
Statement of Consistency & Planning Report

Mixed-use Development

Lands West of Old Belgard Road and North, South & West of Cookstown Road, Cookstown Industrial Estate, Tallaght, Dublin 24

Joseph Costello, Absolute Limousines Ltd and Boherkill Property Development Ltd

February 2021



Hughes Planning & Development Consultants

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Application Preface

The Applicants, Joseph Costello, Absolute Limousines Ltd and Boherkill Property Development Ltd, has acquired the subject land (Lands West of Old Belgard Road and North, South & West of Cookstown Road, Cookstown Industrial Estate) with the intention of securing the optimum land use on these underutilised sites within the Cookstown Industrial Estate. The Cookstown Industrial Estate is an area identified for 'regeneration' in the South Dublin County Development Plan 2016-2022. It is expected to be the subject of extensive urban renewal in the coming years, with existing industrial buildings being replaced with higher density development and multi-national corporations, such as Amazon, commencing operation in the area.

The subject site is the ideal starting point for the regeneration of the northern part of the Cookstown Industrial Estate for a no. of reasons. Firstly, the subject site comprises a large parcel of land capable of establishing a self-sustaining neighbourhood with its own character. Further to this, the subject proposal includes road, junction and streetscape upgrades which will see the existing industrial setting being replace with a more residential environment. Secondly, the immediately surrounding area has started to see an infiltration of non-industrial uses in recent times, with a 4-storey office building featuring immediately adjacent at the Old Belgard Road and Cookstown Road roundabout and an Aldi Supermarket having been recently constructed further north. Finally, the pedestrian/cycle link to the Belgard Luas Stop provided by the subject proposal unlocks the development potential of this part of the Cookstown Industrial Estate and will stimulate redevelopment of surrounding lands. Currently, sites featuring on the northern side of Cookstown Road turn their back to the Luas Line. The road, junction and streetscape upgrades included in the subject application will also stimulate redevelopment of adjacent sites and the northern elevation of Block A will provide a new active frontage to the Luas line as illustrated in Drawing No. 2102, prepared by C+W O'Brien Architects.

A mixed-use development, comprising primarily 'Build-to-Rent' residential apartments, has been identified as the preferred land use option for the subject site having regard to the employment opportunities existing in the surrounding area, including the Tallaght University Hospital, TU Dublin (Tallaght Campus) and Amazon, and the sites proximity to multiple public transport services linking the Tallaght area with Dublin City Centre. In addition, the subject site is proximate to Tallaght Town Centre, which features an array of established services and facilities for residents of the surrounding area, and a public open space area proposed immediately south-east under the Tallaght Town Centre Local Area Plan 2020-2026.

Extensive market analysis, including a review of national and local demographic information and adjacent land uses, was undertaken to inform the optimum mix of units within the development which would meet market and demographic demand. Further to this, LIV Consulting, who have extensive experience regarding the management of such schemes, were consulted with regards to amenity space provision and layout.

Despite involving a contravention to the unit/tenure mix sought by the Tallaght Town Centre Local Area Plan 2020-2026, the proposed development is consistent with the provisions of the Specific Planning Policy Requirements 7 & 8 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018), which relate specifically to Build-to-Rent developments, and national plans and guidance more broadly.

The proposed development fully accords with national plans and guidance documents; has had regard to housing market needs of the area and is consistent with a range of Strategic Housing Development developments previously granted by An Bord Pleanala in the immediately surrounding area and Dublin more broadly.

The subject proposal has also been designed having regard to the feedback received from An Bord Pleanala and South Dublin Council during pre-planning consultations; the policies and objectives outlined in the Tallaght Town Centre Local Area Plan 2020-2026 and South Dublin County Development Plan 2016-2022; and the Environmental Impact Assessment Report prepared in conjunction with the subject application.

1.0 Introduction

Hughes Planning and Development Consultants, 70 Pearse Street, Dublin 2, have prepared this statement of consistency & planning report on behalf of our clients, Joseph Costello, Absolute Limousines Ltd and Boherkill Property Development Ltd, to accompany a planning application to An Bord Pleanála for a proposed Strategic Housing Development at Lands West of Old Belgard Road and North, South & West of Cookstown Road, Cookstown Industrial Estate, Tallaght, Dublin 24. More specifically, the proposed development, as per the description contained within the statutory planning notices, provides for:

(i) Demolition of the existing industrial and commercial buildings (15,989sq.m); (ii) construction of a mixed-use development featuring: (a) 1104 no. 'build-to-rent' apartments (132 no. studio apartments, 475 no. 1-bed apartments, 208 no. 2-bed apartments, 244 no. 2-bed duplex units and 45 no. 3-bed apartments) in 4 no. blocks varying in height from four to eleven storeys. Each apartment has associated private open space in the form of a ground floor terrace or a balcony and has access to internal communal amenity spaces (totalling 2741sqm) and 5,107sqm of external communal amenity space at ground, first floor and roof levels; and (b) 4 no. commercial units at ground floor level of Blocks B and D (comprising of 2 no. in Block B accommodating a cafe/restaurant/bar; 1 no. in Block D accommodating Class 1, 2 and 8 uses as per the Planning and Development Regulations, 2001-2019, as amended; and 1 no. in Block D to serve the Circle K Belgard petrol station which is to be retained), 1,500sqm of office space across first to sixth floor levels of Block D and a crèche with external play area at ground floor level of Block C. The development is served by a total of 351 no. parking spaces (including 17 no. limited mobility parking spaces and 16 no. car share spaces) and 1860 no. bicycle spaces (1464 no. resident spaces and 396 no. visitor spaces); (iii) road, junction and streetscape upgrade works along First Avenue, Cookstown Road and Old Belgard Road, including the installation a signalised junction at the intersection of First Avenue and Cookstown Road and Old Belgard Road and Cookstown Road; (iv) construction of 3 no. new roads and 1 no. pedestrian/cycle link to the Belgard Luas Stop; (v) construction of a 1,688sqm landscaped public plaza with an outdoor flexible events space in the south-western corner of the site; and (vi) associated site and infrastructural works are also proposed which include: foul and surface water drainage; attenuation tanks; lighting; landscaping; boundary fences; plant areas; ESB substations; internal hard landscaping, including footpaths and street furniture; and all associated site development works.

The purpose of this report is to provide background information on the site, a description of the proposed development, the planning rationale and justification for the proposed development and the required information set out in the Strategic Housing Development Application Form. This report has been prepared in accordance with the requirements of the Planning and development (Strategic Housing Development) Regulations 2017.

The subject application has been prepared having regard to the feedback received from An Bord Pleanála and South Dublin Council during pre-planning consultations, the Tallaght Town Centre Local Area Plan 2020-2026 and South Dublin County Development Plan 2016-2022; and the Environmental Impact Assessment Report prepared in conjunction with the subject application.

This report should be read in conjunction with the Environmental Impact Assessment Report prepared in conjunction with the subject application and the following reports/plans:

- C+W O'Brien Architect Architectural Drawings and Design Statement
- NRB Consulting Engineers Transportation Assessment Report
- Cunnane Stratton Reynolds Landscape Plans and Landscape Strategy and Design Report
- GDCL Consulting Engineers Engineering Services Report and Engineering Drawings
- JAK Consulting Engineers Sunlight, Daylight and Shadow Assessment Report, Climate Change Adaptation & Energy Efficiency Statement, Public Lighting Calculations and M&E Engineering Drawings
- O'Dwyer & Jones Design Partnership Aeronautical Assessment Report

- 3D Design Bureau
 - Altamar Ecological Consultants
 - AWN Consulting
 - Cushman Wakefield
 - LIV Consulting
- Photomontages
 - Appropriate Assessment Screening
 - Building Lifecycle Report, Construction & Demolition Waste Management Plan, Operational Waste Management Plan and Outline Construction Environmental Management Plan
 - Commentary on the Private Rented Sector/Market Demand
 - Build to Rent Market Justification Report and BTR Operational Management Plan

2.0 Site Location and Description

The subject application involves a large parcel of land located to the west of Old Belgard Road and east of the intersection of First Avenue and Cookstown Road, Cookstown Industrial Estate, Tallaght, Dublin 24. The subject site comprises an area of approximately 4.99Ha (12.3 acres). It includes a no. of existing industrial/commercial premises fronting Cookstown Road, Old Belgard Road and First Avenue; the Circle K Belgard petrol station and associated commercial premises; 0.98Ha of South Dublin County Council owned land; and 0.19 Ha of Dublin City Council owned land (consent letters from South Dublin County Council and Dublin City Council accompany this application under a separate cover). The South Dublin County Council owned land comprises parts of First Avenue, Cookstown Road and Old Belgard Road and the Dublin City Council owned land comprises a strip to the north of Unit 5 First Avenue and Unit 4 Cookstown Road which provides access to the Belgard Luas Stop.

There are existing low-rise (1-3 storeys) industrial/commercial buildings (which have a total floor area of 15,988sqm) featuring on the subject land. These, inclusive of the commercial premises associated with the existing Circle K Belgard petrol station, are proposed for demolition as part of the subject proposal. The Circle K Belgard petrol station and forecourt are to be retained and a new commercial premise serving it provided as part of the subject application.

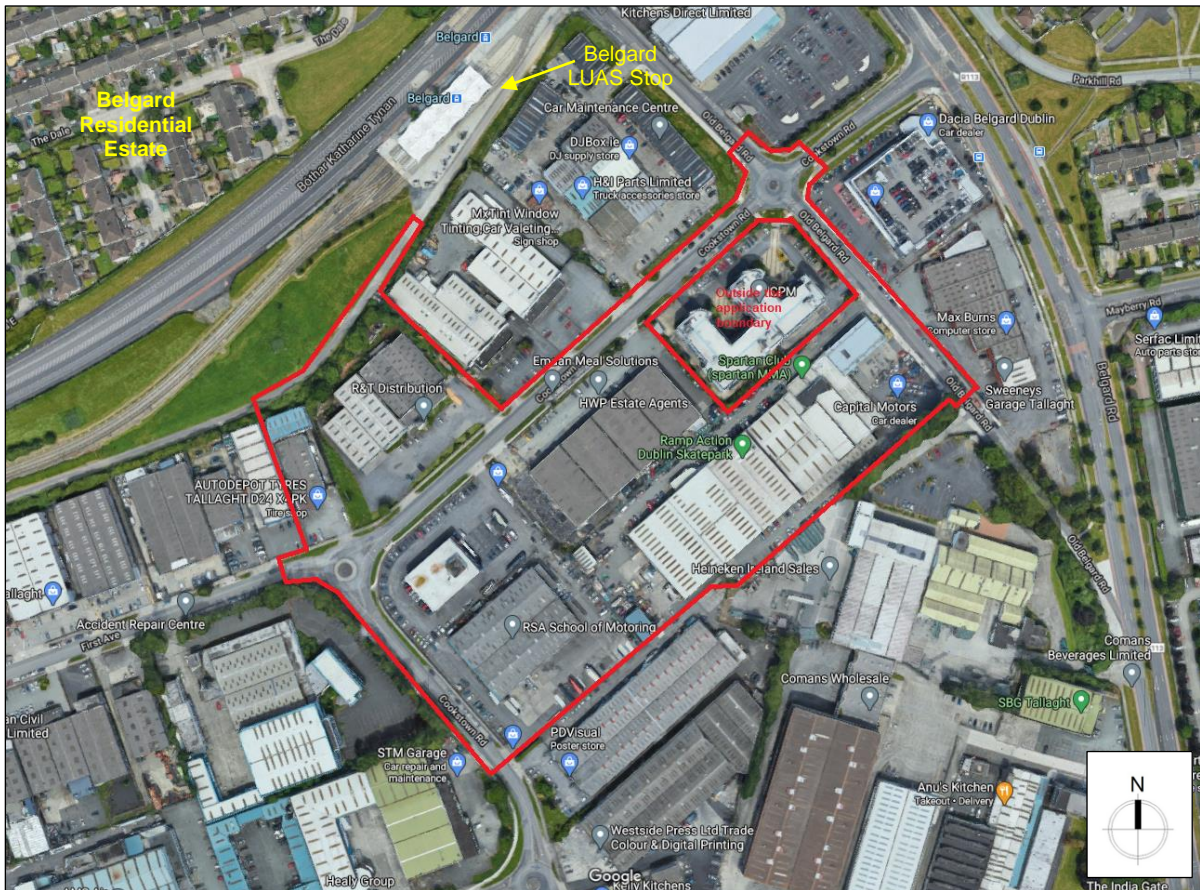


Figure 1.0 Aerial image showing the application site (outlined in red)



Figure 2.0 Existing view of the subject site as viewed from the intersection of Cookstown Road & First Avenue looking south-east (left) and Cookstown Road (north) looking south (right)



Figure 3.0 Existing view of subject site as viewed from Cookstown Road (west) looking east (left) and Old Belgard Road looking west (right)



Figure 4.0 Existing view of subject site as viewed from the intersection of First Avenue and Cookstown Road, looking north (110kV power lines featuring in the background)

The site is located within an area comprising industrial land use immediately east, west, south and north (in part). The western part of the subject site's northern boundary is flanked by an access road and

open space area featuring 110kV power lines. Further north, is the Red Luas line and Katherine Tynan Road.

The Cookstown Industrial Estate is expected to be the subject of extensive urban renewal in the coming years, with existing industrial buildings being replaced with higher density development and multi-national corporations, such as Amazon, commencing operation in the area. Currently, the majority of the immediately surrounding buildings are older building stock, save for a recently constructed 4-storey office building featuring at the Old Belgard Road and Cookstown Road roundabout. However, a number of large scale residential and mixed-use developments have been approved in the surrounding area in recent times (discussed further in Section 3.3 and illustrated in the plan excerpt included in Figure 6.0 overleaf).

A strong feature of the subject site is its proximity to the Belgard Luas stop, which is located immediately north-east of the application site, offering a high frequency, high capacity public transport service with direct links to Dublin City Centre, Dublin Docklands, Heuston Station, Citywest Campus and Tallaght Hospital/Town Centre. It is also noted that the site is in close proximity to Bus Routes No. 76 and 76A which run along Belgard Road. Tallaght Hospital is situated to the south-west of the subject site and Technological University Dublin, Tallaght Campus is situated to the south-east of the subject site.

The subject site is the ideal starting point for the regeneration of the northern part of the Cookstown Industrial Estate for a no. of reasons. Firstly, the subject site comprises a large parcel of land capable of establishing a self-sustaining neighbourhood with its own character. Further to this, the subject proposal includes road, junction and streetscape upgrades which will see the existing industrial environment evolving into a more residential environment. Secondly, the immediately surrounding area has started to see an infiltration of non-industrial uses in recent times, with a 4-storey office building featuring immediately adjacent at the Old Belgard Road and Cookstown Road roundabout and an Aldi Supermarket having been recently constructed further north. Finally, the pedestrian/cycle link to the Belgard Luas Stop provided by the subject proposal unlocks the development potential of this part of the Cookstown Industrial Estate and will stimulate redevelopment of surrounding lands. Currently, sites featuring on the northern side of Cookstown Road turn their back to the Luas Line. The road, junction and streetscape upgrades included in the subject application will also stimulate redevelopment of adjacent sites.



Figure 5.0 Aerial image showing the application site (indicated with red star) in the context of the wider area



Figure 6.0 Excerpt of Masterplan, prepared by C+W O'Brien Architects, illustrating developments approved/proposed in the Cookstown Industrial Estate

3.0 Pre-planning Consultations

3.1 Pre-planning Consultations with South Dublin County Council

We note that 3 no. Section 247 Consultation meetings took place with the Planning Authority in relation to this application, as well as an informal meeting. The details of these 3 no. meetings are provided in turn below.

Meeting No. 1 (Ref. No. SHD1SPP012/19)

Date: 9th May 2019

Attendees:

- Hazel Craigie – Senior Planner, South Dublin County Council
- Jim Johnston - Senior Executive Planner, South Dublin County Council
- Colm Maguire – Assistant Planner, South Dublin County Council
- Ronan Toft – Assistant Engineer, South Dublin County Council
- Brendan Redmond – Acting Executive Parks Superintendent, South Dublin County Council
- Robert Roche – Assistant Engineer, South Dublin County Council
- Jason Tyler - Partner, Tyler Owens Architects
- Ray Grogan – Architect, Tyler Owens Architects
- Eoin Reynolds - Director, NRB Consulting Engineers
- Kevin Hughes – Director, Hughes Planning and Development Consultants

Margaret Commane – Associate, Hughes Planning and Development Consultants
 Declan O’Leary - Director, Cunnane Stratton Reynolds Land Planning and Design
 Simon Madigan – Assistant Landscape Architect, Cunnane Stratton Reynolds Land Planning and Design
 Joseph Costello – Applicant Group
 Karl Hannigan – Applicant Group
 Sean Hannigan – Applicant Group

The proposal tabled at this meeting can be described as follows:

Demolition of a number of existing low rise industrial units and removal of the existing car showroom on the subject site and the construction of a ‘build-to-rent’ housing development across the site, comprising 22 no. blocks, varying in height from three to twelve storeys in height, accommodating 1480 no. residential apartments (425 no. studios, 244 no. 1-bed, 246 no. 2-bed (3P) and 565 no. 2-bed (4P)).

The development will also feature 579 no. car parking spaces at basement level across the site (497 no. spaces in the larger parcels and 82 no. spaces); 102 no. on-street carparking spaces; 787sq.m of bicycle storage space for residents provided across the site; a gym at ground floor level of Block 10 and a creche at ground floor level of Block 07. The ground floor level of the 22 no. blocks will feature residential, commercial, office, industrial/craft, restaurant/cafe and retail units as well as communal amenity rooms to serve the residents of the development and community rooms to serve the area more broadly.

It is also proposed to construct a new road through the subject site, which links the Cookstown Road/First Avenue Roundabout with the R838, as well as a new pedestrian link from Cookstown Road to the Belgard Luas Stop immediately north. More specifically, this new road and pedestrian link will occupy the western part of the smaller parcel of land making up the subject site.



Figure 7.0 Indicative site layout of the proposed development tabled at first S247 meeting



Figure 8.0 3D drawing illustrating the massing of the proposed blocks across the site tabled at first S247 meeting



Figure 9.0 CGI of the proposed of the proposed development illustrating the varying building heights proposed across the site tabled at first S247 meeting

In summary, South Dublin County Council raised significant concerns regarding the proposed scheme, including the following:

- The overall density being too high;
- The general building height being above the LAP;
- The mono-tenure provision of homes not enabling the long-term provision of a mixed community.
- The provision of some Private for Sale housing was recommended;
- The of public, private and communal amenity spaces provided. There was deemed to be an under provision; and

- A redesign of the blocks being needed to provide more active and well-lit streets and amenity spaces, and more work is needed to improve the internal and external micro-climates and to demonstrate that they would achieve acceptable environmental standards.

They stated that a significant redesign of proposal was required in light of urban design issues and issues emerging from the (at that time) unpublished Draft Tallaght LAP. They recommended that further discussions should be had on this scheme before the applicant progresses to pre-planning with An Bord Pleanála.

The design team and applicants took the feedback on board and advanced a revised pre-planning proposal for the subject site which was considered at a second pre-planning meeting.

Meeting No. 2 (SHD1SPP0012/19)

Date: 11th July 2019

Attendees: Mick Mulhern - Director of Land Use Planning and Transportation
Hazel Craigie – Senior Planner
Jim Johnston - Senior Executive Planner
Colm Maguire – Assistant Planner
Naoimi Dowds - Student Planner
Brendan Redmond - Assistant Parks Superintendent
Laurence Colleran – Senior Executive Parks Superintendent
- All of South Dublin County Council
Kevin Hughes – Director, Hughes Planning and Development Consultants
Margaret Commane – Senior Planner, Hughes Planning and Development Consultants
Jason Tyler - Partner, Tyler Owens Architects
Ray Grogan – Architect, Tyler Owens Architects
Eoin Reynolds - Director, NRB Consulting Engineers
Joseph Costello – Applicant Group
Karl Hannigan – Applicant Group

The proposal tabled at this meeting involved a similar proposal in terms of unit nos. and mix to that tabled on 9th May 2019 but included the following amendments in terms of design and access:

- Omission of the previously proposed link road to the R838;
- Introduction of an additional north-south link road centrally on the site (previously pedestrian/cycle only connection proposed);
- A reconsidered open space strategy for the development, including the addition of a large public open space area to the north of the development;
- Blocks in the southern portion of the site have been reconfigured and re-orientated to provide a better frontage to the proposed Through Road and also to improve daylight and sunlight penetration to central areas of the development;
- Entrances to basement carparking areas were incorporated into the proposed buildings;
- Variation were introduced in relation to the BTR units proposed i.e. blocks have been broken down into family blocks, young professional blocks, temporary resident blocks (for travelling professional) etc;
- A pedestrian link has been created in the northern section of the site to the nearby Luas Stop; and
- A phasing plan for development was included with the revised proposal.

