance of the scheme with these SPPRs is set out below.

SPPR 3 (A)

“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 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.”

Applicant Response to SPPR 3A

The performance of the proposal vis a vis the building height criteria is further assessed below in sub-section ‘Development Management Criteria’.

Development Management Criteria

The Guidelines clearly set out that in the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/An Bord Pleanála, that the proposed development satisfies a number of criteria. The relevant criteria, followed by an applicant response is set out below to clearly set out for An Bord Pleanála that the current proposal qualifies as a site that can accommodate additional building height:

Table 9-2 Development Management Criteria

At the scale of the relevant city / town	
Assessment Criteria	Response
<i>“The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.”</i>	<p>The site is well served by excellent public transport and cycle connections to and from the surrounding area. The site is within 1km of the Belgard and Kingswood LUAS stops. There are a number of bus routes within easy walking distance of the site which provide connections to key location such as Tallaght, Dun Laoghaire, UCD and Dublin City Centre.</p> <p>The site is also within a 10 minutes’ walk from a number of employment centres including Tallaght Town Centre and Technical University Tallaght which will be directly linked to this accommodation proposal.</p>
Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	The proposal is not located within an architectural sensitive area. However, careful consideration has been given to the successful integration of the scheme into the existing character and topography of the site and area. The Landscape and Visual Impact Assessment prepared by Park Hood, enclosed with this application, confirms the proposal, while substantial, would result in a positive contribution to the character and urban fabric of this area in terms of landscape character and quality due to both the low sensitivity, quality and nature of the existing site and the proposed revitalisation and new architectural character.
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.”	Park Hood confirm in their assessment that the proposed development would not reduce the visual amenity of the surrounding area: <i>“While recognising there are some significant local impacts the opinion is, on balance, that this proposal has no unacceptable townscape / landscape or visual effects and can be successfully absorbed into the character of this part of Dublin”.</i>
At the scale of district/ neighbourhood/ street	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.	The proposal responds to the natural and built environment for the reasons set out under the response to ‘at the scale of the relevant city/town’ above. Careful consideration has been given to the proposal in regard to how it addresses this industrial/regeneration area, the streetscape, the neighbouring properties and surrounding development. The high quality design submitted provides an appropriate transition between the neighbouring sites, whilst delivering on

	appropriate street frontage along Broomhill Road.
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	Careful consideration has been given to ensure that a monolithic appearance is avoided. Different materials, fenestration and massing of the building will break up the building and create interest. The stepping down in height of the building allows for this elevation to be broken into separate ‘buildings’ through materials and elevational treatment. We refer the Board to the Architectural Design Statement prepared by John Fleming Architects enclosed herewith for further details.
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).	There is no inland waterway or marine frontage within the current proposal. We can confirm that the attached Flood Risk Assessment has concluded that there will be no inappropriate flood risk as a result of the proposal. A detailed proposal is put forward to include enhance public spaces including at the entrance and within the central courtyard of the site that will result in an enhanced public realm at this location.
The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.	The high-quality design proposed will ensure that the development will be legible and attractive when viewed from the wider area. Internally, the site provides pedestrian and cyclist linkages which integrates the development.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.”	The appropriate mix of unit types and sizes will be incorporated into the proposed development in order to contribute to a currently limited market for this type of housing. The mix of 1, 2 and 3 bed apartment units will be broken down into a number of unit types to provide variety and options for future residents.
At the scale of the site/building	
The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.	<p>A detailed design rationale for the form, massing and height of the proposed development is set out in the enclosed Architectural Design Statement by John Fleming Architects. In addition, the Daylight/sunlight analysis demonstrates that all of the assessed units comfortably meet the BRE guidelines on average daylight factor.</p> <p>The design of the subject scheme, particularly the orientation of the blocks was carefully considered to minimise the potential for overlooking and overshadowing of each other.</p>

<p>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings - Part 2: Code of Practice for Daylighting'.</p> <p>Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution</p>	<p>The Daylight and Sunlight Assessment prepared by 3D Design Bureau, enclosed herewith, confirm that there are acceptable levels of access to natural daylight and overshadowing is minimised. In these assessments appropriate regard is given to the relevant daylight provision guides and we therefore consider the proposal to be acceptable in this regard.</p> <p>There is therefore no requirement for compensatory design solutions beyond what is proposed in the scheme in terms of a breakdown in massing, appropriate balcony depths and substantial areas of glazing to allow adequate light penetrate into each unit.</p>
Site Specific Assessment	
<p>Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.</p>	<p>A full analysis of the microclimate was not considered necessary for this planning application given the block format and building heights in the subject proposal.</p>
<p>In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.</p>	<p>The appointed ecologists, Malachy Walsh and Partners, have prepared the appropriate assessments and documentation as part of this application to An Bord Pleanála. An AA screening report and separately an Ecological Impact statement and Bat Survey are submitted with this application. The possibility that the subject development may have a significant impact on Natura 2000 sites may be excluded in this instance. Relevant design criteria such as appropriate glazing is incorporated where necessary to avoid impacts on bird flight paths.</p>
<p>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links</p>	<p>As the subject buildings are not considered to be of significant height this assessment is not required in this instance.</p>
<p>An assessment that the proposal maintains safe air navigation.</p>	<p>An Aeronautical Assessment by O'Dwyer and Jones Design Partnership is attached to this application for the information of the Board. The assessment concludes that the subject proposal will not have any adverse effects on surrounding</p>

	aviation nodes including Weston Aerodrome and the Tallaght University Helipad.
An urban design statement including, as appropriate, impact on the historic built environment	<p>An Architectural Design Statement has been prepared by John Fleming Architects and is enclosed. There are no Protected Structures onsite and the site is not located within an Architectural Conservation Area.</p> <p>We also refer the Board to the Townscape and Visual Impact Assessment prepared by Park Hood confirming that there is little potential for the proposal to have a negative impact on protected structures in the surrounding area.</p>
Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	The relevant environmental assessments have been considered. We note as per the EIAR Screening Statement enclosed here with an EIAR is not required. Full environmental assessments, such as an AA Screening Report and Ecological Impact Assessment have been prepared by qualified ecologists, Malachy Walsh and Partners, and are attached to this SHD application.

It is in consideration of the above that the current proposal for 4 to 7 storeys in height can be positively considered by the competent authority. Specifically, the proposal has addressed the specific development criteria requirements of the Guidelines and is in compliance with the key SPPRs. Most notably the site's location is considered to address the very spirit and intent of the Guidelines that being one proximate to public transport with high frequency services. The current site is therefore appropriate for increased building height and residential densities and being just a single storey above the heights recommended in the Tallaght LAP at the corner of Block D and not even for the full floor of the block, is considered appropriate at this location.

We submit to the Board that the proposal is consistent with the Urban Development and Building Height Guidelines for planning authorities (2018)

9.16 Design Manual for Urban Roads and Streets (DMURS) (2013)

A key objective of the Design Manual for Urban Roads and Streets (DMURS) is to achieve safe, attractive and vibrant streets by balancing the needs of all users, and prioritising alternatives to car journeys. The manual advocates a design-led approach, which takes account of both the physical and social dimensions of place and movement. The Engineering Services Report and Traffic Impact Assessment prepared by NRB, Consulting Engineers provides further detail in respect of the compliance of the proposed development with DMURS, which is discussed below also. The following measures have been adopted in compliance with DMURS:

- Pedestrians and cyclists accommodated
- Minimum footway widths achieved
- Corner Radii minimised
- Shared Surfaces provided to maximise place value

9.17 Conclusion

We trust the foregoing provides the Board with a comprehensive review of Strategic Planning Policy as it relates to the subject proposal and provides a robust illustration of how the subject proposal is consistent with relevant policies and objectives as they relate to compact, urban regeneration sites at suitable locations.

10 Local Planning Context

In addition to the above, the relevant statutory policy for consideration in this Statement is the South Dublin County Development Plan 2016-2022 and Tallaght LAP 2020.

It is also recognised that the Draft South Dublin County Development Plan 2022-2028 has been published and regard is given to this document within this Statement of Consistency. Our initial review of the proposal suggests that the current proposal is consistent with the provisions of this document.

The applicant however recognises that the predominant context for the review of the scheme vis-à-vis the currently operational and formally adopted plan, that being the South Dublin County Development Plan 2016-2022 and the Tallaght Local Area Plan (LAP) 2020.

10.1 South Dublin County Development Plan 2016-2022



The South Dublin County Development Plan 2016-2022 is the relevant statutory planning context for the subject site. This Plan will remain valid for 6 years, subject to any review, variations, extensions, or alterations made during the lifetime of the permission.

The consistency of the proposed development with the key policies, objectives and standards of the County Development Plan is set out below.

10.1.1 Zoning

The subject site is identified below:

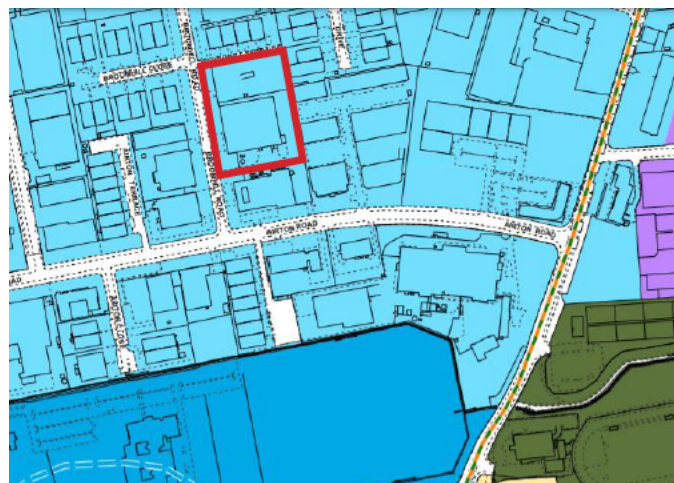


Figure 4 - Subject Site Zoning

The subject site is **zoned REGEN** under the current County Development Plan. The objective is “To facilitate enterprise and/or residential-led regeneration”.

The subject development, proposing much needed residential accommodation, fulfils this objective. Under the REGEN Zoning, Residential, childcare facility and café/restaurant are all permitted in principle.

10.1.2 REGEN Policies and Objectives

The SDCC vision for this zoning is as follows:

‘New Regeneration zoning objective ‘REGEN’ has been introduced to support and facilitate the regeneration of underutilised industrial lands that are proximate to town centres and/or public transport nodes for more intensive enterprise and residential led development.’

As previously stated, the subject proposal will act as a catalyst, within the area, to support and promote residential led development. The site is opportunely located, close to Tallaght Town Centre and high frequency transport links, to support this vision.

Core Strategy

‘The Core Strategy identifies capacity for approximately 40,150 housing units in the County to 2022. Consolidation and sustainable intensification in established urban and suburban areas, through infill development and brownfield redevelopment on ‘REGEN’ zoned lands, is a priority.’

‘To promote the regeneration of underutilised industrial areas in a manner which enhances the local economy and encourages a sequential approach to development;’

The Regen Zoned lands are specifically reflected in the Core Strategy and therefore the application for residential development at this location is in full compliance with the Development Plan.

The following Development Plan objectives are relevant in this instance. The documentation, provided as part of this application, demonstrates how our proposal meets and can deliver on the Council’s vision for the area.

Objectives

CS1 Objective 2: *To promote and support the regeneration of underutilised industrial areas in areas designated with Zoning Objective Regeneration ‘REGEN’ (to facilitate enterprise and/or residential led development).*

Applicant comment: Residential development is being proposed in this instance.

CS2 Objective 4: *To promote and support the regeneration of underutilised industrial areas within areas designated with Zoning Objective Regeneration ‘REGEN’ (to facilitate enterprise and/or residential led regeneration).*

Applicant comment: Residential development is being proposed in this instance.

H8 Objective 4: *To support proposals for more intensive enterprise and/or residential led development within areas designated with Zoning Objective ‘REGEN’ (To facilitate enterprise and/or residential led regeneration), subject to appropriate design safeguards and based on traditional urban forms that adhere to urban design criteria.*

Applicant comment: Residential development is being proposed in this instance.

ET2 Objective 2: *To support proposals for more intensive compatible enterprise and/or residential led development on lands designated with Zoning Objective ‘REGEN’, subject to appropriate design safeguards and based on a traditional urban form that adhere to urban design criteria.*

Applicant comment: Residential led development with a complementary mix of uses is being proposed in this instance with full compliance with the relevant design criteria, and detailed site analysis to provide a development that is appropriate to the surrounds and reflects the transitional nature of the area.

10.2 SDCC Development Guidance – Regen Zones

Development proposals in Regeneration (REGEN) zones should address the following criteria:

- (1) *Demonstrate a clear transition towards a more urban form of development and a traditional street network. Address connectivity and linkages in the area and demonstrate that the development of the site would not*

give rise to isolated piecemeal pockets of residential development that are disconnected from shops, amenities and/or other residences.

Open space, transport links, convenience shopping and leisure facilities are all within walking distance of the proposed development.

Tallaght Hospital

The subject site benefits from close proximity to the Tallaght Hospital which is 1.6km (21 min walk) from the site.