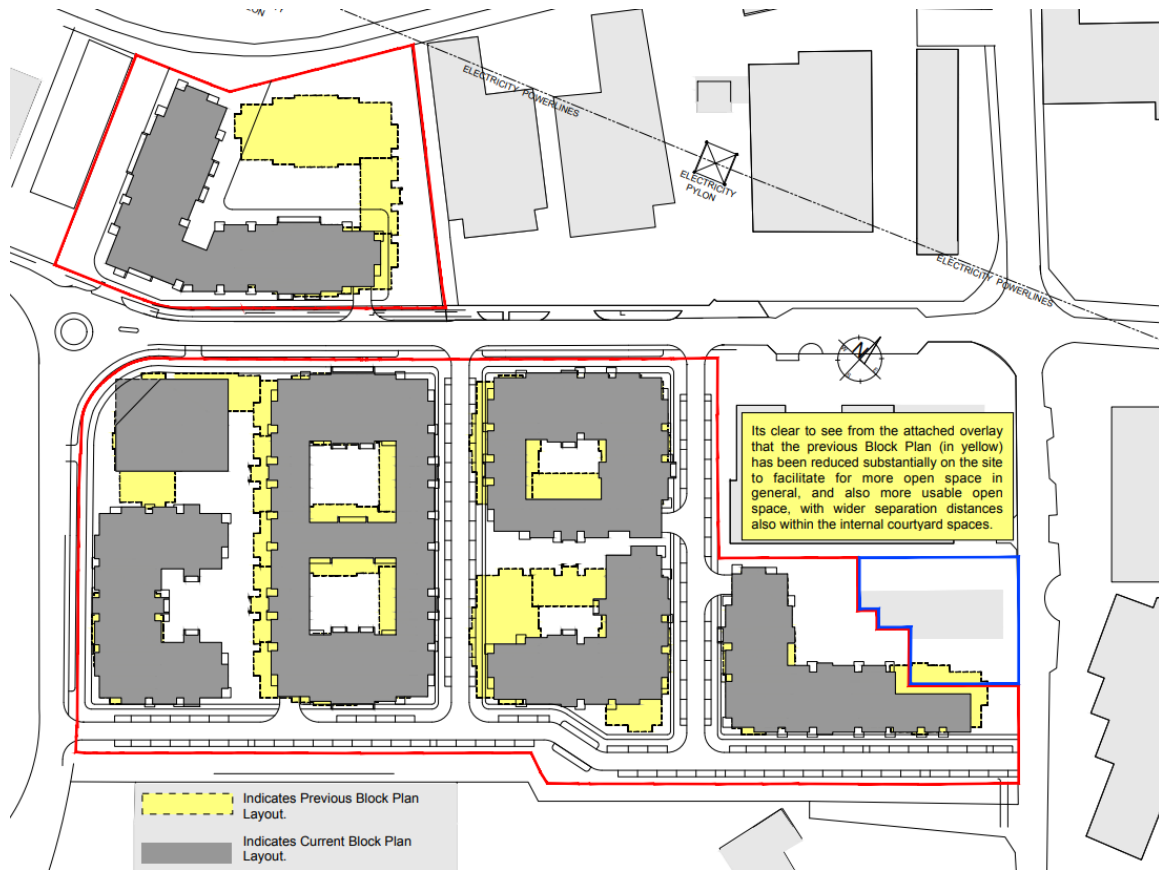


Figure 10.0 Indicative site layout of the proposed development tabled at second S247 meeting

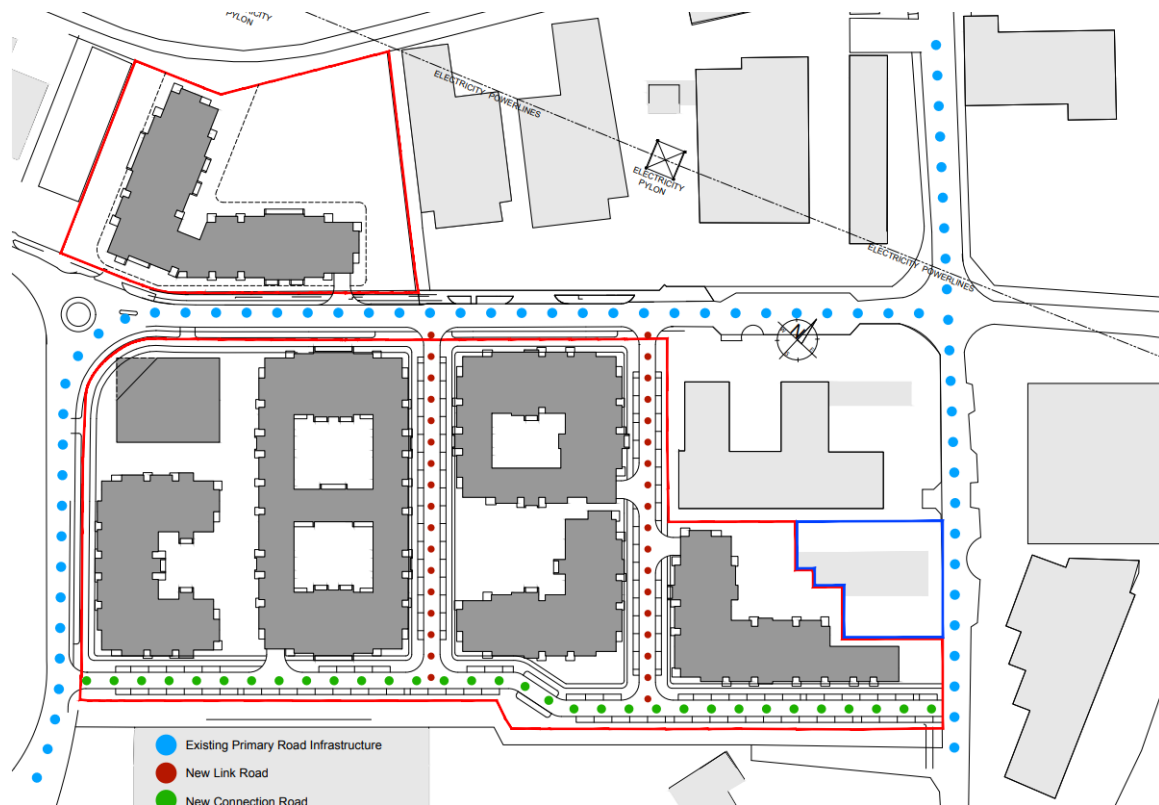


Figure 11.0 Roads layout and hierarchy plan for the proposed development tabled at second S247 meeting



Figure 12.0 Private and public open space strategy for the proposed development tabled at second S247 meeting



Figure 13.0 Phasing plan for the proposed development tabled at second S247 meeting

In summary, South Dublin County Council raised concerns regarding the proposed scheme, including the following:

- Tenure and unit mix;
- Justification for the location and timing of development, understanding of proposed phasing;
- Street connections;
- Plaza/open space, surrounding uses and complementarity with Draft LAP;
- Visual impact, significant improvement required; and
- Overall layout, quality of internal spaces, meeting necessary standards.

They concluded that the scheme needed to be redesigned due to the sizeable concerns on the various strategic issues raised.

The design team and applicants took the feedback on board and advanced a revised pre-planning proposal for the subject site which was considered at a third pre-planning meeting (a formal S247 meeting in relation to the northern parcel and informal discussion in relation to the southern parcel).

Meeting No. 3 (SHD1SPP023/19) – formal S247 meeting in relation to the site’s northernmost parcel and informal discussion in relation to the site’s southern parcel

Date: 2nd October 2019

Attendees: Mick Mulhern - Director of Land Use Planning and Transportation
Jim Johnston - Senior Executive Planner
Colm Maguire – Assistant Planner
John Joe Hegarty - Senior Executive Engineer
Ronan Toft – Assistant Engineer
Laurence Colleran – Senior Executive Parks Superintendent
Oisín Egan - Executive Parks Superintendent
- All of South Dublin County Council
Margaret Commane – Associate, Hughes Planning and Development Consultants
Arthur O’Brien – Managing Director, C+W O’Brien Architects
William Power – Director, C+W O’Brien Architects;
Eoin Reynolds - Director, NRB Consulting Engineers
Joseph Costello – Applicant Group
Karl Hannigan – Applicant Group
Sean Hannigan – Applicant Group

This pre-planning meeting revolved around 2 no. pre-planning packs circulated prior to the meeting – one pertaining to the site’s northern parcel and one pertaining to the site’s southern parcel.

The proposals tabled at this meeting involved a distinctly different proposal in terms of design, unit nos., and mix to that tabled on 11th July 2019. The improvements from the July proposal included the following:

- Permeability through the site, both pedestrian and vehicular, had been improved;
- The amount of open space provided had been increased and the open space provided had been better
- designed for public and private use;
- The height and massing of the proposed development had been reduced which has had a resultant reduction in unit nos.;
- The level of activation and variance in height had been improved along the proposed developments southern interface;
- The mix of unit types and ground floor uses had been improved; and
- The site had been divided into 2 no. parcels – to be dealt with as 2 no. separate applications.

The proposal discussed in relation to the northern parcel involved the following:

Demolition of the existing industrial units and the construction of an 8-12 storey ‘build-to-rent’ housing development providing a total of 284 no. residential apartments (comprising 40 no. studio units, 50 no. one-bed units, 79 no. two-bed units and 95 no. three-bed). The proposal also includes the creation of a new pedestrian link adjacent to the subject site’s eastern boundary, linking Cookstown Road to the Belgard Luas Stop immediately north.



Figure 14.0 Massing model for the proposed development on the northern parcel tabled at the formal S247 meeting



Figure 15.0 Site layout and connection plan for the proposed development on the northern parcel tabled at the formal S247 meeting

The proposal discussed in relation to the southern parcel involved the following:

Demolition of the existing industrial units and the construction of a 5-12 storey ‘build-to-rent’ housing development providing a total of 849 no. residential apartments (comprising 174 no. studio units, 245 no. one-bed units, 359 no. two-bed units, 56 no. three-bed units and 15 no. 4-bed units). The proposal also includes the creation of 3 no. new roads (one adjacent to the sites southern boundary and 2 no. north-south links centrally on the site).



Figure 16.0 Massing/layout model for the proposed development on the southern parcel tabled at the informal pre-planning meeting

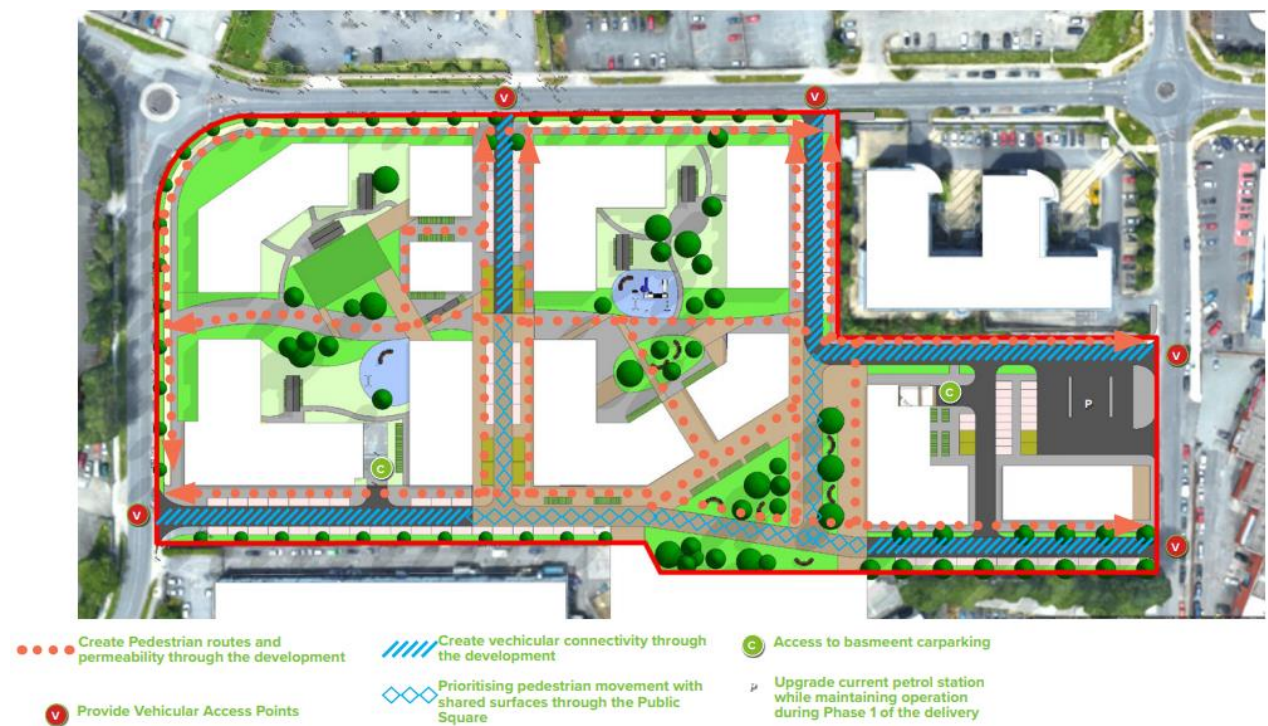


Figure 17.0 Site permeability and access diagram for the proposed development on the southern parcel tabled at the informal pre-planning meeting

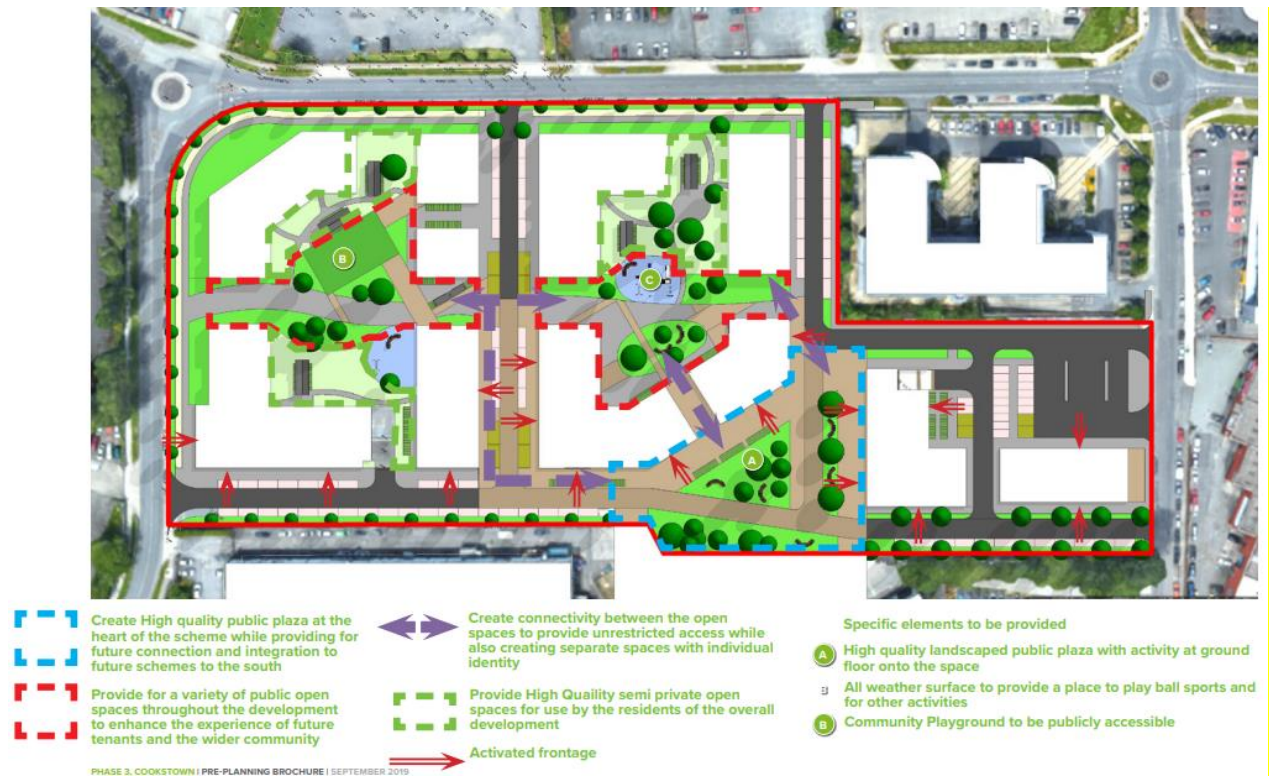


Figure 18.0 Open Spaces & Landscaping Strategy for the proposed development on the southern parcel tabled at the informal pre-planning meeting



Figure 19.0 Ground floor use plan for the proposed development on the southern parcel tabled at the informal pre-planning meeting



Figure 20.0 Height strategy for the proposed development on the southern parcel tabled at the informal pre-planning meeting



Figure 21.0 Phasing strategy for the proposed development on the southern parcel tabled at the informal pre-planning meeting

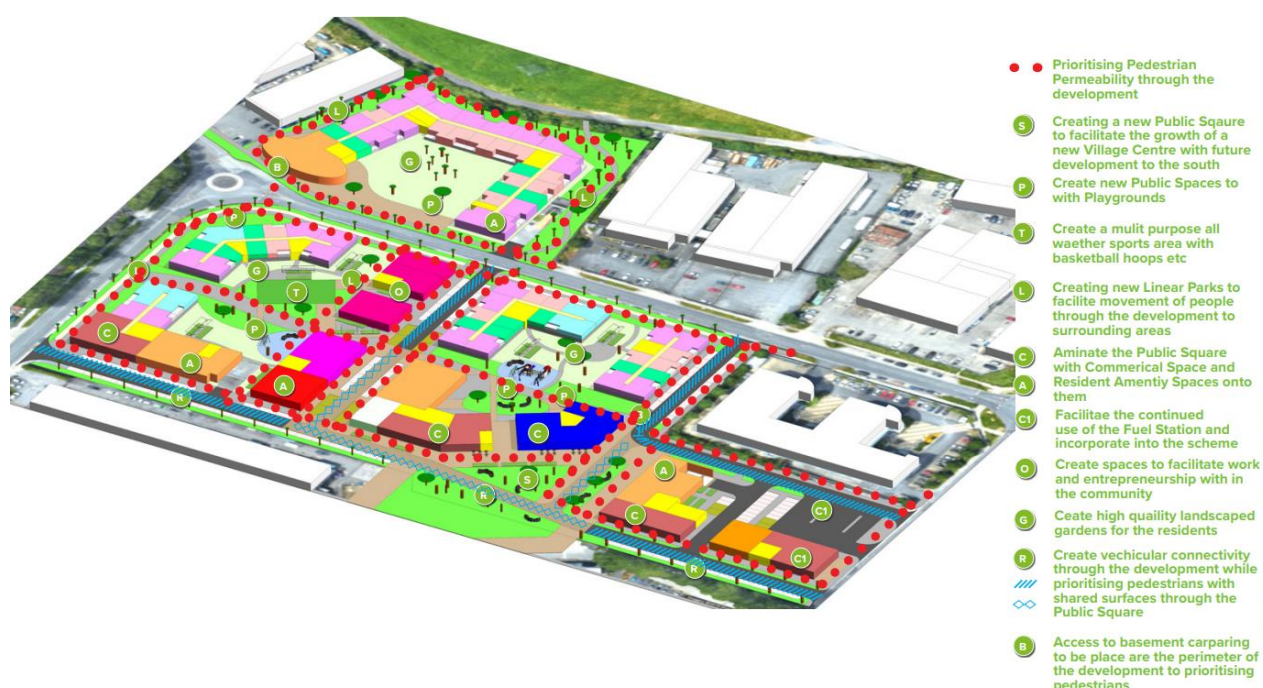


Figure 22.0 Overall strategy for the proposed development across the northern and southern parcels tabled at the informal pre-planning meeting

In summary, South Dublin County Council raised concerns regarding the proposed scheme, including the following:

Pedestrian Link

- South Dublin County Council raised the prospect of the pedestrian link and deliverability of the link to the LUAS stop.
- It was noted that if the land was in the ownership of the Local Authority, the footpath through the site needs to be stronger, more identifiable as a public thoroughway. If it is council land, the Planning Authority can work in tandem to deliver a connection.
- If it is not council land, the applicant would have to show some evidence that it will be delivered.