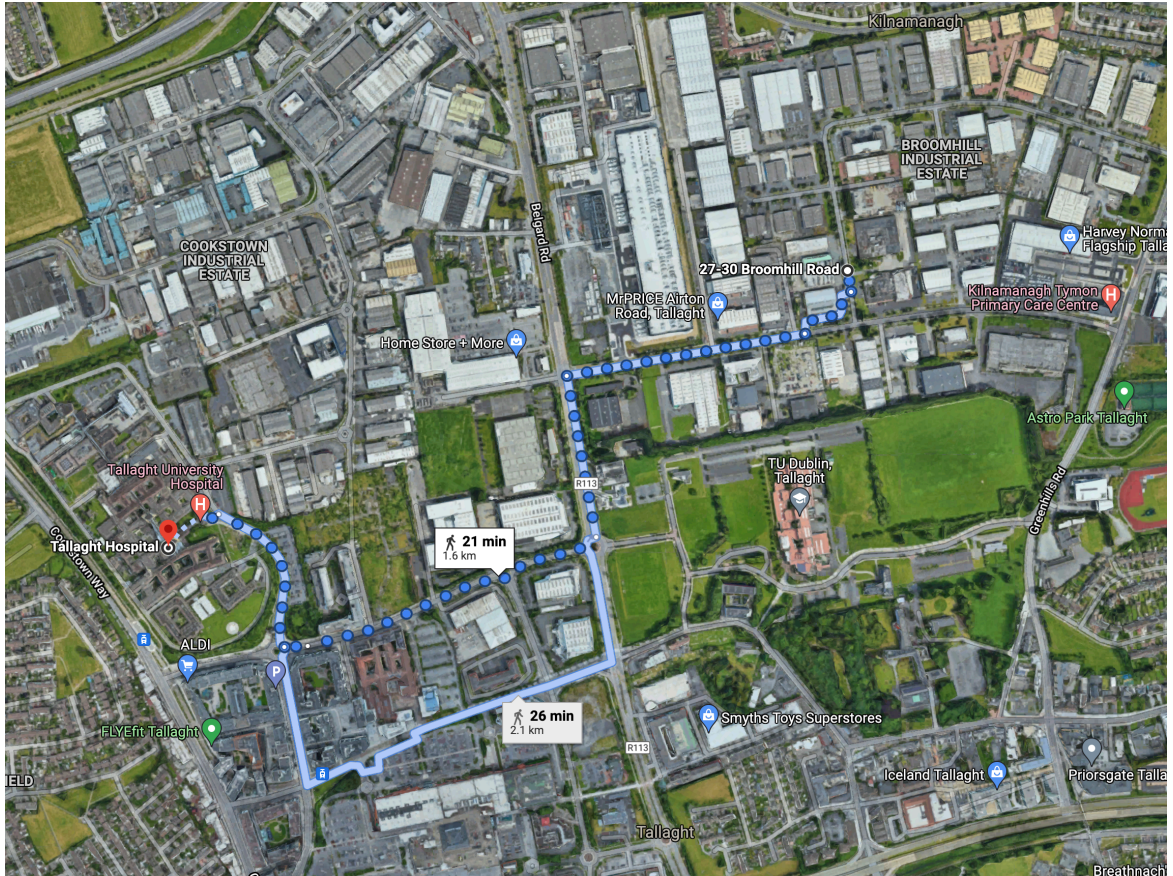


Figure 6 – Distance to Tallaght Hospital

Technical University Dublin, Tallaght

The IT Campus is located south of the subject site, approximately 950m away (12min walking distance).

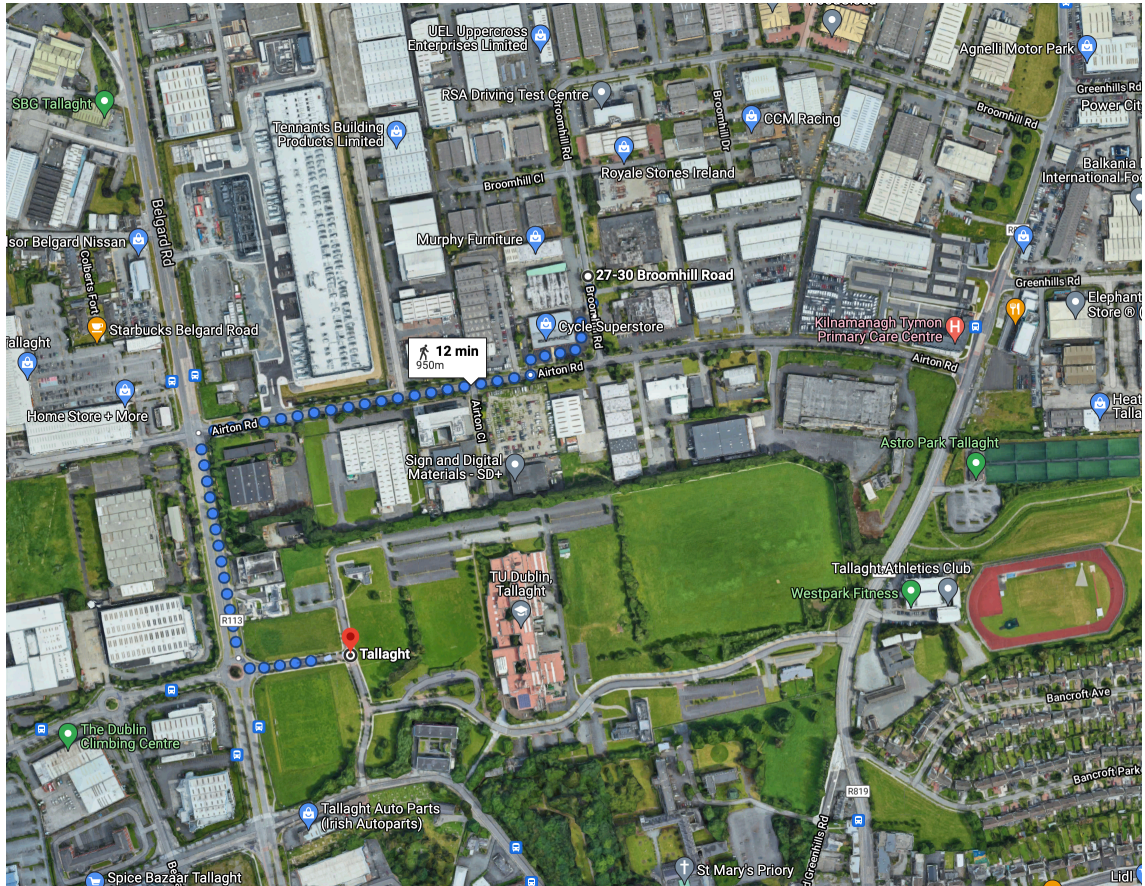


Figure 7 – Distance to Tallaght IT

Luas Belgard and Luas Kingswood

The subject site is conveniently located within a 1km walking radius of the Luas Stop at Belgard and at Kingswood, to the north.