Height and Density

- The development does not accord with the Draft Local Area Plan.

Tenure Mix

- The development does not accord with the Draft Local Area Plan policies on unit tenure mix.

Layout

- The form of the layout is generally acceptable in principle. However, the pre-planning documents show blank facades, an odd-shaped ground floor element, and the street treatment is unclear. The Planning Authority would welcome, in principle, the use of duplex units to the south, fronting onto the street.
- The Planning Authority expressed their desire to see the single-aspect north facing units designed out.

Sequencing and Phasing

- The applicant should satisfy themselves that the proposal complies with the sequencing policy in the Draft Local Area Plan.
- The Planning Authority advised that the site is not immediately adjoining the LUAS station, and therefore a combined application for a larger site would be more likely to establish its own character as sought in the policy.

Of particular note was South Dublin County Council's recommendation that a single application be lodged for the southern and northern parcels combined.

Please note no formal meeting notes were prepared in relation to discussions pertaining to the southern parcel given the informal nature of the meeting. In summary, we note the following concerns raised by South Dublin County Council:

- The building heights proposed;
- The proximity of the residential units to the petrol station being retained;
- The mix of tenures proposed;
- The extent of commercial/retail uses being proposed in light of the high level of vacant premises featuring in the Tallaght Town Centre currently; and
- The position of the public open space proposed. They recommended it be re-positioned in the south-western corner of the site to mirror the one proposed in the Draft Tallaght Town Centre Local Area Plan 2020-2026.

The design team and applicants have taken the above feedback received on board in advancing the subject proposal. In response to the feedback received on the 2nd October 2019, the subject proposal incorporates the following amendments:

- The northern and southern parcels are being dealt with in one application.
- We have verified that the land immediately north of our site is in the ownership of Dublin City Council and therefore the pedestrian link to the LUAS stop is capable of being created. The proposed pedestrian link has also been increased in size and features improved landscaping.
- The development adopts the tenure mix outlined with the Draft Tallaght Town Centre Local Area Plan 2020-2026.
- Duplex units have been introduced adjacent to the southern boundary of the northern parcel, fronting onto the street.
- The proposed facades and ground floor elements have been resolved and a clearer picture of the proposed street treatment provided.
- Residential units have been omitted from the block immediately adjacent to the petrol station being retained, with offices now proposed in this area.
- The extent of commercial/retail uses being proposed has been reduced.
- The public open space area has been re-positioned in the south-western corner of the site to mirror the one proposed in the Draft Tallaght Town Centre Local Area Plan 2020-2026.
- The phasing of development has been reconsidered to take into account the desire expressed in the Draft Tallaght Town Centre Local Area Plan 2020-2026 that development be built out from the Luas Stops.

As illustrated above, the design team and applicants have engaged in extensive pre-planning discussion with South Dublin County Council and made extensive changes in response to feedback received in advancing the subject proposal.

5.2 Consultation with An Bord Pleanála (ABP Ref. ABP-30402-20)

Following consultations with South Dublin County Council, a request to enter into pre-planning consultations with An Bord Pleanála was submitted and a pre-planning consultation meeting was held on 20th February, 2020.

The development tabled at this meeting comprised:- the demolition of existing industrial units/buildings (totalling 15,989sq.m) and construction of a mixed-use development, featuring 1156 no. apartments

(172 no. studios, 321 no. 1-bed apartments, 623 no. 2-bed apartments, 28 no. 3-bed apartments, 7 no. 4-bed apartments and 5 no. 2-bed duplex units), in 7 no. blocks varying in height from two to fifteen storeys over basement (totalling 125,789.995sq.m). The proposed development retained the existing petrol station (associated with Circle K Belgard) located in the north-eastern corner of the larger land parcel. The proposed scheme had a housing density of 289 dwellings per Ha, a plot ratio of 2.77 and a site coverage of 29%.

More specifically, the 7 no. blocks can be described as follows:

- Block A** Residential building (2 to 12 storeys, over basement car park) located in the northern part of the site accommodating 5 no. duplex apartments, 60 no. studio apartments, 69 no. 1-bed apartments and 125 no. 2-bed apartments, with associated balconies / terraces for each apartment from ground floor to 11th floor levels. Block A featured a 348.2 sqm of communal amenity room at ground floor level. Block A's basement featured 91 no. car parking spaces (5 no. of which are mobility impaired user spaces), 724 no. bicycle parking spaces (and 50 no. spaces at ground floor level) and a refuse store.
- Block B1 - B2** Mixed-use building (10 to 15 storeys, over basement car park) located in the south-western corner of the site accommodating 38 no. studio apartments, 136 no. 1-bed apartments and 224 no. 2-bed apartments, with associated balconies / terraces for each apartment from ground floor to fifteenth floor levels, 2 no. commercial units (totaling 601.3sq.m) and a 366.6sqm retail unit. Block B featured 2 no. communal amenity rooms (totaling 466.3 sqm) at ground floor level. Block B's basement featured 115 no. car parking spaces (2 no. of which are mobility impaired user spaces), 604 no. bicycle parking spaces (and 44 no. parking spaces at ground floor) and a refuse store.
- Block C1 – C3** Residential building (8 storeys, over basement car park which is shared with Blocks C2 and C3) located centrally on the site fronting Cookstown Road immediately east of Block B2, accommodating 34 no. studio apartments, 90 no. 1-bed apartments, 198 no. 2-bed apartments and 7 no. 4-bed apartments, with associated balconies / terraces for each apartment from ground floor to eighth floor levels. Block C1 featured a communal amenity room (198.5 sqm) at ground floor level and Block C2 featured a creche (332.3sqm) at ground floor level. Block C1, C2 and C3's basement features 98 no. car parking spaces (2 no. of which are mobility impaired user spaces), 568 no. bicycle parking spaces (and 114 no. parking spaces at ground floor) and a refuse store.
- Block D** Mixed-use building (8 storeys) located in the south-eastern corner of the site fronting Old Belgard Road accommodating 40 no. studio apartments, 26 no. 1-bed apartments, 76 no. 2-bed apartments and 7 no. 3-bed apartments, with associated balconies / terraces for each apartment from ground floor to eighth floor levels. Block D featured 2 no. commercial units (totaling 337.9sq.m), one of which will serve the existing Circle K Belgard petrol station which is to be retained, at ground floor level; communal amenity room 190.3 sqm) at ground floor level; and 12 no. offices (totaling 1,601.6sq.m) at first to eight floor level. Block D was served by 16 no. at-grade car parking spaces and 16 no. bicycle parking spaces at ground floor level.

Each apartment had associated private open space in the form of a ground floor terrace or a balcony and had access to 1204sqm of communal amenity space scattered throughout the development and a ground floor level public open space. These communal amenity spaces accommodated lounges, pool/table tennis rooms, cinema rooms and multi-purpose spaces.

The development was served by an underground carpark located under Block's A, B and C with access point provided for each. This will provide a total of 313 no. parking spaces (including 304 no. standard spaces and 9 no. mobility impaired user parking spaces). An additional 72 no. parking spaces were provided at ground floor level. The development was served by 2,120 no. bicycle spaces 1,896 no. resident spaces at basement level and 224 no. visitor spaces at ground floor level.

It was also proposed to construct a new road through the subject site, along the sites southern boundary, which links Cookstown Road with the Old Belgard Road, as well as 2 no. new roads through

the subject site linking Cookstown Road with the newly created through road. A new pedestrian link was proposed from Cookstown Road to the Belgard Luas Stop immediately north. More specifically, this new road and pedestrian link occupied the western part of the smaller parcel of land making up the subject site.

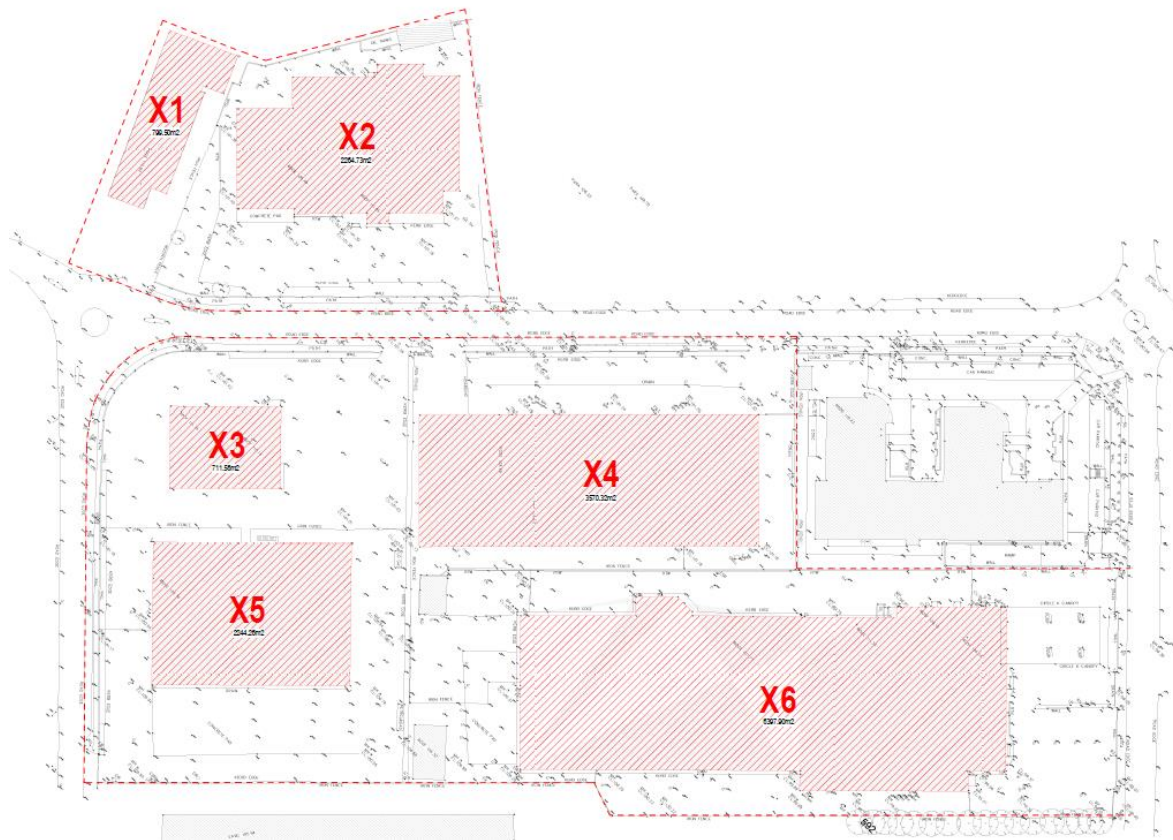


Figure 23.0 Proposed demolition plan



Figure 24.0 Proposed site plan of the proposed development

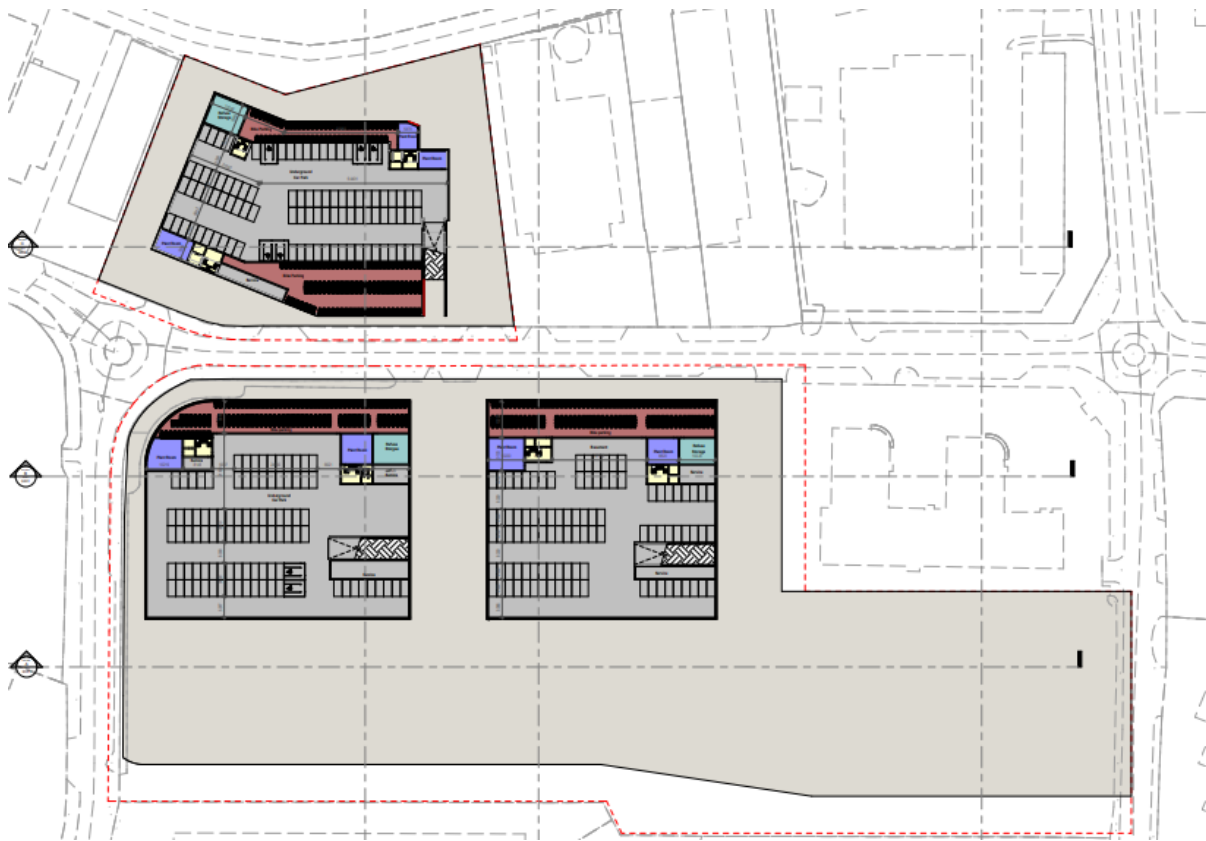


Figure 25.0 Proposed basement plan of the proposed development



Figure 26.0 Proposed ground floor plan of the proposed development



Figure 27.0 Western elevation of the proposed development as viewed from Cookstown Way



Figure 28.0 Northern elevation of the proposed development as viewed from Katherine Tynan Road

An Bord Pleanála subsequently issued a notice of Pre-Application Consultation Opinion on 29th April 2020, which identified 3 no. items to be addressed, in order for the application to constitute the reasonable basis for a Strategic Housing Application. These 3 no. items were as follows:

1. *Further consideration of the documentation as it relates to the integration of the proposed development with the regeneration of adjoining sites and the rest of the industrial estate. The documentation should demonstrate whether and how the proposed development could form part of a coherent and sustainable regeneration of the area with regard to the layout, design and height of the proposed buildings; the number, size and type of the proposed residential units; open space; and the mix of uses including the provision of supporting social and commercial services including childcare. The documentation should address the provisions of the development plan including its core strategy, and any local area plan or other planning framework that had been adopted by the planning authority before the application was made.*
2. *Further consideration of the documentation as it relates to access to the proposed development and to the streets in and around the site. The documentation should demonstrate whether the street network would provide adequate access for pedestrians and other road uses from the proposed development to public transport facilities, places of employment and commercial and social services, having regard to the principles and detailed requirements for urban streets set out in DMURS. In particular the documentation should clarify whether and how any new pedestrian access would be provided to the Luas stop at Belgard and whether and how the existing roads in the industrial estate would be altered to make them suitable to serve urban residential development. If separate cycle facilities are proposed the documentation should demonstrate whether they would comply with the National Cycle Manual and provide proper priority for cyclists over vehicles exiting from minor roads at junctions. The documentation should also provide a rationale for the proposed provision of parking for cars and bicycles.*
3. *Further consideration of the documentation as it relates to drainage and water supply having regard to the issues raised in the submissions from the county council and Irish Water.*

The Board also requested, pursuant to article 285(5)(b) of the Planning and Development Act 2000 (As amended by the Residential Tenancies Act 2016), the provision of the following specific information:

1. *A housing quality assessment which provides the specific information regarding the proposed apartments required by the 2018 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements. In particular, plans should indicate which apartments the applicant regards as having dual aspect*

and a justification should be provided for any 3-person 2-bedroom apartments. The submitted documentation should clarify which apartments are proposed to be built-to-rent and the information required under SPPR 7 of the guidelines should be submitted in respect of them. A building lifecycle report for the proposed apartments in accordance with section 6.13 of the 2018 guidelines should also be submitted.

2. *A report demonstrating compliance with the Guidelines for Planning Authorities on Urban Development and Building Heights issued by the minister in December 2018 in accordance with SPPR3 of those guidelines.*
3. *A report addressing the potential for the proposed development to affect the use of Baldonnell Aerodrome and the helipad at Tallaght Hospital.*
4. *An analysis of the daylight and sunlight that would be available to the proposed dwellings and open spaces with reference to the BRE guidance on the subject, as well as of the impact of the proposed development on adjoining sites and their development potential in this regard.*
5. *A phasing scheme for the development which would indicate how open space and access for the proposed housing would be provided in a timely and orderly manner.*
6. *A landscaping and open space strategy that shall include details of proposed boundary and surface treatments throughout the development, and of landscaping and planting. The details shall indicate the size of each open space and what persons would have access to them. They shall demonstrate how the provision and treatment of open space complies with the provisions of the development plan and the 2018 apartment design guidelines regarding amenity space.*
7. *Proposals in respect of the 110kV line at the north of the site.*
8. *A draft construction management plan.*
9. *A draft waste management plan.*

A Statement of Response to Pre-application Consultation Opinion has been prepared by Hughes Planning and Development Consultants, detailing how each of the items outlined in the pre-application consultation opinion from An Bord Pleanála have been addressed in full by the applicant and design team prior to lodgement of this application.

4.0 Planning History

4.1 Planning History of the Subject Site

This section provides a review of the planning history for the application site. A review of South Dublin County Council and An Bord Pleanála's planning registers revealed one recent planning application relating to part of the subject site. The details are as follows:

Circle K Belgard, Old Belgard Road, Tallaght, Dublin 24 (north-eastern most corner of the subject site)

Reg. Ref. SD19A/0259

Permission was granted by South Dublin County Council on 10th October 2019 for (i) Change of use from retail use to retail use with ancillary off-licence use; (ii) associated alteration of existing retail unit; (iii) all associated site and development works.