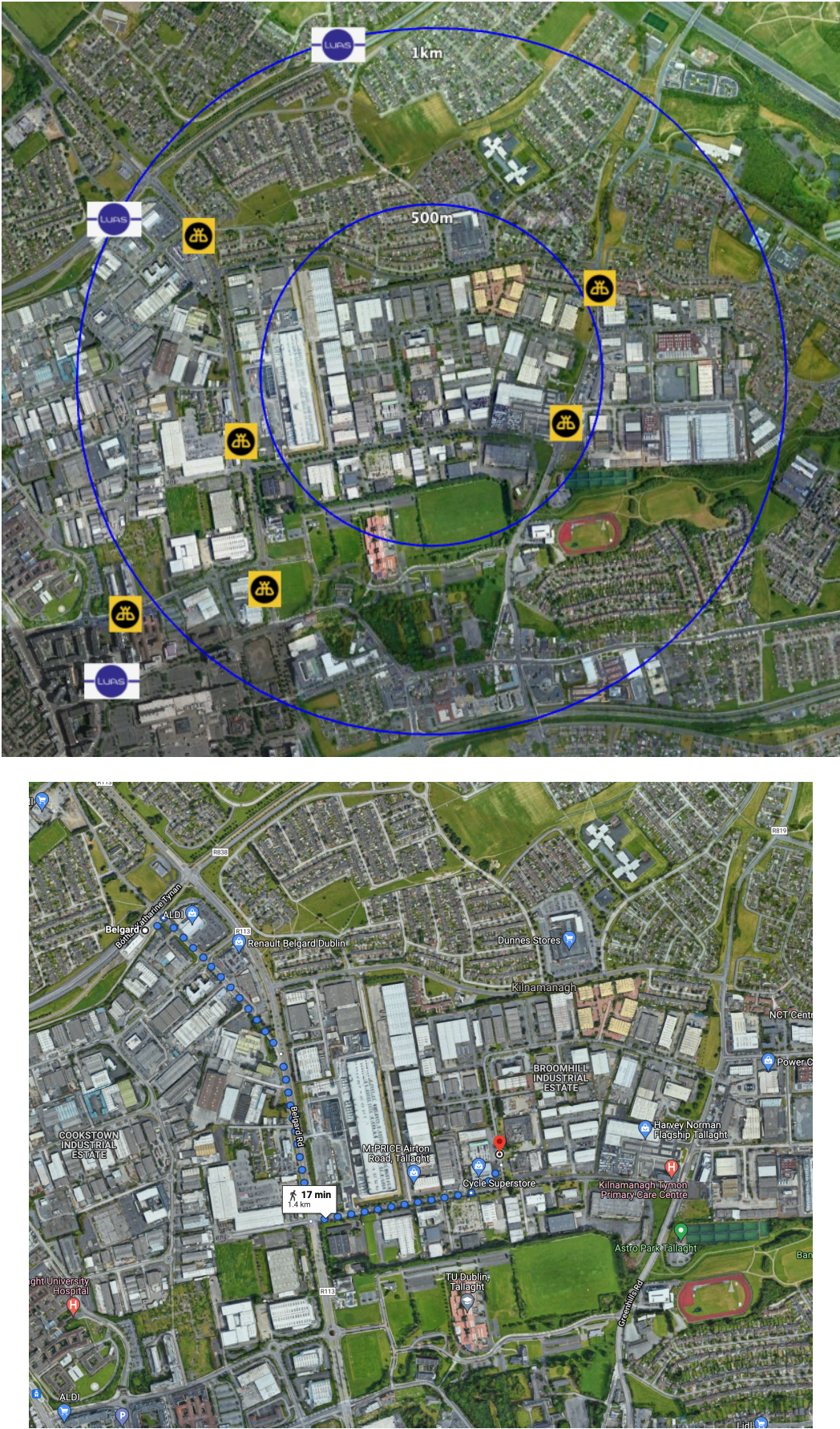


Figure 8 – Distance to Luas Belgard

As shown above, significant employment centres including Tallaght Hospital, TU Dublin - Tallaght, and The Square are also in immediate proximity to the site.

Any vacant sites adjoining our site should also be noted although it is understood at this stage that the majority of uses in the surrounding area are established commercial/light industrial uses that will not become available for any significant development/regeneration in the short term. We confirm that the development scheme has been designed so that it does not prejudice the development potential of these sites however the regeneration of the subject site is seen as a high priority to instigate the level of regeneration envisaged within the Tallaght LAP.

It is our submission that the proposal represents an appropriate form of development which will not prejudice the development potential of any adjoining sites and is a natural extension of emerging residential land use to the south of Airton Road.

- (2) Residential development should not be introduced at ground floor level adjacent to busy roads, and/or roads that are subject to significant movements by Heavy Goods Vehicles (HGVs).

We submit that the scheme sets back from the road at Broomhill Road and allows for appropriate separation distance from the road.

Every effort has been made to provide a landscaped buffer zone between ground floor uses and the edge of the site. The amenity facilities of the proposed development are mainly located at ground floor level of Blocks B, C and D, in order to address the road frontage. The ground floor layout at Broomhill Road is shown below.

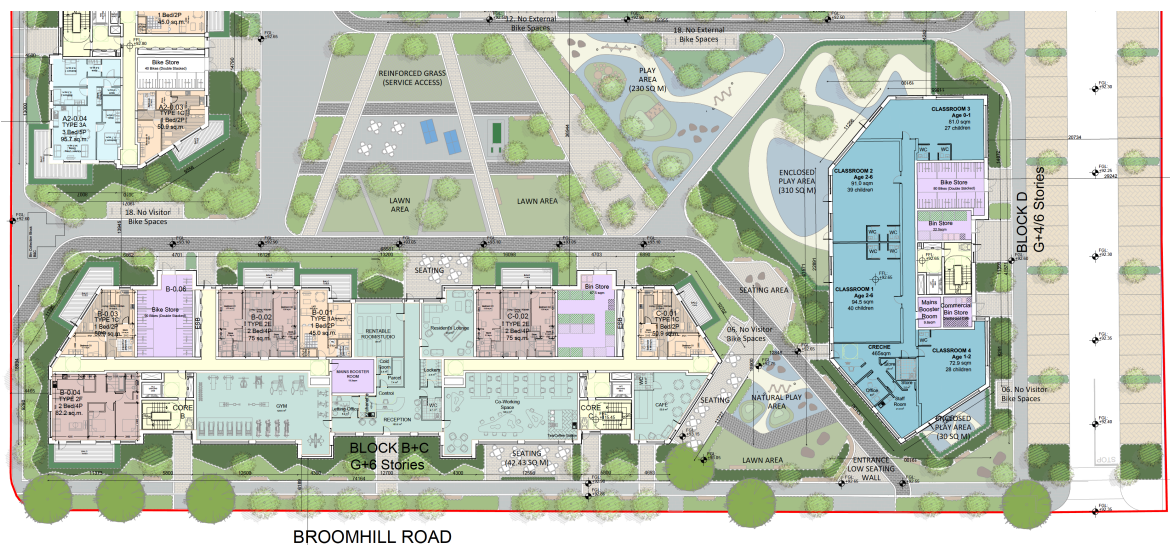


Figure 9 – Ground Floor Layout fronting Broomhill Road

- (3) Given the transitional nature of Regeneration zones, precautions will be taken to ensure that the potential for noise pollution, air pollution or other nuisance from established industrial uses will not exceed acceptable environmental standards. The Planning Authority may seek a report from a suitably qualified person to identify and quantify sources of noise pollution, air pollution, or nuisance, assess the potential impacts on the proposed development and provide a series of recommendations to mitigate the impacts of any pollutants insofar as possible (e.g. orientation and layout of dwellings, positioning of openings and insulation).

We have carried out a preliminary assessment of this issue and the design has been adapted accordingly to include buffering of the open space areas and improving the performance of the building envelope. Awn Consulting have undertaken a noise assessment of the proposal in the context of the surrounding uses that

are existing. Standard construction practices and use of appropriate materials are considered sufficient to adequately mitigate any potential noise impacts.

- (4) *It may be necessary to consider improvements to the surrounding road and street network in conjunction with the Planning Authority, to calm traffic and improve pedestrian and cyclist access.*

We submit that an improved and dedicated access point linking Broomhill Road and the development site will be provided as part of this planning application in order to provide a safe access and egress to the site.

10.3 Height

The South Dublin County Council Development Plan 2016-2022 has noted that there has been a shift towards more compact and sustainable forms of development over the past two decades which has resulted in increased building heights in the County. Varied building heights are being supported across residential and mixed use areas in South Dublin County to promote compact urban form, a sense of place, urban legibility and visual diversity.

The following policies have been created to support this initiative for increased height and density in residential housing. H9 Objective 1, 2 and 4 are specific to the subject site as this regeneration area has been recommended for increased height within the Tallaght Local Area Plan 2020.

HOUSING (H) Policy 9 Residential Building Heights
It is the policy of the Council to support varied building heights across residential and mixed use areas in South Dublin County.
H9 Objective 1: To encourage varied building heights in new residential developments to support compact urban form, sense of place, urban legibility and visual diversity.
H9 Objective 2: To ensure that higher buildings in established areas respect the surrounding context.
H9 Objective 3: To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing (see also Section 11.2.7 Building Height).
H9 Objective 4: To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centres, Mixed Use Zones and Strategic Development Zones and subject to an approved Local Area Plan or Planning Scheme.
H9 Objective 5: To restrict general building heights on 'RES-N' zoned lands south of the N7 to no more than 12 metres where not covered by a current statutory Local Area Plan.

10.4 Density

The South Dublin County Council Development Plan 2016-2022 states that higher residential densities will be promoted within walking distance of town and district centres and high capacity public transport facilities. In accordance with Departmental Guidance, the residential density (net) of new development should generally be greater than 35 dwellings per hectare. This document also states to refer to the Sustainable Residential Development in Urban Areas(2009) document.

The Sustainable Residential Development in Urban Areas(2009) document states that increased densities should be encouraged on residentially zoned lands and particularly in the following locations:

- City and Town Centres
- Brownfield Sites within City and Town Centres
- Public Transport Corridors
- Inner Suburban / Infill Sites

As the site at Broomhill Road is a brownfield, suburban, infill site which is in proximity to multiple transport corridors a higher proposed density of 172 Units/Ha is deemed appropriate.

10.5 Housing Mix

South Dublin County Council note that it recognises in the below policy the need to provide a range of housing types in all residential developments and to meet different categories of housing need. This proposal for 242 no. residential units which ranges from 1 bed apartments to 3 bed apartments accommodating a maximum of 5 people. This proposal also includes the required 10% of units for Part V use which have been identified by John Fleming Architects as being located in Block A. This proposed scheme therefore provides an adequate mix of housing for the surrounding area.

HOUSING (H) Policy 10 Mix of Dwelling Types

It is the policy of the Council to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of the Interim South Dublin County Council Housing Strategy 2016-2022.

H10 Objective 1:

To ensure that new residential developments provide for a wide variety of housing types, sizes and tenures in line with the Interim South Dublin County Council Housing Strategy 2016-2022.

10.6 Plot Ratio

The Local Area Plan confirms that indicative Plot Ratio for 'Regen' sites is 0.75 - 1:1 (high) is permissible with the current plot ratio approximately 1.6 we consider this to be acceptable. Section 2.6.1 of the LAP states that 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.

"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."

A **significant public gain** includes:

- The dedication of part of the site for public open space including parks and plazas, above the standard 10% requirement for public open space on site.
- The creation of streets and links that provide access through and access to a site.
- Major upgrades to streets surrounding the site including works such as street widening, new enhanced junctions and crossing points and realignments.
- Provision of community and/or cultural amenities that will significantly contribute to the social infrastructure in the area; and/or
- Other public domain works or improvements to be agreed with the Council."

The proposed plot ratio of 1.6 (maximum) exceeds the maximum stated figure of 1.0 and flexibility relating to gross floor area of up to 20%. However, several key planning gains are provided, and we ask the Board to consider the following on a case-by-case basis:

- The public open space provision in the form of landscaped courtyard and plaza opening out onto Broomhill Road from the proposed Café equates to 10% of the site area in line with standard requirements. A further 13% of the site is provided for communal open space in the form of pathways, seating, courtyard areas and rooftop terraces.
- Road and streetscape upgrade works are proposed at Broomhill Road at the entrance to the site, including new planting improving the quality of the public realm for all road users.
- Additional future connections to blocks north and east of the subject site can be accommodated in future if necessary and are provided for in the subject scheme.
- The proposed scheme will maximise the use of this brownfield site that is located within a high quality, evolving area that is well connected to surrounding amenities and public transport
- Additional gym, co-working space and Café are provided within the scheme that will contribute significantly to the social infrastructure of the area;

A new shared vehicular and pedestrian access road is proposed to the west of the site, enhancing, and promoting permeability with adjoining sites, as the wider area develops in the future.

10.7 Transport

The subject site is located within Zone 2 of the County given it is within 500 metres of regular bus services and is close to the Square and other amenities in the locality.

The following standards apply to car parking requirements within Zone 2.

Car Parking

Use	Requirement
Residential	0.75 per apartment dwelling 1-bed 1 per apartment dwelling 2-bed

However, these standards are considered maximum and therefore there is a possibility of a reduction in the number of spaces under the development proposal, particularly given the apartment design guidelines discussed below. A current ratio of 0.56 spaces per unit is proposed that provides 136 car parking spaces which is considered appropriate given the proximity to public transport and alternative cycle parking spaces provided.

Bicycle Parking

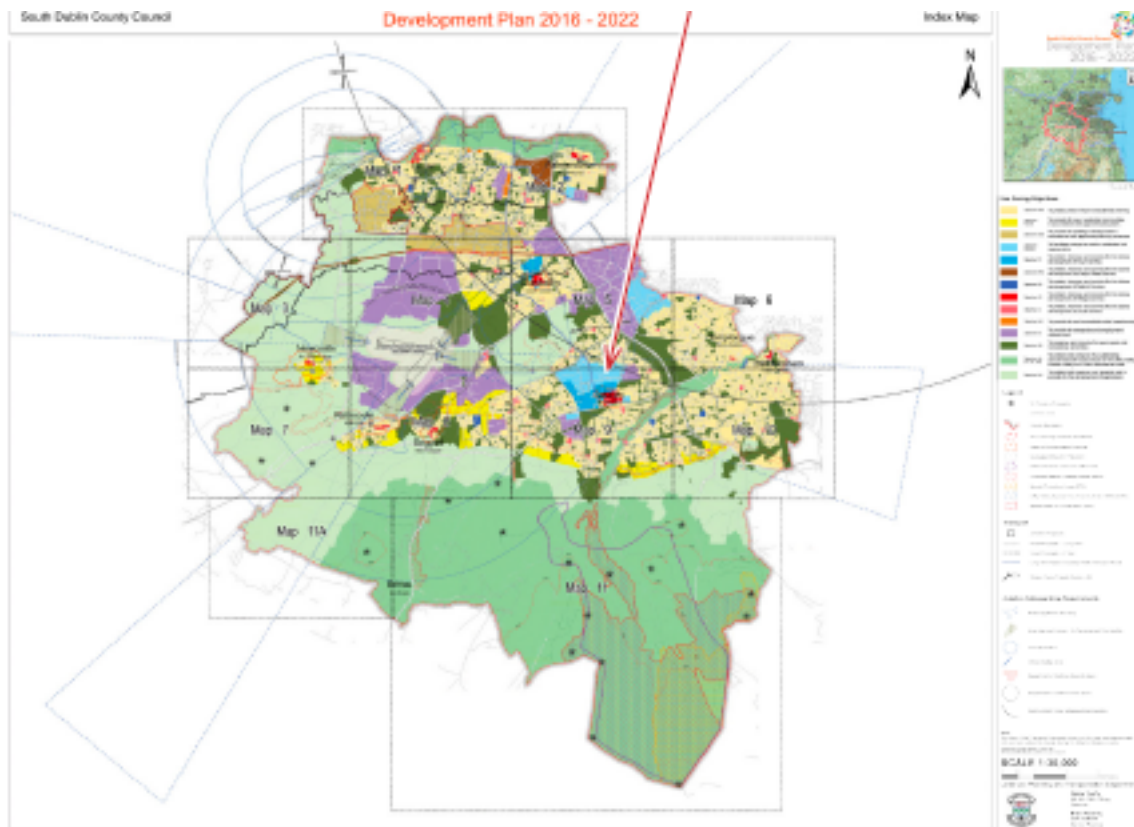
Use	Requirement
Residential	1 long stay per 5 apartments 1 short stay per 10 apartments

As with car parking, alternative cycle parking standards are required by the Apartment Design Guidelines. A significant number of cycle parking spaces are provided in the subject proposal with 426 provided at safe, secure, and covered spaces at surface level and within bike stores within the central courtyard space and within each block.

10.8 Aviation

Section 7.8 of the South Dublin County Development Plan 2016-2022 provides guidance on restrictions and requirements for development within the catchment zones of the Dublin Airport, Casement Aerodrome and Weston Aerodrome.

The subject site is not located within the Conical Surface of any of the aforementioned aerodromes or airports as illustrated by the red arrow below.



An aeronautical assessment carried out by O'Dwyer and Jones Design Partnership has concluded that the proposed site complies with all aviation and aeronautical requirements affecting the site and therefore the proposal is in compliance with any requirements in relation to aviation planning including the Tallaght hospital Helipad. We refer the Planning authority to the attached report by O'Dwyer and Jones for full details.

10.9 Open Space

Communal Open Space

The South Dublin County Council Development Plan 2016-2022 has clear requirements with regards to the provision of communal open space within new apartment developments. The table below indicates the current standards for this.