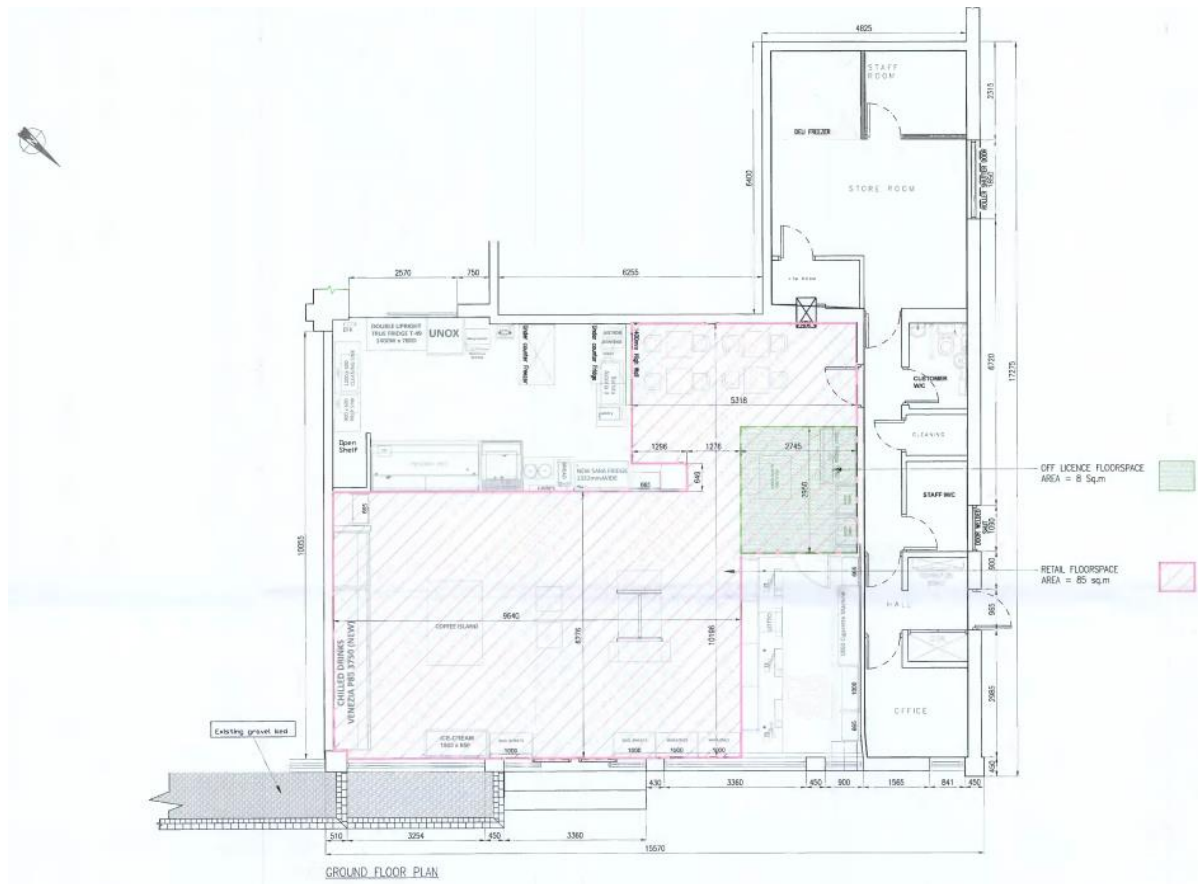


Figure 29.0 Ground floor plan of the development approved under Reg. Ref. SD19A/0259

4.2 Planning History of the Adjoining/Immediately Surrounding Land

It is considered useful to examine the planning history associated with sites in the immediate vicinity of the application site. A review of the South Dublin County Council planning register and An Bord Pleanála’s website revealed the following planning application relating to the sites immediately surrounding the subject site:

Unit 21 First Avenue, Cookstown Industrial Estate, Dublin 24 (immediately west of the subject site - Site No. 5 on map subsequently included at Figure 33.0)

ABP Case No. 303911-19

A planning application for a Strategic Housing Development was refused by An Bord Pleanála on 19th June 2019 at Unit 21 First Avenue, Cookstown Industrial Estate, Dublin 24. In summary, the proposed development involved demolition of 5,500 sqm of existing 1 and 2 storey industrial buildings (including a small operating café) and associated site clearance works, and the construction of 150 ‘Build-to-Rent’ apartments in 3 no. 5-6 storey blocks and 222 no. Shared Living units in a fourth 6-8 storey (parapet level) block. The proposal provides for a total of 725 bedspaces. The proposed development will include a retail/café unit of 92 sqm, 64 no. car parking spaces at grade, communal, public and private open space and communal resident facilities and services, a total of 488 no. sheltered bike parking spaces split into each block and an additional 98 no. visitor bike parking spaces at grade. An upgrade to the public realm, to include cycle paths and footpaths, along First Avenue and Cookstown Road adjoining the site, is also proposed.

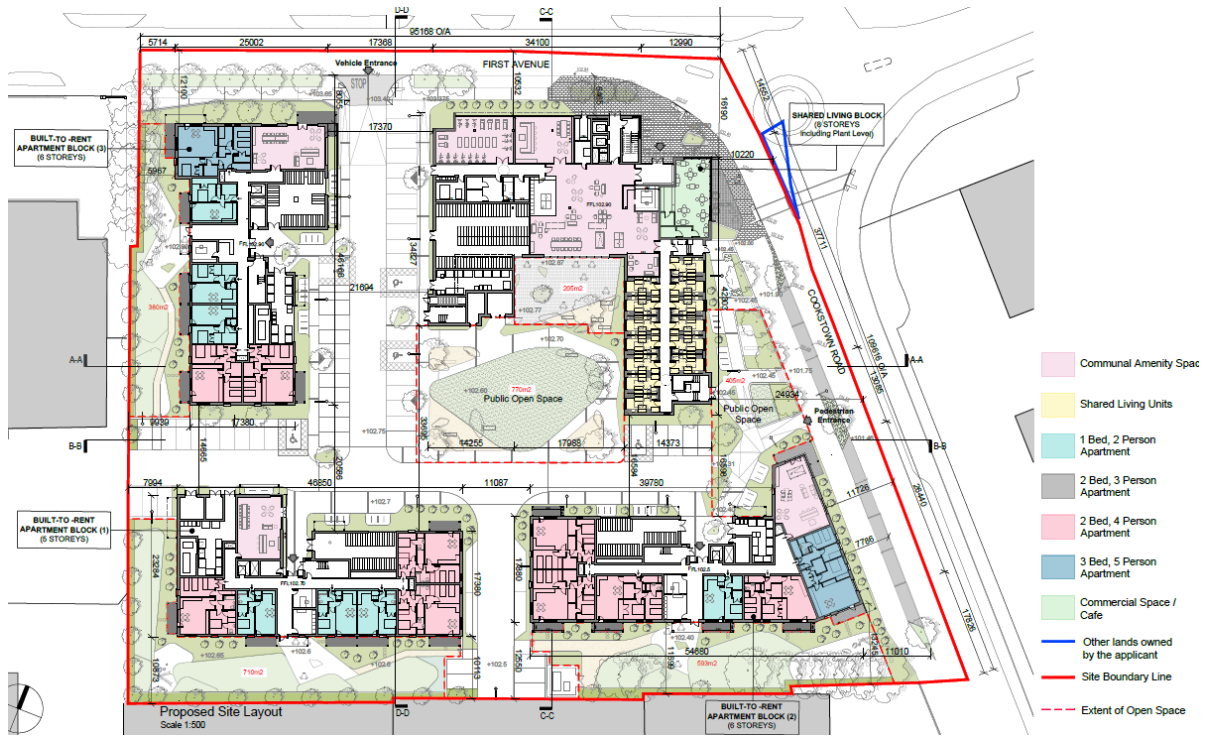


Figure 30.0 Site layout plan of the development proposed under An Bord Pleanála Case No. 303911-19



Figure 31.0 Cookstown Road contextual elevation of the development proposed under An Bord Pleanála Case No. 303911-19



Figure 32.0 First Avenue contextual elevation of the development proposed under An Bord Pleanála Case No. 303911-19

An Bord Pleanála refused this application for the following reasons:

1. *Having regard to the location of the subject site within the existing Cookstown Industrial Estate, to the established build form, uses and character of the industrial estate surrounding the site, particularly along First Avenue and Cookstown Way, and having regard to the location of the subject site at a remove from the town centre of Tallaght, it is considered that the development of a residential use at this location, in the absence of an overall strategy for the re-development of the industrial estate, and in the absence of the realisation of planned direct vehicular, and convenient cyclist and pedestrian links, to the town centre and to public transportation, would represent an uncoordinated and haphazard form of development which would give rise to an isolated piecemeal pocket of residential development that is disconnected from shops, amenities and/or residential services, contrary to section 11.2.4 of the current South Dublin County Development Plan 2016 – 2022, and would not be in accordance with an appropriate sequential development of these Regeneration (REGEN) zoned lands as a whole. The proposal would, therefore, not represent a “plan-led” residential development, would be contrary to the provisions of the statutory Development Plan, and would be contrary to the proper planning and sustainable development of the area.*
2. *It is considered that the format proposed for the shared accommodation development, with significant numbers of individual units sharing a single common living/kitchen area on each floor, and with a notable shortfall in the quantitative and qualitative provision of sufficient communal facilities, would fail to provide an acceptable living environment for future residents of the development, contrary to the Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, issued by the Department of Housing, Planning and Local Government in March 2018, and particularly paragraphs 5.15, 5.22 and 5.23 of these Guidelines. The proposed shared accommodation development would, therefore, be contrary to these Ministerial Guidelines and would seriously injure the residential amenities of future occupants/residents, and accordingly would be contrary to the proper planning and sustainable development of the area.*

Although proximate to this site, the subject proposal differs from the proposal refused at Unit 21 First Avenue. Firstly, the subject proposal does not include shared accommodation. Secondly, the subject proposal provides a direct link to the Belgard Luas Stop immediately north-east and includes shops, amenities and residential services to serve residents of the development and the surrounding area more broadly. Further to this, the subject site is much larger in size than that involved in application ABP Ref. 303911-19 and capable of establishing a self-sustaining neighbourhood with its own character. The subject proposal also includes road, junction and streetscape upgrades which will see the existing industrial setting being replaced with a more residential environment. Given the above, we would argue that the above reasons for refusal are not applicable in relation to the subject proposal.

4.3 Planning History of the Cookstown Industrial Estate /Tallaght Town Centre Area

A review of the South Dublin County Council and An Bord Pleanála's planning registers revealed the a no. of applications for large residential developments recently or currently being considered for sites in the Cookstown Industrial Estate and Tallaght Town Centre Area, more broadly.

Their location relative to the subject site are illustrated in Figure 33.0 and details of the planning applications are provided overleaf.



Figure 33.0 Planning applications recently considered or currently being considered in the Cookstown Industrial Estate/Tallaght Town Centre Area (subject site indicated with red star)

Belgard Gardens, Belgard Square North and Belgard Road, Tallaght, Dublin 24 (Site No. 1 on map at Figure 33.0)

ABP Case No. 303306-18

Permission was granted by An Bord Pleanála on 15th April 2019 for a Strategic Housing Development on lands at Belgard Gardens, Belgard Square North and Belgard Road, Tallaght, Dublin 24 (immediately east and south-east of the subject site). In summary, the proposed Strategic Housing Development involves demolition of all existing buildings and construction of a mixed use residential development (total GFA 55,180 sqm) comprising a new urban quarter and streets with 5 no. blocks to provide 438 no. apartment units (including live/work units) and associated amenity facilities, a 403 no. bedspace student accommodation scheme and associated amenity facilities, childcare facility (c.380 sqm), 6 no. retail / commercial units (c.632 sqm in total) and a security room (c.52 sqm). This will comprise phase I of the overall development of the c.7.2 ha. site and will be located on a net site area of 3.45 ha. (excluding proposed temporary car park at grade).



Figure 34.0 South contextual elevation of development proposed under An Bord Pleanála Case No. 303306

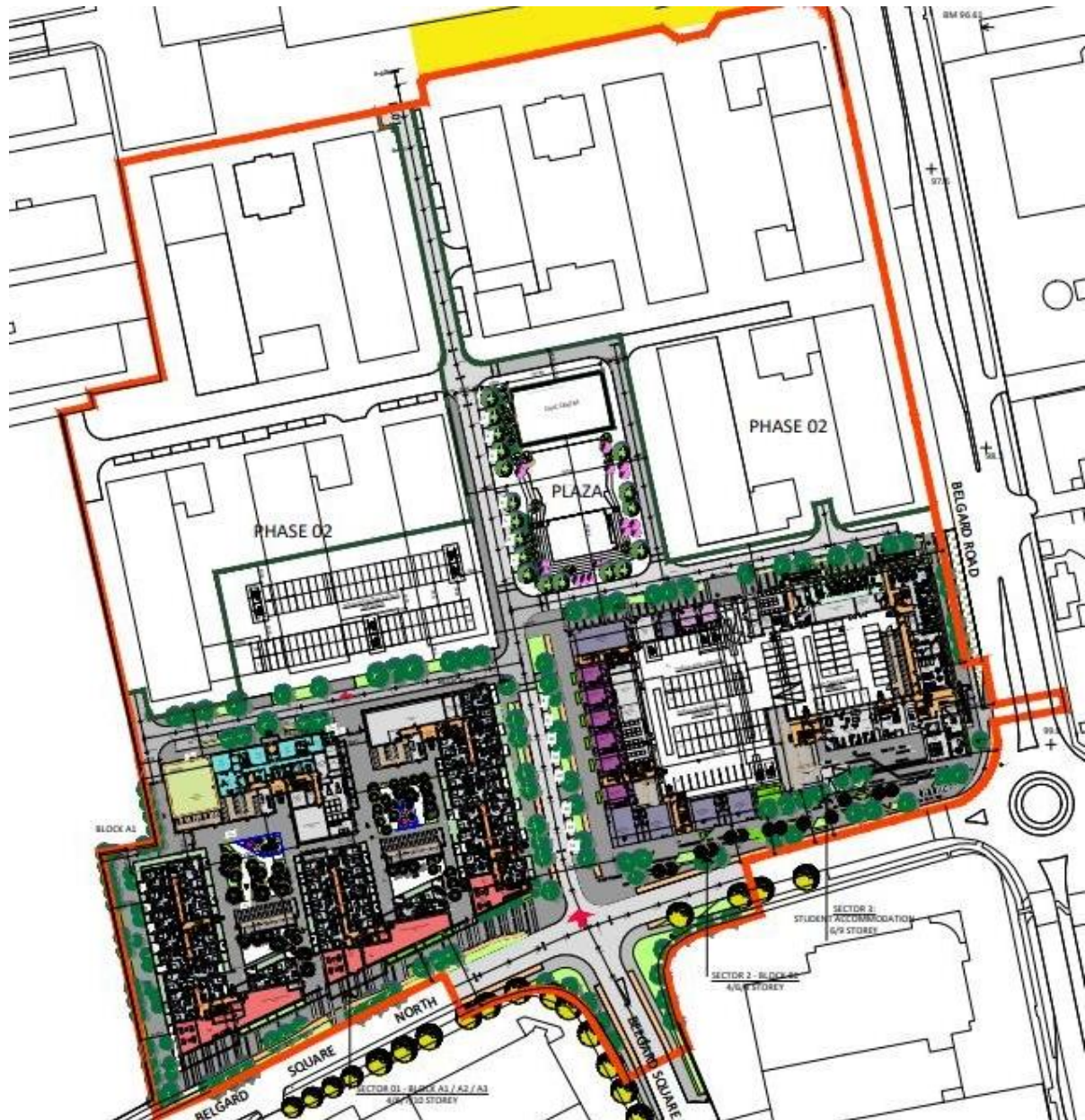


Figure 35.0 Site layout plan of development approved under An Bord Pleanála Case No. 303306-18 including the second phase of development which is to follow



Figure 36.0 Site layout plan approved under An Bord Pleanála Case No. 303306-18

The development ranged from 4 to 10 storeys in height. In the Inspector's Report, dated April 2019, it is noted that the site is suitable for the construction of 10 storeys. The Inspector states:

'In relation to urban design I consider that the site is wholly capable of establishing its own height. It addresses two public roads with suitable separation distances and in addition to the further phase of development, it effectively is a new urban quarter in the area given the size of the site. The higher elements of the proposed scheme are located at pivotal corners and junctions which create a presence for the development and way finding for the wider area. The design of the buildings which is discussed elsewhere provides that the height can be appropriately absorbed into the overall design and into the wider area. I consider therefore that in urban design terms the height strategy for the site is appropriate.'

The Inspector's Report notes that the development was in contravention of the 2006 Tallaght Town Centre Local Area Plan before noting that the Board is precluded from granting permission for development that is considered to be a material contravention, except in four circumstances. These circumstances, outlined in Section 37(2)(b), are as follows: where development is of strategic or national importance; conflicting objectives in the development plan; regional planning guidelines or guidelines under Section 28 etc. or the pattern of development permissions granted in the area since the adoption of the development plan. The Inspector's Report notes that the development is a Strategic Housing Development Application and is therefore of significant or national importance. It is noted:

'The current application has been lodged under the strategic housing legislation and the proposal is considered to be strategic in nature. Government policy as expressed within Rebuilding Ireland – The Government's Action Plan on Housing and Homelessness and the National Planning Framework – Ireland 2040 fully support and reinforce the need for urban infill residential development such as that proposed on sites in close proximity to quality public transport routes and within existing urban areas. This site would meet these requirements.'

Based on the criteria set out in Section 37(2)(b), the Inspector made the following comment regarding increased height:

‘Furthermore, as the applicant points out in their statement, National Policy 13 and 35 refer to building height and car parking being based on performance criteria and increasing density through area or site based regeneration and increased building height. Therefore, it is clear that a significant and sustained increase in housing output and apartment type development is not only necessary but is Government Policy in order to meet the need for residential units. Therefore, I consider that the proposal herein would meet the requirements of Section 37(2)(b)(i).’

In light of this decision by the Board, it is considered that the proposed development to which this report pertains, should be assessed similarly. It is submitted that the site is suitable to increased heights as described in this report and therefore should be granted permission.

Site at the corner of Airton Road and Belgard Road, Tallaght, Dublin 24 (Site No. 2 on map at Figure 33.0)

ABP Ref. ABP-305763-19 Permission was granted by An Bord Pleanála on 20th February 2020 for a Strategic Housing Development on a site at the corner of Airton Road and Belgard Road, Tallaght, Dublin 24. In summary, the proposed Strategic Housing Development involves demolition of the existing industrial buildings on site (4,800sq.m) and the construction of 2 no. blocks comprising 328 no. apartments (93 no. 1 bed, 222 no. 2 bed and 13 no. 3 bed), ancillary residential support facilities and commercial floorspace measuring 31,147sq.m gross floor space above a single basement level measuring 5,861sq.m. The development also consists of the provision of a landscaped courtyard; public plaza at the corner of Airton and Belgard Road; pedestrian access from Airton Road to the Technological University campus; 184 no. car parking spaces at basement level including 14 no. club car spaces, 10 no. disabled parking spaces and 4 no. crèche parking spaces; 727 no. basement and surface bicycle parking spaces; 4 no. motorbike parking spaces; bin storage; boundary treatments; green roofs; hard and soft landscaping; plant; lighting; Vodafone cabin sub-station; ESB sub-stations, switch rooms and generators; and all other associated site works above and below ground.