TYPE OF UNIT	APARTMENTS	PRIVATE OPEN SPACE	COMMUNAL OPEN SPACE	STORAGE
Studio	40 sq.m	4 sq.m	4 sq.m	3 sq.m
One Bedroom	45 sq.m	5 sq.m	5 sq.m	3 sq.m
Two Bedroom	73 sq.m	7 sq.m	7sq.m	6 sq.m
Three Bedrooms	90 sq.m	9 sq.m	9 sq.m	9 sq.m

The obligation for communal open space within this scheme is 1,512sqm. The proposed communal open space exceeds this requirements through the implementation of a central courtyard and rooftop terraces to provide a total of 1,797.4sqm.

Public Open Space

The South Dublin County Council Development Plan 2016-2022 has the following requirement regarding public open space.

(iii) **Public Open Space/Children's Play**

The Planning Authority will require public open space to be provided as an integral part of the design of new residential and mixed use developments.

- A detailed Landscape Plan that outlines the extent of open space and details for its treatment will be required with residential developments of 10 units and above.
- In areas that are designated Zoning Objective RES-N all new residential development shall be required to incorporate a minimum of 14% of the total site area as public open space;
- In all other zones all new residential development shall be required to incorporate a minimum of 10% of the total site area as public open space. This includes community led housing for older people in established areas on lands designated with Zoning Objective "OS" (To preserve and provide for open space and recreational amenities).

This 10% requirement for public open space within this development has been exceeded through the use of a courtyard space and play areas at ground level. A total of 1400sqm is proposed which is in line with Development Plan requirements.

10.10 Tallaght Town Centre Local Area Plan 2020

The Tallaght Town Centre Local Area Plan came into effect on 20th July 2020. The LAP includes several objectives for the development of the area and divides the LAP boundary into 8 different precincts with the subject site being located within the Broomhill Area. The land use mix/function of the Broomhill Area is as follows:

"Predominantly business, enterprise and employment area with more mixed-use residential development fronting along the southern side of Airton Road, subject to integrating effectively with existing surrounding uses."

The subject site has been vacant for a number of years with no identifiable commercial tenant available. The site has therefore been identified as more appropriate for residential use, in compliance with the REGEN zoning for the site that allows both enterprise or residential led regeneration within this zone. As identified in the attached response to opinion document and attached Economic and Social Audit, there is adequate provision for a range of commercial and employment uses in the surrounding area that are not significantly diluted by the subject proposal.

As identified in previous sections the subject proposal is generally in accordance with the plot ratio and height requirements within this precinct and seeks to provide further enhancements to the public realm through the provision of housing for a range of age groups, improved connections, provision of necessary water and waste water infrastructure, provision of sustainable drainage systems within the scheme, delivery of high quality landscaping, a new childcare facility and additional facilities for the local area.

The subject proposal is therefore considered to be consistent with the objectives of the Tallaght LAP by providing much needed regeneration, housing supply and upgrades to necessary infrastructure in the area while also providing a mix of employment generating uses in the form of the proposed gym, café and creche.

Building Heights

With regard to appropriate heights, the Tallaght Local Area Plan 2020 is the appropriate context to consider the subject site. The subject site is located along a secondary frontage where 4-6 storeys residential are generally permitted.

The subject site is located within the Broomhill block of the Tallaght LAP that permits a building height of 4-6 storeys residential or 3-5 commercial.

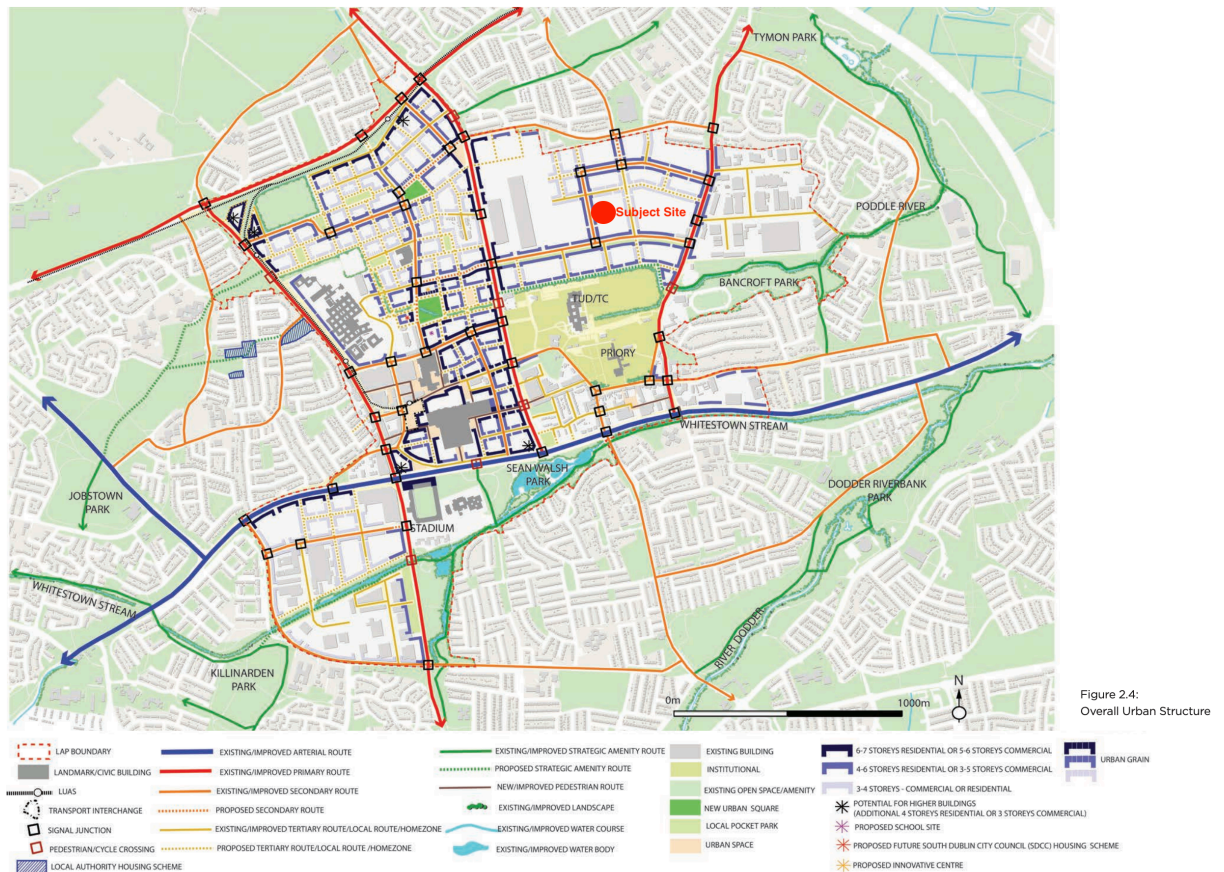


Figure 2.4:
Overall Urban Structure

Overall Urban Structure (Broomhill site shown as red dot) – Tallaght LAP 2020

Ground floor to ceiling heights are recommended between 2.4m for upper floors and 2.9m for ground floors of residential developments. It is anticipated the subject proposal will be in the range of 6-7 storeys (Max) in height which is in excess of the recommended limit but is consistent with the national policy mandate to allow increased building height at suitable locations that will provide an appropriate density for infill sites that are well serviced by public transport and local amenities. The proposed height is generally in accordance with the requirements of the LAP with heights of 4-6 storeys with only the corner of Block D and front facing blocks (Block B/C) including an increased height of 7 storeys. This is appropriate from an Urban Design perspective. Heights within the block are recommended at 3-4 storeys in height for commercial and residential land uses with the subject proposal retaining the 4 storey height for much of the internal blocks with some elements extending to 5 storeys.