Figure 37.0 Northern elevation (fronting Airton Road) approved under ABP Ref. ABP-305763-19

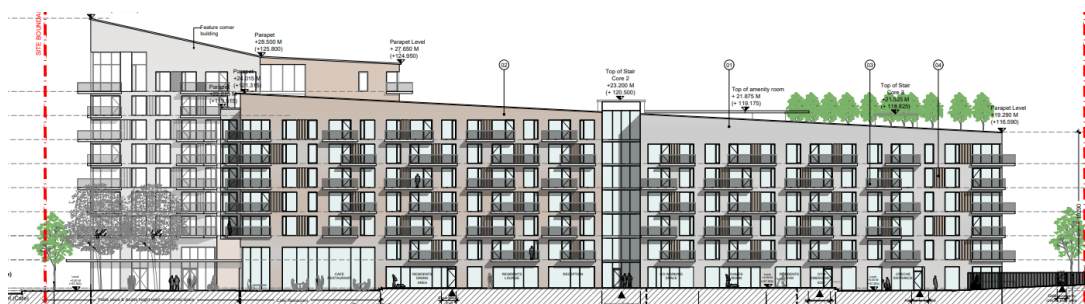


Figure 38.0 Western elevation (fronting Belgard Road) approved under ABP Ref. ABP-305763-19

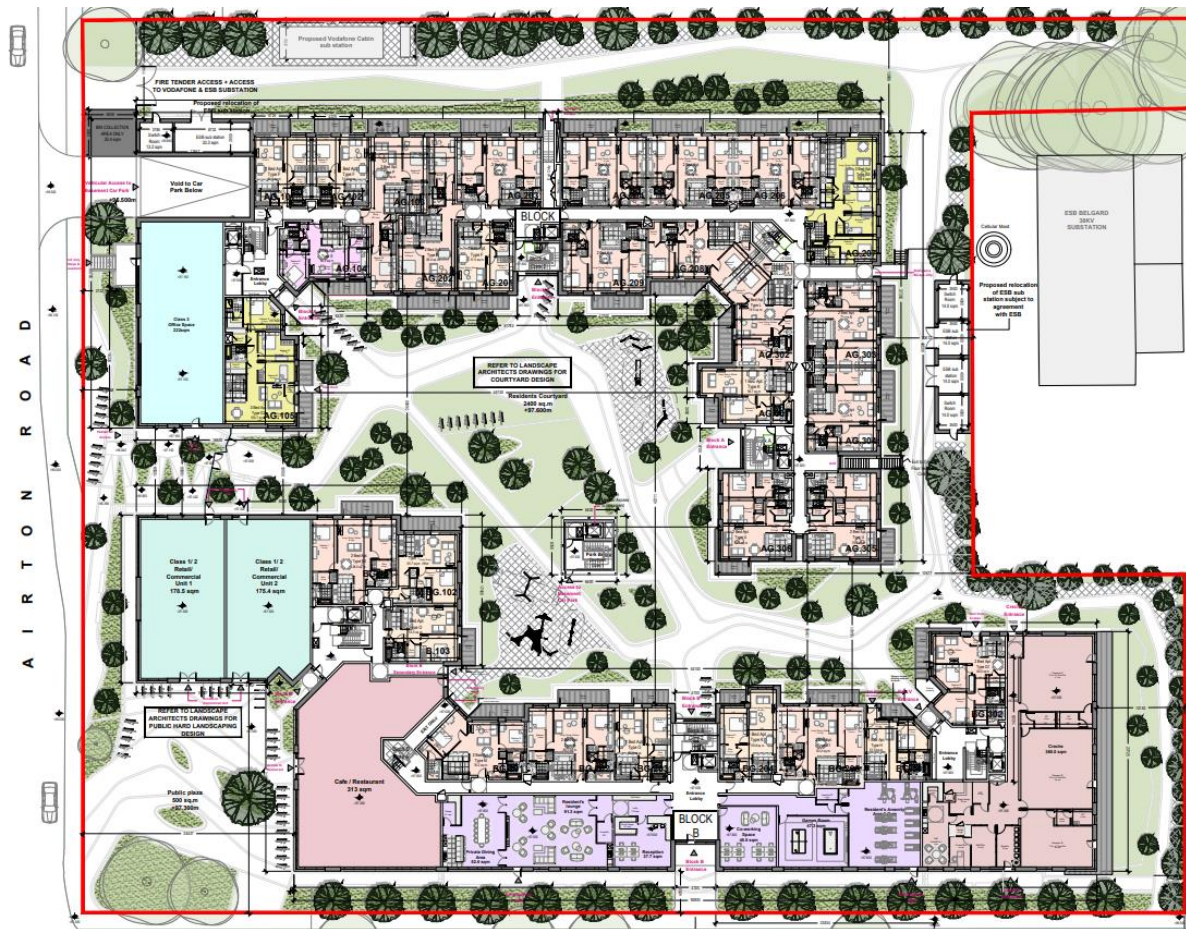


Figure 39.0 Ground floor layout plan approved under ABP Ref. ABP-305763-19

This planning permission remains in force until 2025 and sets a precedent for the construction of suitably designed residential developments in this area.

Former Gallaher's cigarette factory site at the junction of Airton Road & Greenhills Road, Tallaght, Dublin 24 (Site No. 3 on map at Figure 33.0)

ABP Ref. ABP-306705-20 Permission was granted by An Bord Pleanála on 16th June 2020 for a Strategic Housing Development at the Former Gallaher's cigarette factory site at the junction of Airton Road & Greenhills Road, Tallaght, Dublin 24. In summary, the proposed Strategic Housing Development involves: demolition of existing factory/warehouse buildings on site (total floor area c.10,076.8 sqm); construction of 502 no. apartments (comprising 197 no. 1-bed; 257 no. 2-bed; and 48 no. 3-bed units) within 6 no. 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 no. retail units, creche, and services/bin store areas (total non-residential floor area c.1,839 sq.m); a total of 202 no. car parking spaces (at basement and undercroft levels) and 584 no. bicycle parking spaces; vehicular/pedestrian/cyclist accesses from Greenhills Road and Airton Road. Provision of road improvements and pedestrian crossings; and all associated site development works and services provision.



Figure 40.0 Contextual Site Elevation (Greenhills Road) approved under ABP Ref. ABP-306705-20



Figure 41.0 Contextual Site Elevation (Airton Road) approved under ABP Ref. ABP-306705-20



Figure 42.0 Ground floor layout plan approved under ABP Ref. ABP-306705-20

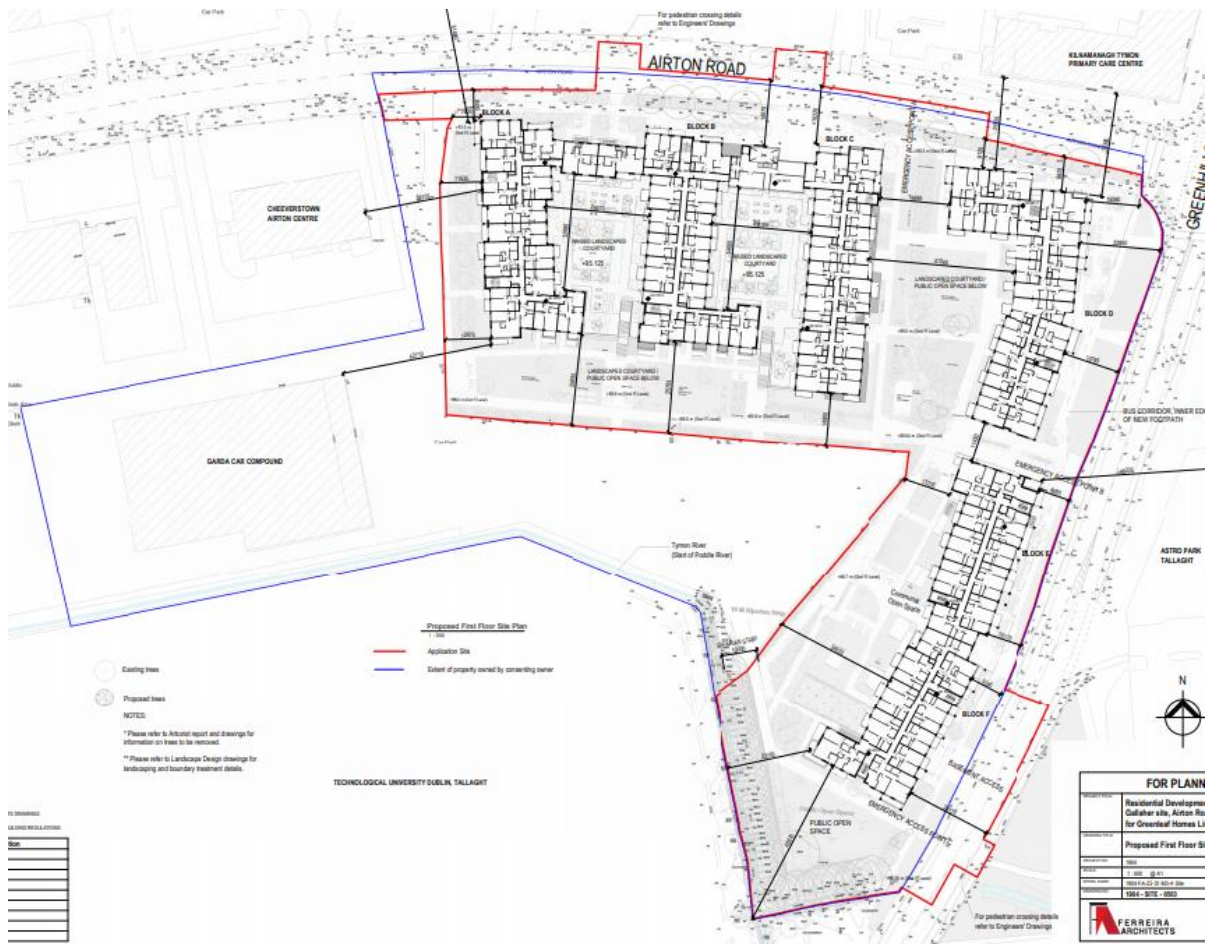


Figure 43.0 First floor layout plan approved under ABP Ref. ABP-306705-20

This planning permission remains in force until 2025 and sets a precedent for the construction of suitably designed residential developments in this area. It is worth noting that the subject proposal adopts a similar car parking and open space arrangement as that proposed for Blocks A, B and C approved under ABP Ref. ABP-306705-20.

Unit 5A-C Second Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24 (Site No. 4 on map at Figure 33.0)

ABP Case No. 303803-19

Permission was granted by An Bord Pleanála on 25th July 2019 for a Strategic Housing Development Unit 5A-C Second Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24. In summary, the proposed Strategic Housing Development involves demolition of the existing 2,590sq.m industrial building and the construction of a ‘build-to-rent’ housing development providing a total of 196 no. residential apartments (comprising 45 no. studio units, 48 no. one-bed units, 8 no. two-bed (3-person) units and 95 no. two-bed (4-person) units) in 4 no. six-nine storey blocks over basement. The development also includes 1 no. commercial unit (248sqm), 1 no. office unit (111sqm); a crèche (192sqm); a gym (18sqm); 6 no. communal amenity spaces (totalling 286sqm); a communal hot desk room (25sqm); and 3 no. communal secure storage areas (totalling 31sqm); along with a ground floor level landscaped courtyard, 408 no. bicycle spaces (308 no. resident spaces at basement level and 100 no. visitor spaces at ground floor level); an underground carpark (accessed from Second Avenue, providing a total of 67 parking spaces (including 61 no. standard spaces and 6 no. mobility impaired user parking spaces)) and refuse/waste/recycling stores.



Figure 44.0 Ground floor plan of development approved under ABP Case No. 303803-19

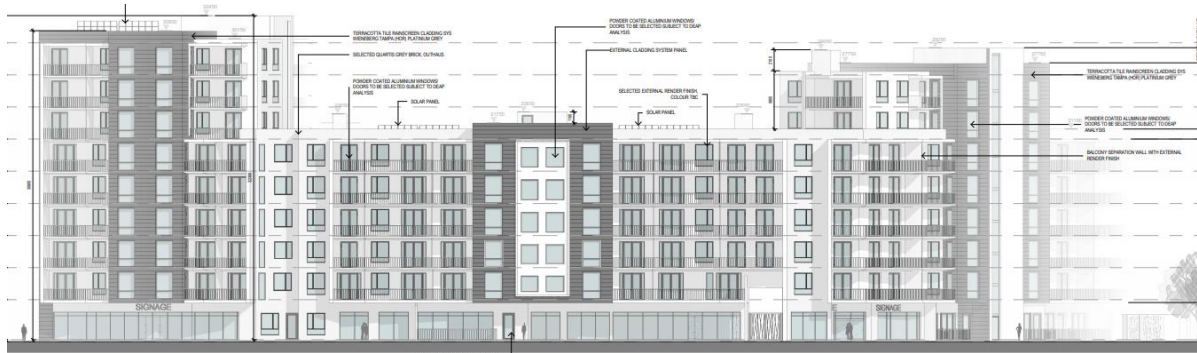


Figure 45.0 Western elevation (fronting onto Cookstown Way) of development approved under ABP Case No. 303803-19



Figure 46.0 Northern elevation (fronting onto Second Avenue) of development approved under ABP Case No. 303803-19

This planning permission remains in force until July 2024 and sets a precedent for the construction of suitably designed residential developments in this area.

Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate, Dublin 24 (Site No. 6 on map at Figure 33.0)

Application No. 1

ABP Ref. ABP-305725-19

Permission was refused by An Bord Pleanála on 13th February 2020 for a Strategic Housing Development on the subject site. The proposed development, as per the description contained within the statutory planning notices, was for: (i) Demolition of the existing industrial buildings (2,518sq.m); (ii) construction of a ‘build-to-rent’ housing development providing a total of 245 no. residential apartments (comprising 69 no. studio units, 56 no. one-bed units and 120 no. two-bed units) in a six to eleven storey building over basement. Each apartment has associated private open space in the form of a ground floor terrace or a balcony and has access to 21 no. communal amenity spaces (totalling 880sqm), including a communal gym (82.5sqm), and a ground floor level landscaped courtyard. The development is served by an underground carpark (accessed from the Cookstown Road extension currently under construction) providing a total of 79 no. parking spaces (including 75 no. standard spaces and 4 no. mobility impaired user parking spaces), and 468 no. bicycle spaces (388 no. resident spaces at basement level and 80 no. visitor spaces at ground floor level in the central courtyard and on street); (iii) 2 no. commercial units (comprising

129.4sqm and 126.5sqm and accommodating Class 1, 2 and 8 uses as per the Planning and Development Regulations, 2001-2019, as amended) at ground floor level; and (iv) associated site and infrastructural works are also proposed which include: foul and surface water drainage; attenuation tanks; lighting; landscaping; boundary fences; plant areas; ESB substations; internal hard landscaping, including footpaths and street furniture; and all associated site development works.

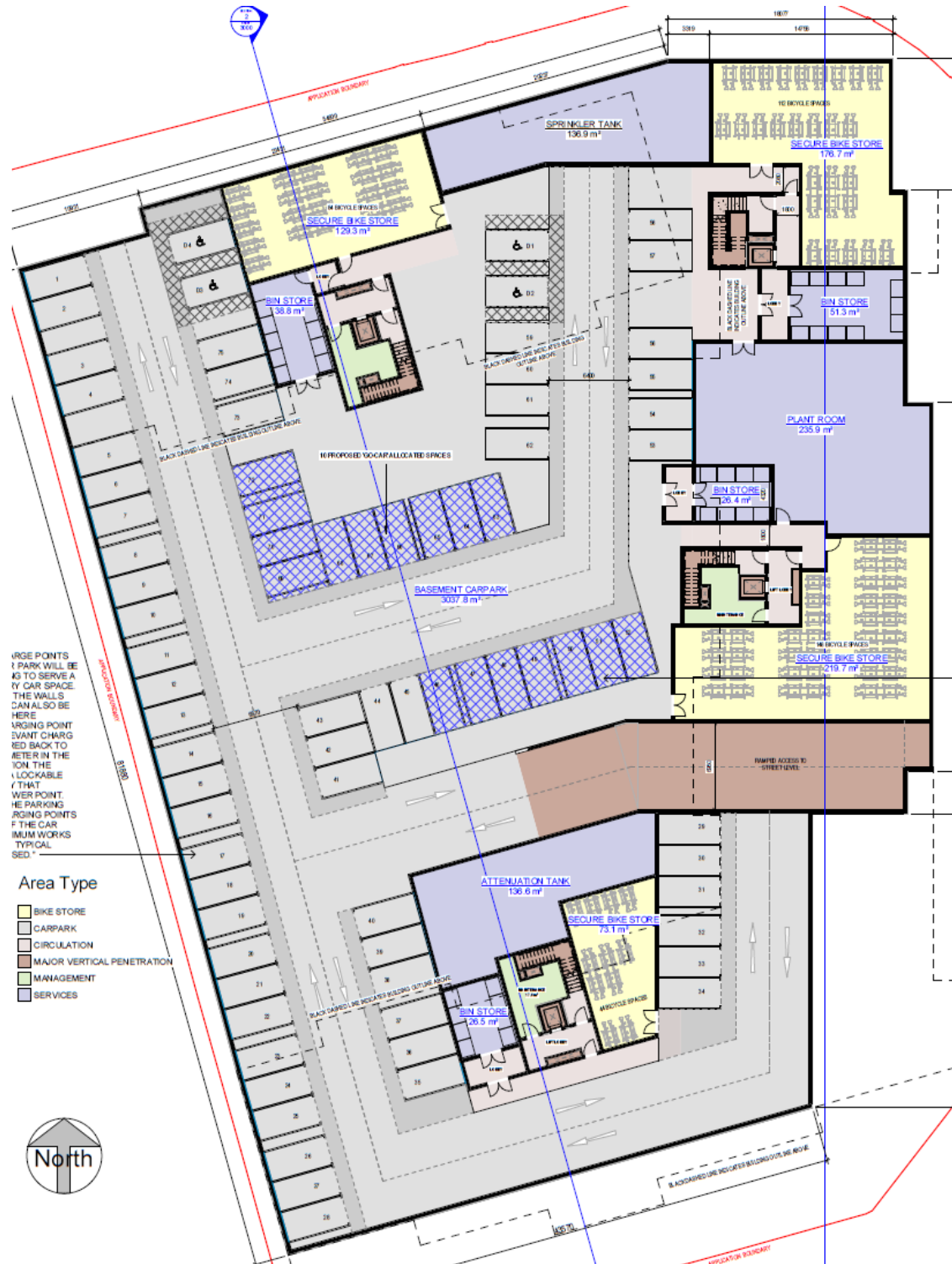


Figure 47.0 Basement plan of proposed development under ABP Ref. ABP-305725-19

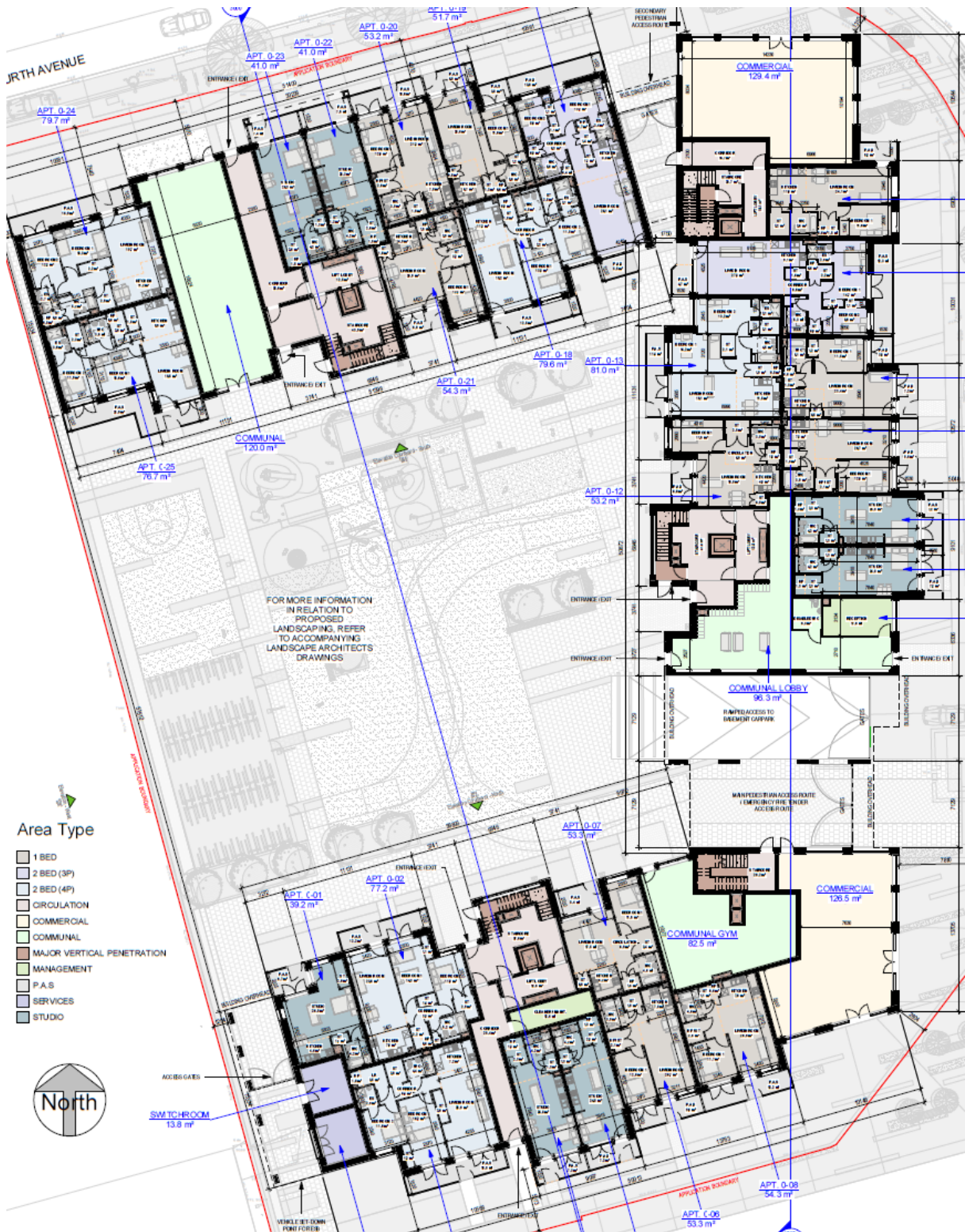


Figure 48.0 Ground floor plan of proposed development under ABP Ref. ABP-305725-19



Figure 49.0 Typical upper floor plan of proposed development under ABP Ref. ABP-305725-19

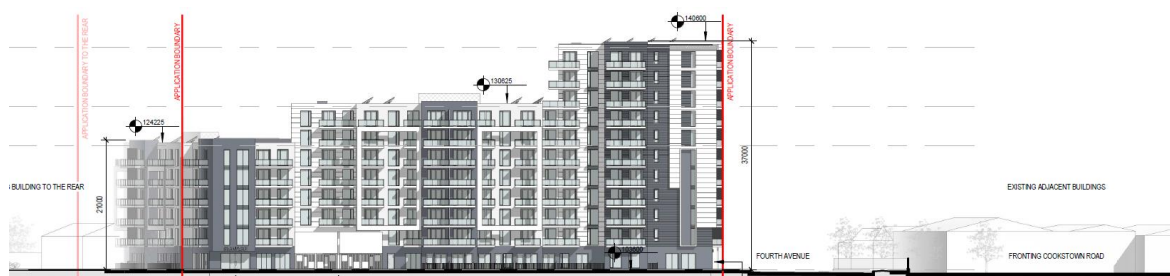


Figure 50.0 East contextual elevation of proposed development under ABP Ref. ABP-305725-19



Figure 51.0 North contextual elevation of proposed development under ABP Ref. ABP-305725-19

The Reasons and Considerations for refusing the application, as set out in the Board Order dated 13th February 2020, were as follows:

1. *Having regard to the situation of the site in the Cookstown Industrial Estate and to the established built form, uses and character of the estate in its immediate vicinity, it is considered that the proper development of the site in accordance with the criteria set out in section 11.2.4 of the South Dublin County Development Plan 2016 – 2022 requires the adoption of a planning framework for the local area. In the absence of such a framework that would determine the layout of streets and spaces in the immediate vicinity of the site and address the layout, height and design of buildings and the proportion and location of various uses there, a grant of permission for the proposed development would be premature and would unduly prejudice the regeneration of adjoining land. This would be contrary to the proper planning and sustainable development of the area.*
2. *The proportion of single aspect apartments in the proposed development would contravene SPPR 4 of the Guidelines for Planning Authorities on the Design of New Apartments issued by the minister in March 2018 and the proposal for some of those apartments to face predominantly to the north without overlooking a significant amenity would contravene the advice at section 3.18 of those guidelines. The application did not include proposals regarding the use and management of supporting communal and recreational amenities that were sufficiently detailed to discharge the requirement at SPPR 7 (b) of the guidelines. The proposed development does not include proposals for childcare facilities, contrary to the advice at 3.3.1 of the Guidelines for Planning Authorities on Childcare Facilities issued by the minister in June 2001. The proposed development would therefore fail to provide its residents with an adequate level of residential amenity and would be contrary to guidelines issued to planning authorities under section 28 of the Planning and Development Act 2000, as amended.*
3. *The disposition of the proposed development on the site would not provide an adequate set back from the boundary to the south and, therefore, would inhibit the development potential of the adjoining vacant zoned land. This would be contrary to the proper planning and sustainable development of the area.*

It is worth noting that the subject proposal differs greatly from the proposal refused at Units 66 & 67 Fourth Avenue. Firstly, the subject proposal has been lodged following the adoption of the Tallaght Town Centre Local Area Plan 2020-2026 and has been prepared having regard to objectives and policies contained therein (as discussed subsequently in Section 6.15). Secondly, the subject proposal is devoid of north facing single aspect apartments and provides 50% dual aspects apartments which is in excess of that required by the Design Standards for New Apartments - Guidelines for Planning Authorities, 2018. The proposed development also features a childcare facility. These factors, in addition to the extensive residential support facilities and services/amenities featuring in the proposed development, will provide future residents with a high level of residential amenity. The application is accompanied by a BTR Operational Management Plan, prepared by Liv Consult which details how the supporting communal and recreational amenities will be used and managed. Finally, the subject proposal adopts generous setbacks from adjacent/abutting site to ensure their development potential is not impacted upon. Further to this, the subject proposal includes road, streetscape and junction upgrades as well as public open space areas and pedestrian/cycle links to the Belgard Luas stop which will benefit the sites surrounding the subject site.

Application No. 2

ABP Ref. ABP-308398-20

An Bord Pleanála recently considered a planning application for a Strategic Housing Development at Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate, Dublin 2. The proposed development, as per the description contained within the statutory planning notices, was for: (i) Demolition of the existing industrial buildings (2,518sq.m); (ii) construction of: (a) 252 no. 'build-to-rent' apartments (comprising 50 no. studios, 96 no. one-bed apartments; 100 no. two-bed apartments and 6 no. three-bed apartments) in a two to nine storey development. Each apartment has associated private open space in the form of a ground floor terrace or a balcony and has access to 613sqm 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); 1792sqm of external communal amenity space at first and second floor levels; and a 65sqm 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 no. parking spaces (including 58 no. standard spaces, 10 no. go-car spaces and 5 no. mobility impaired user parking spaces) and 500 no. bicycle spaces at ground floor level (372 no. resident spaces and 128 no. visitor spaces); and (b) 2 no. commercial units (comprising of a 95sqm unit accommodating a café/restaurant and a 145sqm unit accommodating Class 1, 2 and 8 uses as per the Planning and Development Regulations, 2001-2019, as amended) and a 275sqm crèche, with associated 86sqm play area, at ground floor level; (iii) road, junction and streetscape upgrade works along Fourth Avenue and Cookstown Road, including the installation a signalized junction at the intersection of Fourth Avenue and Cookstown Road; (iv) Construction of a temporary access road along the southern site boundary; and (v) associated site and infrastructural works are also proposed which include: foul and surface water drainage; attenuation tanks; lighting; landscaping; boundary treatment; plant areas; ESB substations; and all associated site development works.

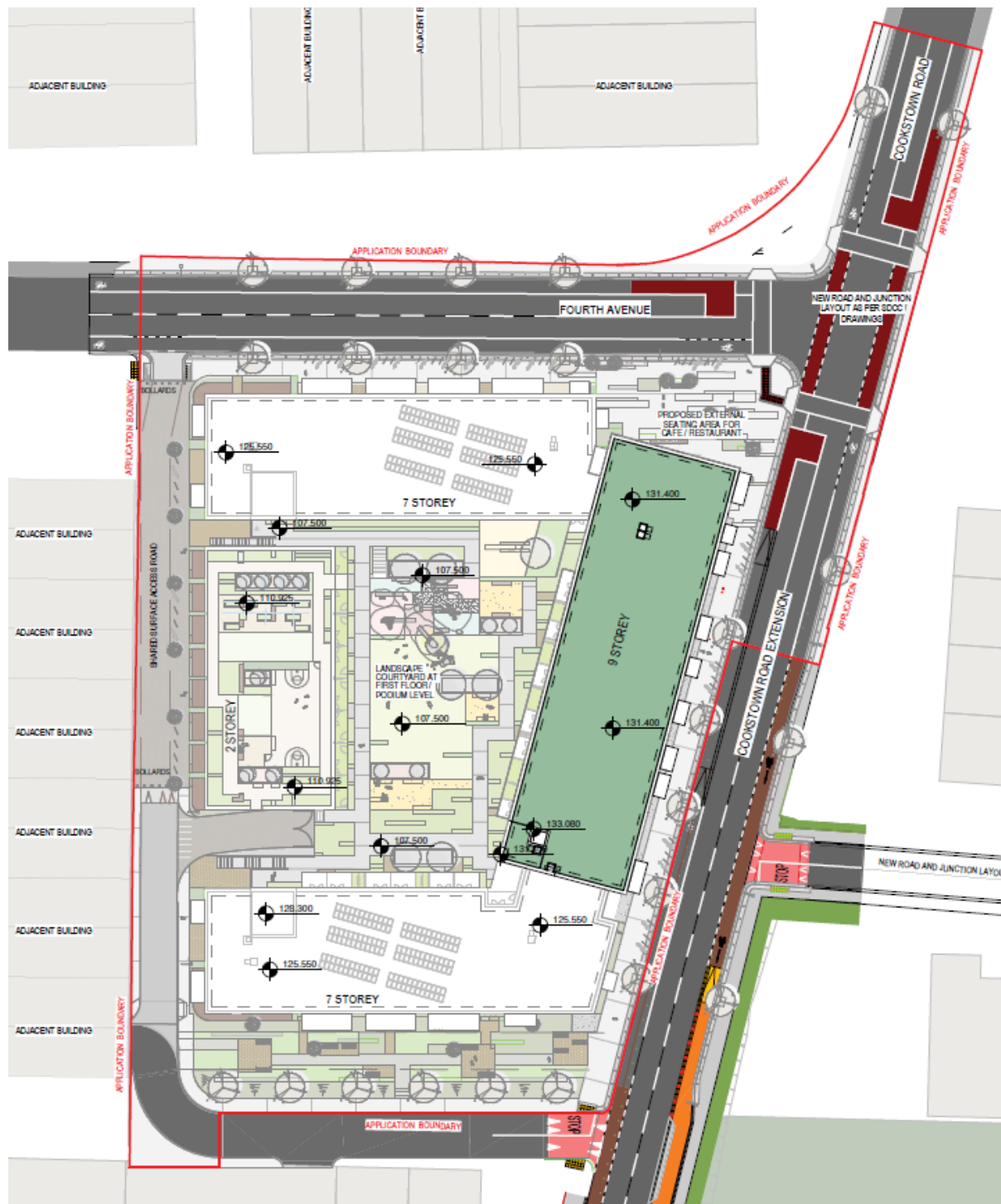


Figure 52.0 Site layout plan of proposed development under ABP Ref. ABP-308398-20

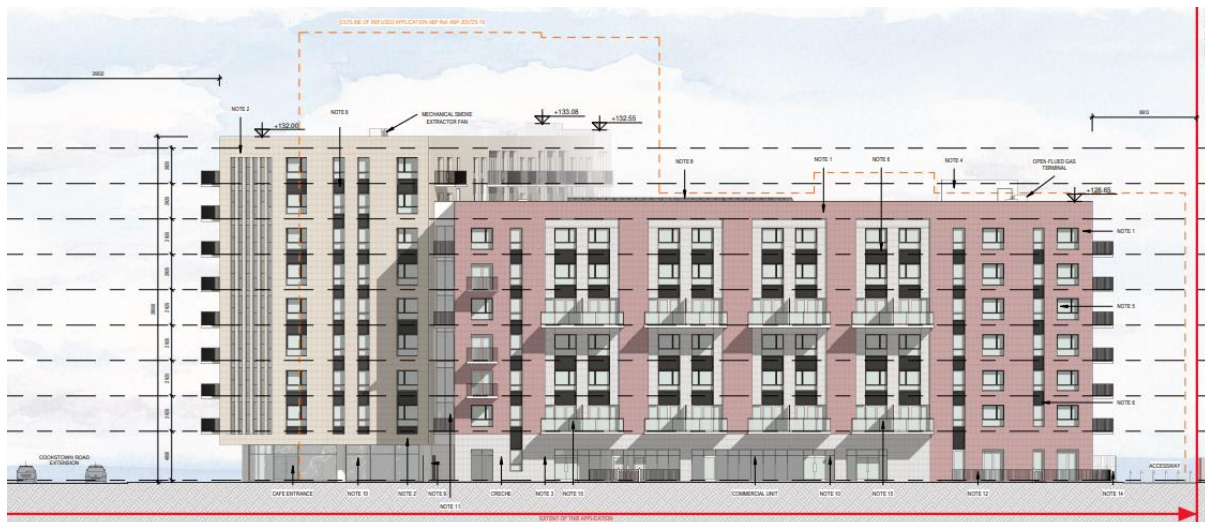


Figure 53.0 Northern elevation of the proposed development under ABP Ref. ABP-308398



Figure 54.0 Eastern elevation of the proposed development under ABP Ref. ABP-308398

An Bord Pleanála granted planning permission on 28th January 2021, subject to 30 no. conditions, including Condition No. 2 which required changes to the building height of Blocks A and B and the relocation of the proposed creche.

In recommending the planning application be granted permission as lodged, the Inspectors Report included the following positive commentary regarding the scale and density of the proposed development and the suitability of the area for 'Build-to-Rent' apartments:

10.1.16Chapter 2 of the *Design Standards for New Apartments Guidelines, 2020* notes that it is necessary to significantly increase housing supply, and City and County Development Plans must appropriately reflect this and that apartments are most appropriately located within urban areas, and the scale and extent should increase in relation to proximity to public transport as well as shopping and employment locations. The apartments guidelines identify accessible urban locations as sites within a 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. Having regard to the sites location, approx. 600m from the Hospital and Tallaght Luas stop and its proximity to urban centres, employment locations and urban amenities it is my opinion that the proposed development complies with national guidance for increased scale and density.

10.2.4. The aim of both Objective RE3 and RE4 is to support an appropriate balance of tenure in the LAP area. Having regard to the recently approved 'Build to Sell' residential schemes in the vicinity of the site, as outlined above in Planning History, and the traditional housing stock within the vicinity of the site, it is my view that the proposed BTR scheme, which

would provide a professionally managed scheme, is acceptable in this instance and would contribute to the mix of tenure within the LAP area. While the ambition of the LAP to increase the provision of owner-occupied units is acknowledged, this is not a policy of the plan. Therefore, it is my view that the proposed contravention of the LAP with regard housing tenure would not be a material.

10.2.9. In conclusion, having regard to the sites location in close proximity to large employment and education centres, services and facilities within Tallaght Town Centre and to public transport, it is my view that the proposed Build to Rent scheme is appropriate in this instance as it would provide an additional housing tenure in the wider Tallaght area which is professionally managed and would support the provision of long-term residents.

Belgard Square North, Tallaght, Dublin 24 (Site No. 7 on map at Figure 33.0)

Reg. Ref. SD208/0007

South Dublin County Council have made an application under Part 8, Article 81 of the Planning and Development Regulations, 2001 (as Amended), in relation to a site at Belgard Square North, Tallaght, Dublin 24 for the: construction of 133 affordable rental apartments with a community facility (c.12,918sq.m) in three blocks ranging from three to eight storeys with associated balconies/ terrace for each apartment and roof mounted solar panels linked by a single storey podium.

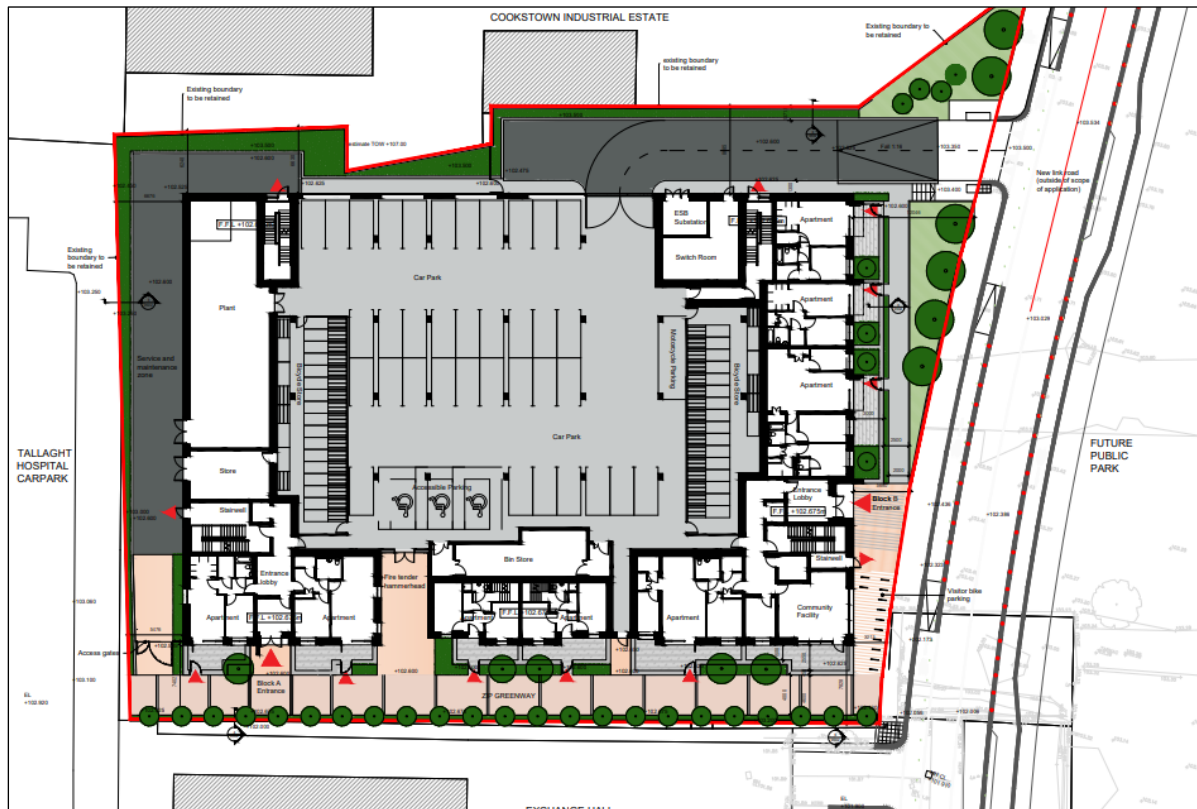


Figure 55.0 Site layout plan of proposed residential development under Reg. Ref. SD208/0007

A decision is due on this application in early 2021.

As illustrated in the above discussion as well as in the masterplan diagram, prepared by C+W O'Brien Architects, which accompanies this application (an excerpt of which was previously included at Figure 6.0), the character and built form of the Cookstown Industrial Estate is set to continue to evolve from industrial use to residential use over the coming years as these permissions are acted upon.

3.4 Precedent Examples

A review of the South Dublin County Council and An Bord Pleanála’s planning registers revealed the following applications for developments with similar car parking and open space arrangements to that proposed on the subject site.

St. Edmunds, St. Lomans Road, Palmerstown, Dublin 20

ABP Ref. ABP-305857-19 Permission was granted by An Bord Pleanála on 6th March 2020 for a Strategic Housing Development at St. Edmunds, St. Lomans Road, Palmerstown, Dublin 20. In summary, the development involved construction of 252 no. residential units (5 no. houses, 247 no. apartments) in 3 no. blocks, a creche and associated site works. Of particular note is the 225 no. car parking spaces, 5 no. motorcycle parking spaces and 308 no. secure bike parking spaces serving the development, of which 145 no. car parking spaces are provided as undercroft (Block 1).

The subject proposal adopts a similar undercroft car parking arrangement and first floor landscaped courtyard as that approved under ABP Ref. ABP-305857-19.