The increased height is discussed further under the Building Height Guidelines discussed in section 8. A Material Contravention Statement is submitted as part of this planning application to justify the proposed height in the context of Section 28 Ministerial Guidelines.

Objective BH1

The Tallaght Local Area Plan 2020 included key objectives for the Broomhill area. The most notable of which being Objective BH1.

BH1: Transition to mixed use area primarily focussed on higher value commercial uses

The proposed scheme at Broomhill Road supports this objective as it integrates multiple commercial uses within Blocks B, C & D including a gym, a co-working space, a café and a creche. These facilities address Broomhill Road and will service both the new community and general public.

Sequencing of Development in Regeneration Zoning

Section 8.2.1 of the Tallaght Local Area Plan 2020 requires a proposal for regeneration lands to address the following criteria.

1. *Demonstrate a clear transition towards a more urban form of development and a traditional street network in accordance with Chapter 2 and 3;*
2. *Address connectivity and linkages in the area and demonstrate that the development of the site would not give rise to isolated piecemeal pockets of development with residential uses that are disconnected from public transport, public realm, retail, amenities and/or other residences;*
3. *Residential development should be very carefully designed at the lower levels in particular adjacent to existing busy roads, and/or roads that are subject to significant movements by Heavy Goods Vehicles (HGVs) without demonstrated or proposed improvements to upgrade the street network in accordance with the Plan;*
4. *Demonstrate that the potential for noise pollution, air pollution or other nuisance from established industrial uses will not exceed acceptable environmental standards. The Planning Authority may seek a report from a suitably qualified person to identify and quantify sources of noise pollution, air pollution, or nuisance, assess the potential impacts on the proposed development and provide a series of recommendations to mitigate the impacts of any pollutants insofar as possible (e.g. orientation and layout of dwellings, positioning of openings and insulation); and*
5. *As part of any planning application for redevelopment, the developer shall demonstrate a rationale for the site selection of the proposed development in relation to existing, permitted and proposed development. In general, integration with adjoining development and/or the urban form of the established Centre will be required to prevent piecemeal or premature development. Developers should sequence the delivery of Cookstown radially from the Town Centre, Luas stops and the perimeter.*

The purpose of the sequencing requirements is to ensure that a minimum level of infrastructure, facilities and amenities are provided together with new residential development.

The proposed scheme at Broomhill Road addresses criteria no.1 as it proposes the construction of 5 mixed use blocks which form part of a future urban residential and commercial area.

The proposed scheme at Broomhill Road addresses criteria no.2 as it is located within relative proximity to multiple forms of public transport including bus services and the red Luas line. The proposal also includes a cycle/pedestrian link with the lands to the east and to the north of the site which can be extended in the future if required.

The proposed scheme at Broomhill Road addresses criteria no.3 as it does not address a particularly busy road. However, Broomhill Road does currently experience a certain level of HGV traffic. Commercial usage is proposed to be located at the ground floor of Blocks B, C & D which address Broomhill Road. This will minimise disruption as well as create active frontages for this mixed-use regeneration area.

The proposed scheme at Broomhill Road addresses criteria no.4 as the appropriate assessments have been prepared to be submitted with the application. AWN have prepared a Noise & Vibrations Impact Assessment as well as a Resource Waste Management Plan, Operational Waste Management Plan and Construction Environmental Management Plan that illustrate adequate mitigation measures can be incorporated in the proposed development to prevent any significant negative impacts on future residents or neighbouring properties.

The proposed scheme at Broomhill Road addresses criteria no.5 as it is located in an area which would not be considered premature for development as indicated by recent applications granted permission in the area. The site at Broomhill Road is located within 300m of the TU Dublin Tallaght Campus and Tallaght Town Centre as well as being in close proximity to multiple residential developments indicated in Section 5.2 of this report.

10.11 South Dublin County Council Draft Development Plan 2022-2028

The South Dublin Draft Development Plan 2022-2028 is the relevant statutory planning context for the subject site which will replace the South Dublin County Development Plan 2016-2022. This plan is due to be adopted in June 2022. This Plan will remain valid for 6 years, subject to any review, variations, extensions, or alterations made during the lifetime of the permission.

Building Height & Density

Appendix 10 of the South Dublin Draft Development Plan 2022-2028 contains the Building Height & Density Guide which provides a guide to increased height based on the following criteria.

Context
<p>Is the site well served by public transport with high capacity, frequent service and good links to other modes of public transport by which it links to the wider city and region?</p> <p>Has the proposal adopted an approach to urban intensification proportionate to its setting?</p> <p>Is the increased height proposed required for density?</p>
Setting
<p>How does the proposal respond positively to its surroundings?</p> <p>Are there specific issues of character, topography or visual impact to which the proposal should respond?</p> <p>How does the proposal make a positive contribution to its context?</p>
Connections
<p>Do proposals incorporate new streets to facilitate new links at the local level or improve existing streets and links to local amenities?</p> <p>How does the proposed layout respond to existing streetscape and patterns of development and how are increased heights located in relation to these patterns?</p>
Inclusivity
<p>Does the proposal provide equitable, people-friendly streets, spaces and uses?</p> <p>Are routes appropriately-scaled and properly located within the urban environment to encourage maximum use by as many people as possible?</p>
Variety
<p>Does the form of development at higher densities proposed complement or compete with existing built form and local variations of height?</p> <p>Does the increased height proposed facilitate and encourage a wider mix of uses in the development?</p>

Efficiency
Is the proposed increase in height enabling the optimal use of the land at a sustainable density?
Distinctiveness
How does the development preserve, complement or enhance the character of the area and contribute in a positive manner to the visual setting or built heritage of the area?
Layout
Is the overall layout making use of forms of development appropriate to higher densities?
Public Realm
How safe, secure, and enjoyable are the public areas adjacent to higher buildings, and how has the human scale been taken into account?
Adaptability
Are the buildings and layouts designed to accommodate future change?
Privacy & Amenity
Has the proposal addressed recognised potential impacts of increased height and densities?
Parking
Has parking been considered from a people-first perspective?

The proposal for the lands at Broomhill Road has been deemed to positively include the criteria set out above and promote a scheme that is human focussed and appropriate for this regeneration area.

Housing Mix

The South Dublin Draft Development Plan 2022-2028 states that proposals for residential development shall provide a minimum of 30% 3-bedroom units unless it can be demonstrated that:

- There are unique site constraints that would mitigate against such provision or
- that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA.

The proposal for Broomhill Road provides for no.5 3-bedroom apartments within the scheme which is 2.1% of the total apartments provided. This is deemed appropriate as the socio-economic population and housing data indicate that this type of housing is desired in this area. There is an over supply of 3 bedroom semi detached dwellings in the locality including at Redwood, Tamarisk and Parkhill to the north, Bancroft to the south and Tymon to the east. The proposed housing mix is considered appropriate to meet current market demand as well as provide for appropriate social mix within the development.

Open Space

The Hierarchy of Open Space within the South Dublin Draft Development Plan 2022-2028 can be seen below.