Figure 56.0 Ground floor plan of Block 1 approved under ABP Ref. ABP-305857-19



Figure 57.0 First floor plan of Block 1 approved under ABP Ref. ABP-305857-19

Lands immediately east of the Assumption National School, Long Mile Road, Walkinstown, Dublin 12

ABP Ref. ABP-304686-19

Permission was granted by An Bord Pleanála on 18th September 2019 for a Strategic Housing Development at Lands immediately east of the Assumption National School, Long Mile Road, Walkinstown, Dublin 12. In summary, the development involved construction of 153 no. residential units (comprising of 15 no. Duplex/Maisonettes and 138 no. apartments) and associated site works. Of particular note, the development will have 129 no. car parking spaces, 5 no. motorbike parking spaces 198 no. secure bike parking spaces, the majority of which will be at undercroft level, with 2 no. disabled car parking spaces and 4 no. car parking spaces at grade to the front of the development along with some visitor cycle parking spaces.



Figure 58.0 Ground floor plan approved under ABP Ref. ABP-304686-19

5.0 Proposed Development

The proposed development, as designed by C+W O'Brien Architects, comprises the demolition of existing industrial units/buildings (totalling 15,989sq.m) and the construction of a mixed-use development, featuring 1104 no. Build-to-Rent apartments (132 no. studios, 475 no. 1-bed apartments, 208 no. 2-bed apartments, 244 no. 2-bed duplex units and 45 no. 3-bed apartments), 4 no. commercial units (totalling 762sqm and comprising of 2 no. in Block B accommodating a cafe/restaurant/bar, 1 no. in Block D serving the existing Circle K Belgard petrol station which is being retained and 1 no. in Block D accommodating Class 1, 2 and 8 uses as per the Planning and Development Regulations, 2001-2019, as amended), 1,500sqm of office space and a 245sqm crèche in 4 no. blocks varying in height from four to eleven storeys (totalling 91,282sq.m). The proposed development retains the existing petrol station (associated with Circle K Belgard) located in the north-eastern corner of the subject site.

The proposed scheme has a housing density of 221 dwellings per Ha, a plot ratio of 2.4 and a site coverage of 31% (22% excluding the landscaped podium over the carpark). These figures are calculated based on the area in the ownership of the Applicant rather than the entire application site boundary (please see the Schedule of Accommodation, prepared by C+W O'Brien Architects, for further information on the plot ratio calculation for the scheme).



Figure 60.0 Proposed demolition plan



Figure 61.0 Proposed site plan of the proposed development

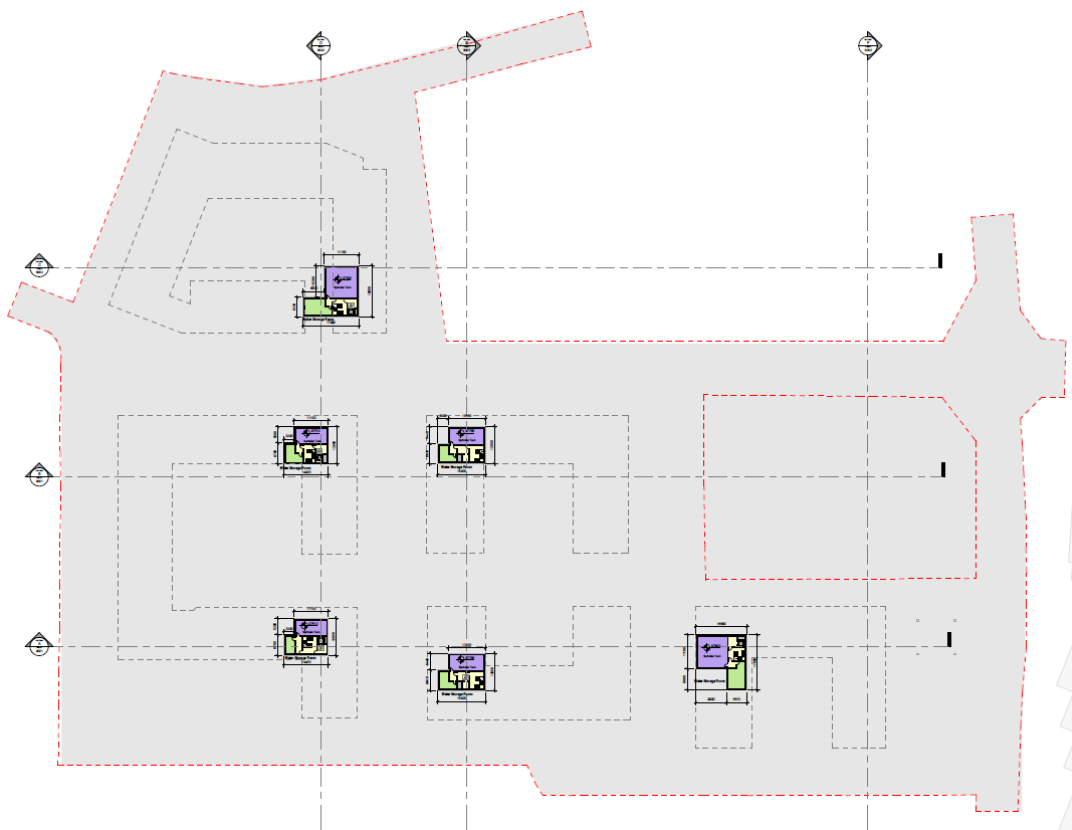


Figure 62.0 Basement plan of the proposed development (basements for services only)