Park Type	Features	Green Infrastructure
Regional Parks	<p>These large public parks vary between 100 to 200ha in size, generally serving areas within a 5km radius, but also catering for users across the County and as a destination for tourists. Generally, they contain natural heritage, built heritage or cultural features and visitor facilities. Activities may include formal and informal children's play areas, walkways and cycleways, seating and passive recreation areas, playing pitches (including all-weather pitches), and changing rooms, running tracks and allotments. They should be easily accessed by public transport and cycling, with adequate provision of bicycle and car parking.</p> <p>The regional parks in South Dublin County are Griffeen Valley Park, Corkagh Park, Dodder Valley Park and Tymon Park.</p> <p>Typically, there should be a regional park located within 5km of all homes in the County.</p>	<p>Regional parks form a key element of the County level strategic green infrastructure (GI) network, contributing to important green corridors passing through urban areas and connecting to rural and upland areas. They often contain significant biodiversity and water management features such as water courses, SuDS, ponds, marshlands and meadows, wooded areas and hedgerows. There are considerable opportunities for strengthening the GI potential of these parks through further biodiversity enhancements.</p>
Neighbourhood Parks	<p>Neighbourhood Parks generally range in size from approximately 20 to 50ha (occasionally up to 100ha) in size. They are accessible by pedestrians and cyclists and can contain a wide variety of facilities and uses which may include playing pitches, and changing rooms relating to outdoor facilities and activities, play facilities, outdoor gyms, walking and cycling routes.</p> <p>Examples of Neighbourhood Parks in South Dublin County include Ballymount, Cookstown, Sean Walsh, Rathcoole, and Waterstown Parks.</p> <p>Neighbourhood parks serve a neighbourhood catchment within 800m.</p>	<p>Neighbourhood parks can incorporate a range of GI features, such as marshlands, meadow parklands, and community gardens, and informal biodiversity rich planting areas. There are considerable opportunities for strengthening the biodiversity value through sensitive enhancement schemes and by creating linkages via local level strategic corridors to the County-wide GI network.</p>

Local Parks/ Open Spaces	<p>Local parks range in size from between 2 to 20ha. They provide mostly for amenity and passive recreation, although some may have playing pitches and play equipment; they are located in close proximity to homes and thereby easily accessible by pedestrians and cyclists.</p> <p>Examples of local parks in South Dublin County are Vessey and Hermitage Parks in Lucan, Ballycragh Park, Firhouse Community Centre Park and Quarryvale Park.</p> <p>Local Parks serve a local population within a 400m catchment.</p>	<p>These parks primarily consist of improved grassland but offer considerable opportunities for contributing to the local level GI network through enhancement schemes that include native trees, small woodlands, hedgerows, meadows and other planting.</p>
Small Parks/ Open Spaces	<p>Small parks (between 0.2 and 2ha) provide important amenity and recreation facilities. They provide mostly for amenity and passive recreation and may incorporate small scale play facilities.</p> <p>Small parks serve an area within 300m catchment of the local neighbourhood population.</p>	<p>Currently GI features tend to be limited, as most areas comprise improved grassland with occasional hedgerows or trees. There are opportunities to strengthen the biodiversity value of these parks through native tree planting and pollinator-friendly planting and management.</p>
Smaller Residential Open Spaces	<p>These smaller open spaces are up to 0.2ha (2000sq m) in size. They are usually provided as the smaller areas of public open space within a residential development but do not include grass verges, narrow strips of planting or incidental or 'left over' open space. They provide informal play/ recreation activities usually for smaller children and have a visual and social function also. 'Amenity Green Spaces' as defined in the Parks and Open Space include smaller residential open spaces.</p> <p>All homes should be within 100m of this or another type of accessible open space. No contributions in lieu will be acceptable.</p>	<p>Smaller open spaces serve as stepping stones within the wider GI network.</p>
Civic Spaces/ Squares	<p>These important spaces vary in size (mostly less than 0.2ha) and include civic areas and market squares and other hard surfaced and soft areas. They serve a neighbourhood function and are designed for pedestrian movement and social interaction in urban settings.</p>	<p>There are opportunities to strengthen the GI and biodiversity value of these spaces through SuDS features and native tree and pollinator-friendly planting.</p>

The open space which is being provided within the proposal at the subject site is categorised within this hierarchy as 'Smaller Residential Open Spaces'. The scheme has met and exceeded the 10% requirement of site area reserved for Public Open Space as well as exceeded the requirement for 1512sqm Communal Open Space set out in the Draft Development Plan. We therefore submit that the functionality and appropriateness of the open space provided within the proposed development is within standard requirements and can be appropriately managed to meet the requirements of all.

Car Parking

The site at Broomhill Road is considered to fall within the following parking zone.

Zone 2 (Residential): More restrictive rates for application within town and village centres, within 400 metres of a high quality public transport services⁵ (includes a train station, Luas station or bus stop with a high quality service).

The requirements for this zone are outlined below.

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 spaces	1 space
	3 Bed+	1.5 spaces	1.25 spaces
House	1 Bed	1 space	1 space
	2 Bed	1.5 spaces	1.25 spaces
	3 Bed+	2 spaces	1.5 spaces

These criteria would require the proposal at Broomhill Road to include 219.25 parking spaces. The proposal currently includes 136 car parking spaces. These standards are considered maximum and therefore there is a possibility of a reduction in the number of spaces under the development proposal, particularly given the apartment design guidelines. 136 spaces are considered appropriate given the proximity to public transport and alternative cycle parking spaces provided.

Bicycle Parking

The South Dublin Draft Development Plan 2022-2028 states the following requirements for bicycle parking.

Category	Land-Use	Long Term	Short Stay
Accommodation	Hotel ¹	1 per 5 staff	1 per 10 bedrooms
	Nursing Home	1 per 5 staff	1 per 10 residents
	Residential Apartment	1 per bedroom	1 per two apartments
	Student Accommodation	1 per bedroom	1 per 5 bedrooms

The proposal for Broomhill Road currently provides the scheme with 308 residential parking spaces and 118 visitor parking spaces (426 spaces in total). The criteria set out above requires 393 long term spaces and 121 short term spaces (514 in total). This is deemed appropriate as it is in line with the current apartment guidelines in relation to bicycle parking and as discussed with the Planning Authority at pre-planning stage.

Conclusion

The subject proposal is consistent with the standards and requirements of the South Dublin Draft County Development Plan 2022-2028 as set out above and there is no reason within the Draft Plan why the subject proposal cannot be granted permission.

11 Conclusion

This Statement of Consistency and Planning Report has identified the compliance of the scheme with relevant strategic and statutory planning policy documentation, and we trust that the Board will now accept that the key objectives of each of the documents cited in this report have been met.

We direct the attention of the Board to other material submitted herewith for further detail on the context of the site at Broomhill Road and a clear and concise development description.

We invite the Board to consider the proposal now in front of them. We note the following key summary points:

- The applicant, Garyaron Homes Ltd. has extensive experience in the construction of high quality residential schemes and delivers exceptional standards of residential amenity. Their objective is to create vibrant communities and neighbourhoods where people will want to live, underpinned by a focus on industry leading urban design, placemaking, sustainability and technological innovation.
- The subject site is a prime underutilised suburban site located proximate to key public transport nodes. The site is therefore optimally located to provide for a higher residential density and additional height in compliance with the national policy mandate.
- It is our considered view that the proposal now submitted delivers on the ambitions of relevant National Guidelines (e.g. NPF, Rebuilding Ireland and RSES) and we ask that An Bord Pleanála have regard to this in their consideration of the proposal.
- The development can deliver much needed purpose-built residential accommodation at a key location.
- The subject site benefits from close proximity to TU Dublin – Tallaght, Tallaght hospital and Tallaght Town Centre.
- The proposed use ‘residential’ is acceptable in principle at this site and under this zoning.
- We can confirm that we have addressed insofar as possible all pre-planning feedback from South Dublin County Council.

We ask that the Board consider these points in their review of proposals, and we trust that they will view this application as a positive move towards delivery of sustainable development on zoned lands.