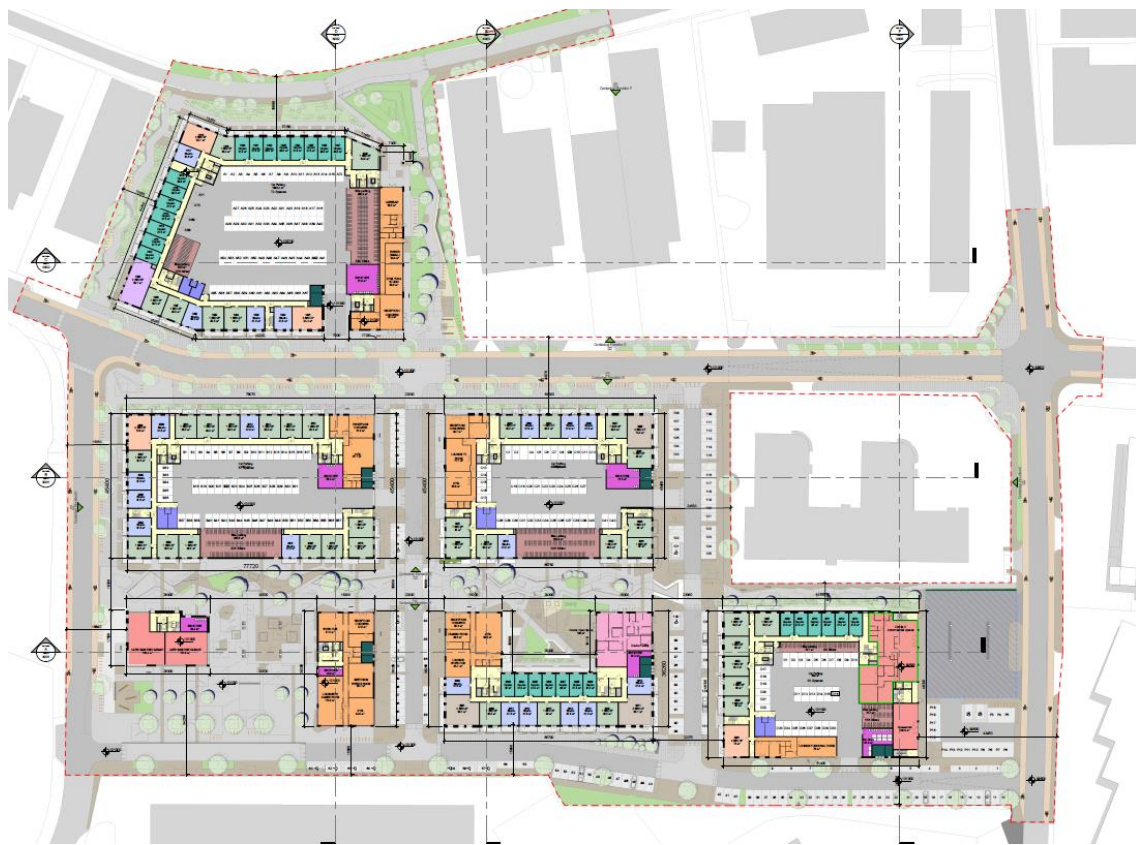


Figure 63.0 Ground floor plan of the proposed development



Figure 64.0 First floor plan of the proposed development

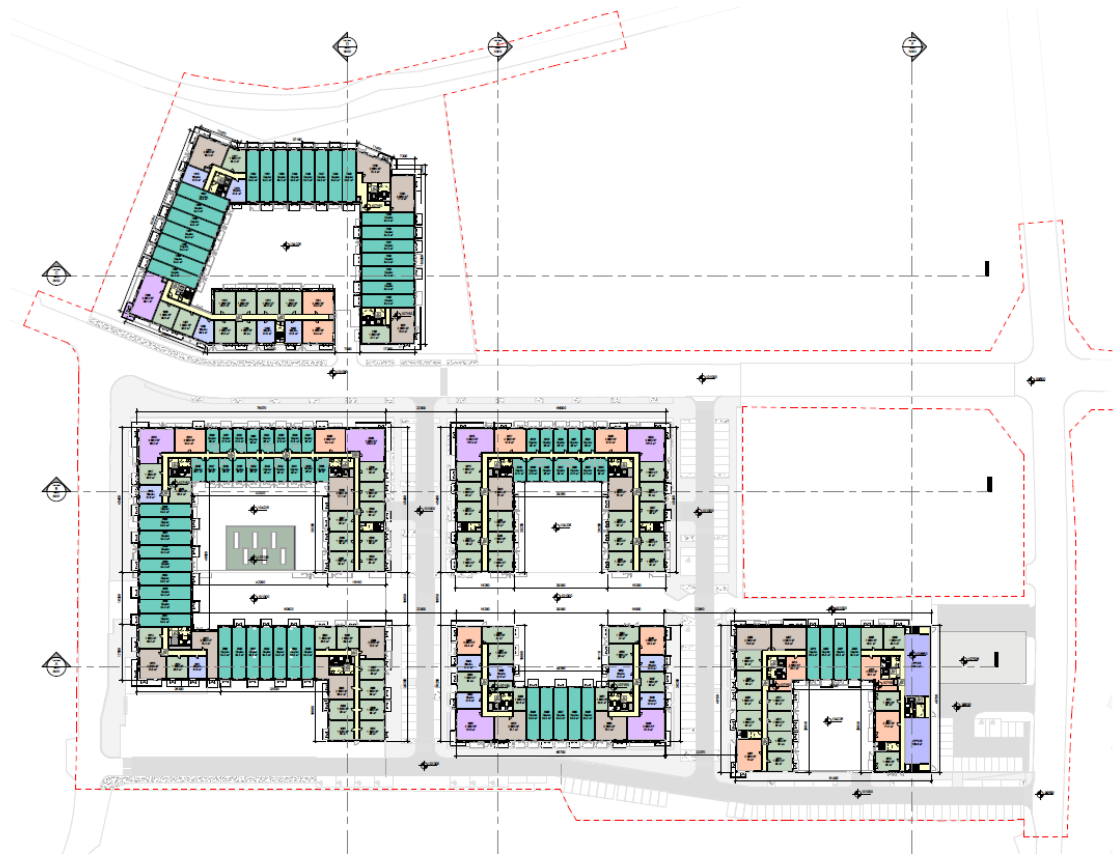


Figure 65.0 Second floor plan of the proposed development

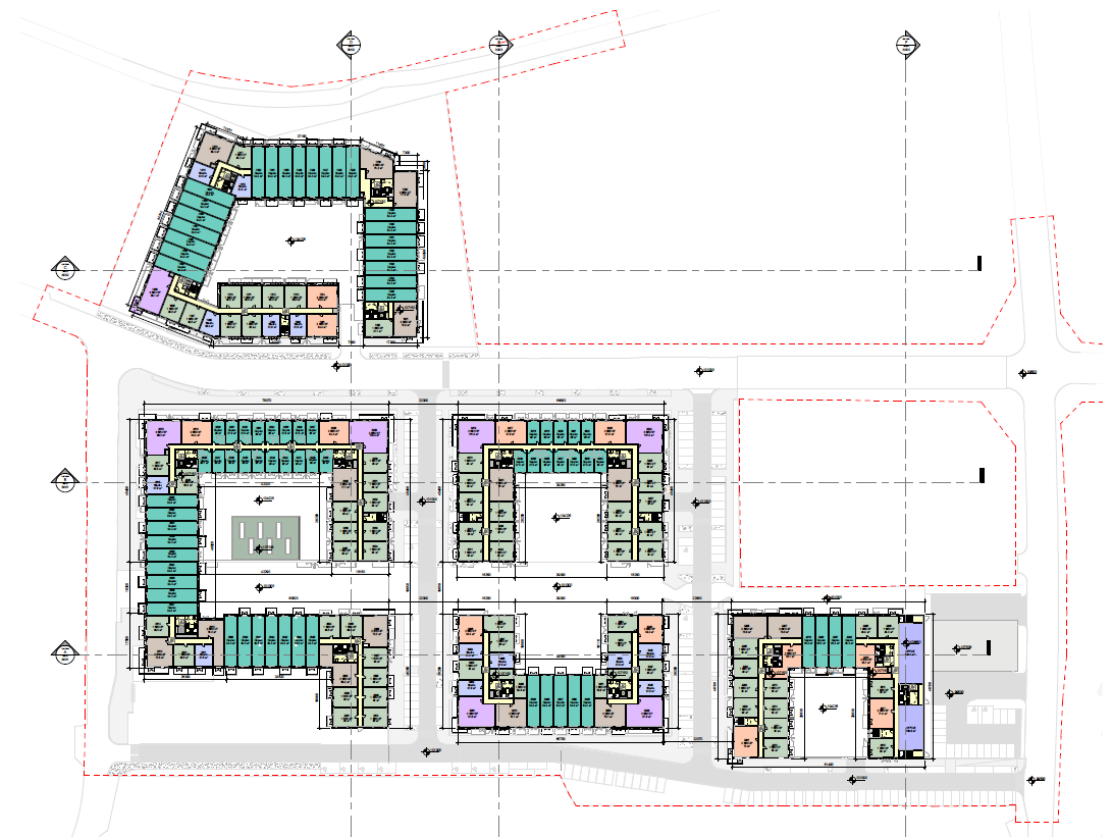


Figure 66.0 Third floor plan of the proposed development

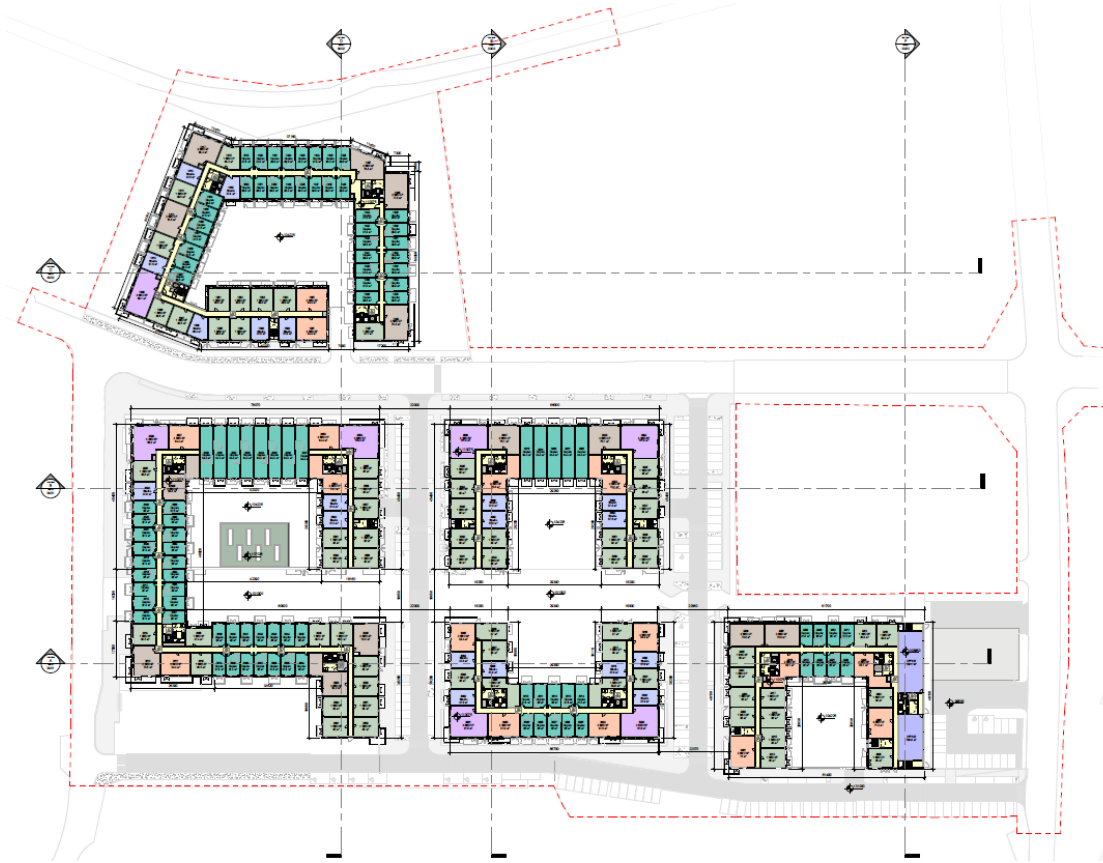


Figure 67.0 Fourth floor plan of the proposed development

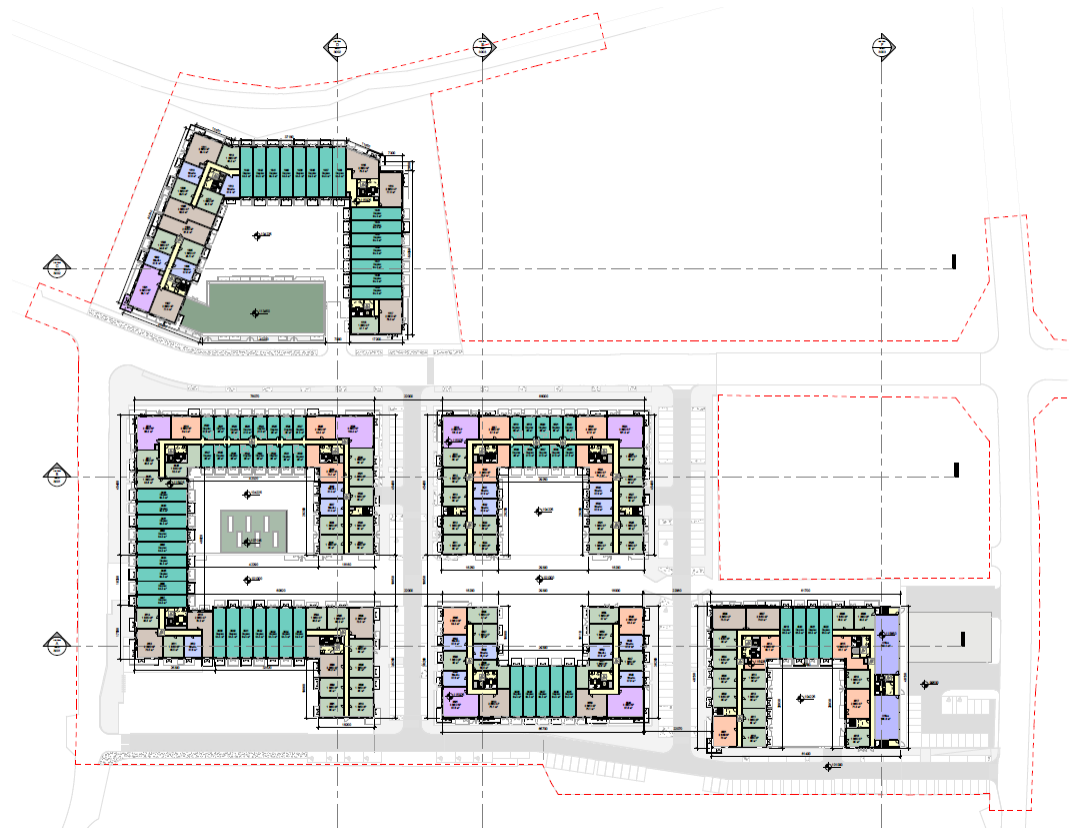


Figure 68.0 Fifth floor plan of the proposed development

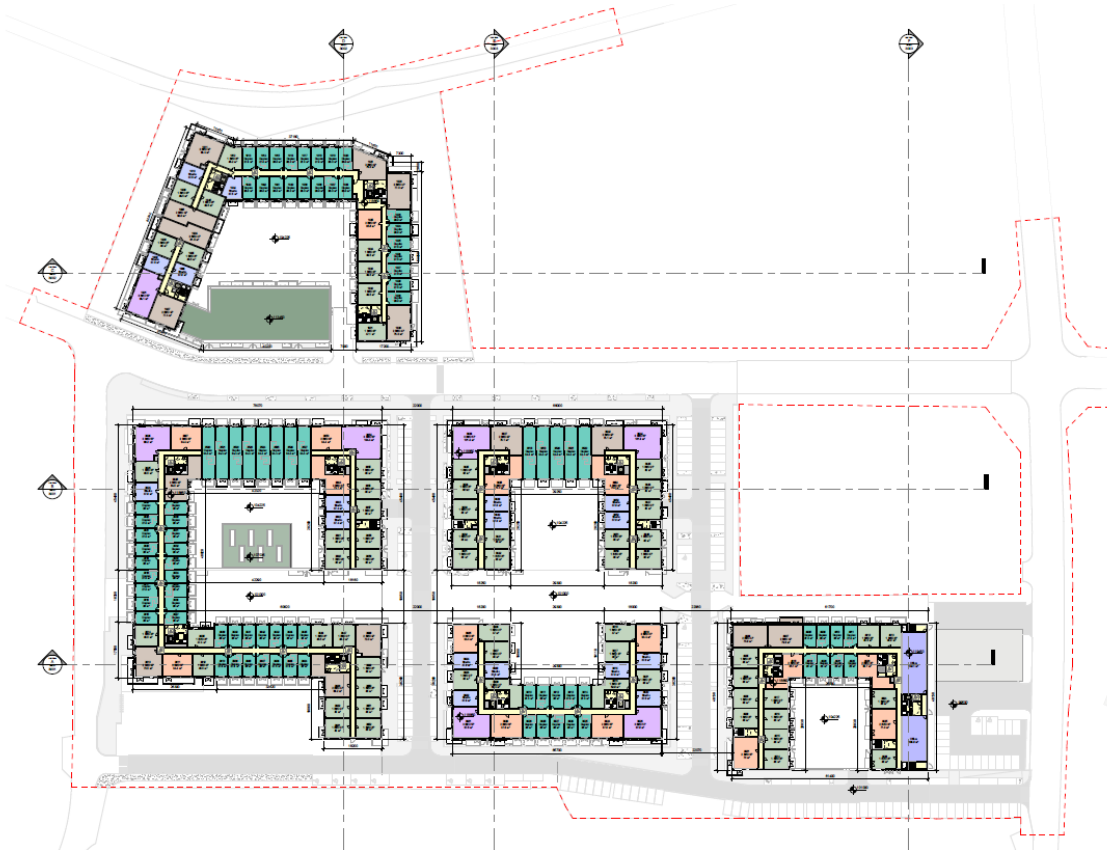


Figure 69.0 Sixth floor plan of the proposed development



Figure 70.0 Seventh floor plan of the proposed development



Figure 71.0 Eighth floor plan of the proposed development



Figure 72.0 Ninth floor plan of the proposed development

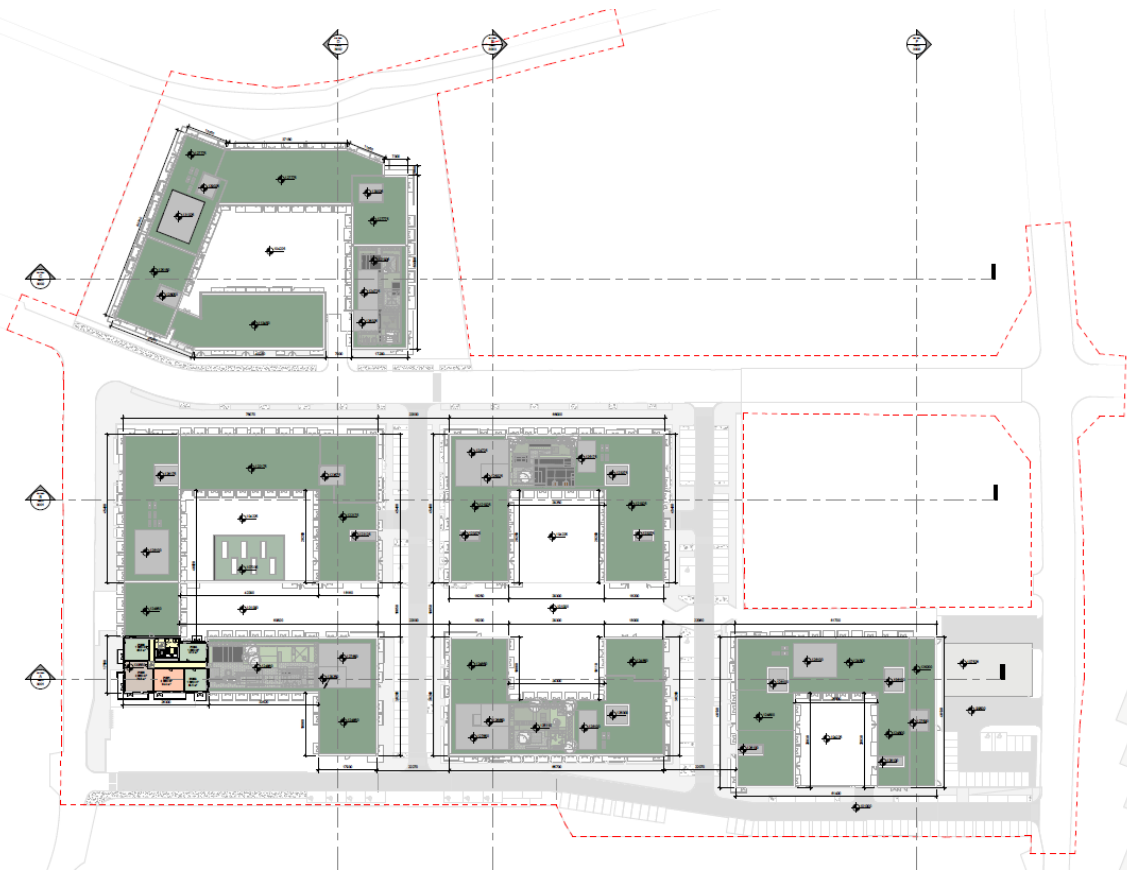


Figure 73.0 Tenth floor plan of the proposed development

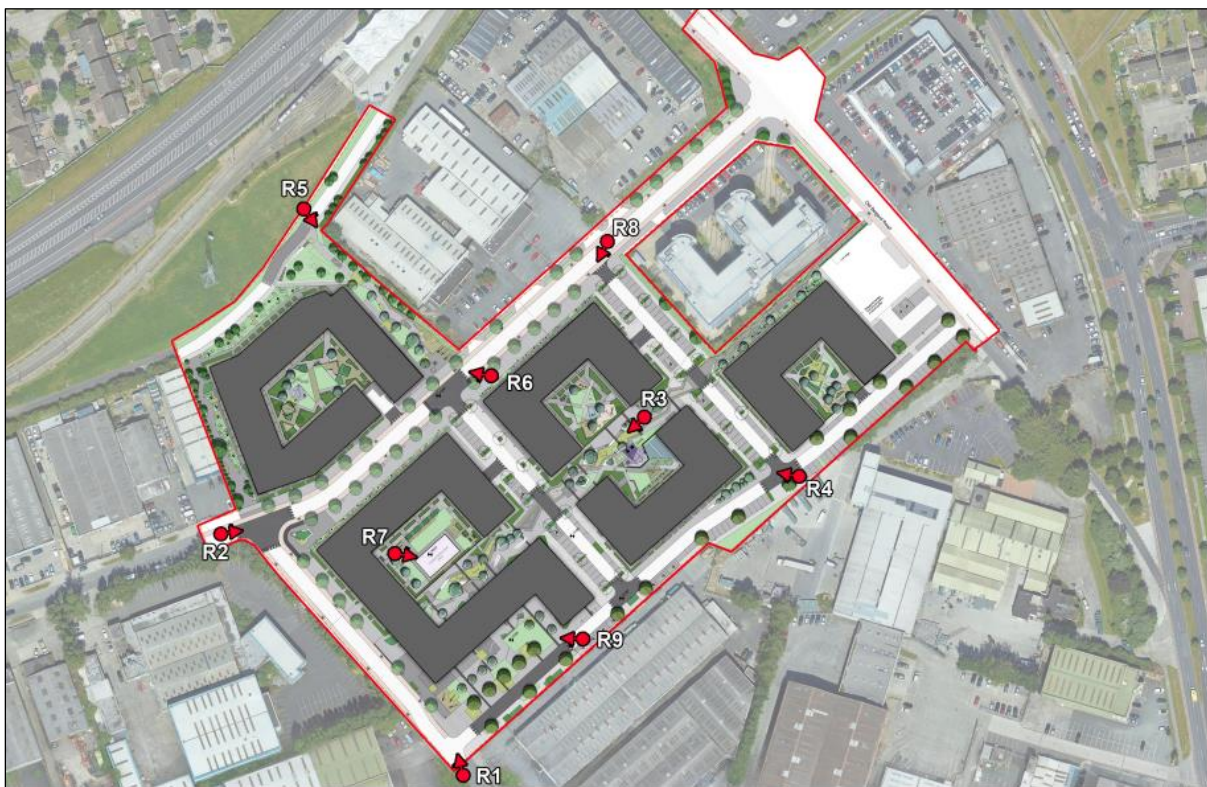


Figure 74.0 CGI position map



Figure 75.0 CGI R9 of the proposed development



Figure 76.0 CGI R6 of the proposed development



Figure 77.0 CGI R3 of the proposed development



Figure 78.0 CGI R5 of the proposed development



Figure 79.0 CGI R1 of the proposed development



Figure 80.0 Ground and first floor landscape masterplan for the proposed development



Figure 81.0 Rooftop garden landscape details for the proposed development

More specifically, the proposed 4 no. blocks can be described as follows:

- Block A** Residential building (4 to 9 storeys, with podium level car park) located in the northern part of the site accommodating 36 no. studios, 79 no. 1-bed apartments, 62 no. 2-bed apartments, 75 no. 2-bed duplex apartments and 8 no. 3-bed apartments, with associated balconies / terraces for each apartment from ground floor to 8th floor levels. Block A features 492sqm of internal communal amenity space at ground and eighth floor levels and 1355sqm of external amenity space in the form of a 1078sqm landscaped courtyard at first floor level and 276sqm roof terrace at eighth floor level. Block A's podium level car park features 68 no. car parking spaces (4 no. of which are limited mobility user spaces) and 540 no. bicycle parking spaces.
- Block B** Mixed-use building (7 to 11 storeys, with podium level car park) located in the south-western corner of the site accommodating 28 no. studios, 152 no. 1-bed apartments, 52 no. 2-bed apartments, 98 no. 2-bed duplex apartments and 12 no. 3-bed apartments, with associated balconies / terraces for each apartment from ground floor to tenth floor levels; and 2 no. commercial units (totaling 285sq.m) both accommodating a cafe/restaurant/bar. Block B features 916sqm of internal communal amenity space at ground and ninth floor levels and 1619sqm of external amenity space in the form of a 872sqm landscaped courtyard at first floor level, which features a 285sqm pavilion, and a 461sqm roof terrace at ninth floor level. Block B's podium level car features 53 no. car parking spaces and 336 no. bicycle parking spaces. Block B has been setback from the sites south-western corner to provide a 1688sqm public plaza.
- Block C** Residential building (7-9 storeys, with podium level car park) located centrally on the site accommodating 68 no. studios, 155 no. 1-bed apartments, 53 no. 2-bed apartments, 49 no. 2-bed duplex apartments and 25 no. 3-bed apartments, with associated balconies / terraces for each apartment from ground floor to eighth floor levels; and a 245sqm creche with 100sqm external play space. Block C features 1002sqm of internal communal amenity space at ground, eighth and ninth floor levels and 1746sqm of external amenity space in the form of a 456sqm landscaped courtyard at ground floor, a 724sqm landscaped courtyard at first floor level, a 288sqm roof

terrace at seventh floor level and a 277sqm roof terrace at eighth floor level. Block C's podium level car park features 42 no. car parking spaces and 336 no. bicycle parking spaces.

Block D Mixed-use building (8 storeys) located in the south-eastern corner of the site fronting Old Belgard Road accommodating 89 no. 1-bed apartments, 41 no. 2-bed apartments and 22 no. 2-bed duplex apartments, with associated balconies / terraces for each apartment from ground floor to seventh floor levels; 2 no. commercial units (totaling 477sq.m), one of which will serve the existing Circle K Belgard petrol station which is to be retained and the other accommodating Class 1, 2 and 8 uses as per the Planning and Development Regulations, 2001-2019, as amended; and 1500sqm of office space across first to seventh floor level. Block B features 152sqm of internal communal amenity space at ground floor level and 609sqm of external amenity space in the form of a landscaped terrace first floor level. Block D's podium level car park features 30 no. car parking spaces and 252 no. bicycle parking spaces. An additional 21 no. car parking spaces are provided in the north-eastern corner of the block to serve the proposed commercial units and office space.

In addition to the external communal amenity spaces discussed above, the proposed development includes 6,680sqm of public open space. This is inclusive of a linear park around Block A, a linear park centrally at Block C which ties in with an interconnected linear park and public plaza featuring in Block B. The 1688sqm public plaza is provided in the south-western corner of the site immediately north of a new urban square proposed in the Tallaght Town Centre Local Area Plan 2020-2026. Block B has been designed to include 2 no. double height entries adjacent to the public open space area – this provides views into the space and a welcoming environment for users outside the proposed development. The public plaza featuring in Block B is overlooked by the roof terrace immediately north. All proposed roof terraces, including the one overlooking the public plaza, have been positioned as such to ensure good solar access and have been designed having regard to potential wind impacts to ensure a suitable environment for users.

The internal communal amenity spaces provided will include reception/concierges; gyms/yoga studios; meeting/events room; TV/games rooms; work hubs; lounge/club/functional rooms; residents lounges; leasing suite; cafe/bar; creche facility; and landscaped courtyards and roof terraces (includes a children's playspace and lounge/club/functional room). The work hubs proposed will allow residents to work from home which is particularly important in light of the current Covid 19 climate.

It is also proposed to construct a new road through the subject site, along the sites southern boundary, which links Cookstown Road with the Old Belgard Road, as well as 2 no. new roads through the subject site linking Cookstown Road with the newly created through road. The proposed road will achieve the through street sought by the Tallaght Town Centre Local Area Plan in this position, in Section 2.2.1. A new pedestrian link is proposed from Cookstown Road to the Belgard Luas Stop immediately north. The proposed development also includes road, junction and streetscape upgrades along First Avenue, Cookstown Road and Old Belgard Road, including the removal of the existing high kerbs and the installation a signalized junction at the intersection of First Avenue and Cookstown Road and the intersection of Old Belgard Road and Cookstown Road. These road, junction and streetscape upgrades have been designed to tie in with the road/street layout outlined in the Tallaght Town Centre Local Area Plan 2020-2026. For further details please refer to the drawings included at Appendix A to the Transportation Assessment Report, prepared by NRB Consulting Engineers, which accompany this application under a separate cover. Excerpt from these drawings are included overleaf as well as photomontages/CGIs, prepared by 3D Design Bureau, which illustrate the existing and proposed roads/junctions featuring at the intersection of First Avenue and Cookstown Road.

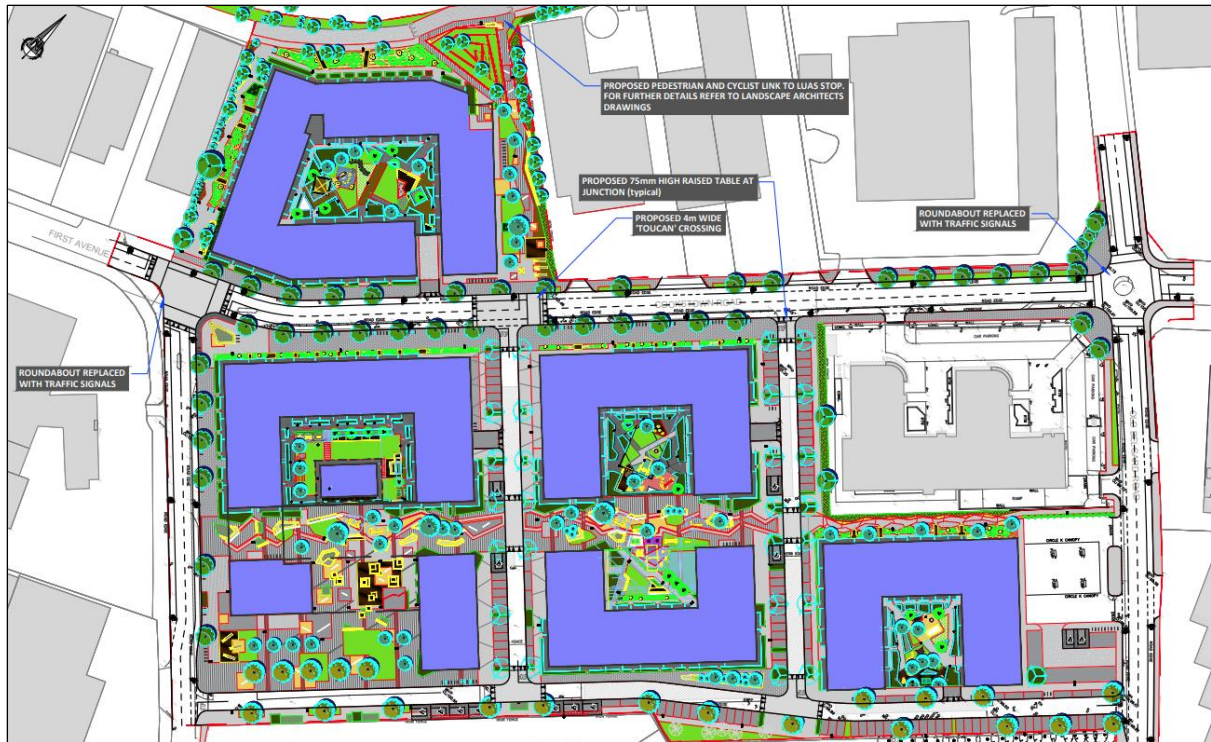


Figure 82.0 Excerpt from Drawing No. NRB-TA-001, prepared by NRB Consulting Engineers, illustrating road, junction and streetscape upgrades along First Avenue, Cookstown Road and Old Belgard Road



Figure 83.0 Image, taken by 3D Design Bureau, of the existing junction/roads at the intersection of First Avenue and Cookstown Road



Figure 84.0 Verified view montage, prepared by 3D Design Bureau, of the proposed junction/roads at the intersection of First Avenue and Cookstown Road

Associated site and infrastructural works are also proposed which include: foul and surface water drainage; attenuation tanks; lighting; landscaping; boundary fences; plant areas; ESB substations; internal hard landscaping, including footpaths and street furniture; and all associated site development works.

Please also refer to the Design Statement and architectural drawing set, prepared by C+W O'Brien Architects, for further details regarding the above. The subject application has been prepared having regard to the feedback received from An Bord Pleanála and South Dublin Council during pre-planning consultations. It is also worth noting that the proposed development has been designed having regard to the approach surfaces relating to Casement Aerodrome. This is illustrated in the Aeronautical Assessment Report, prepared by O'Dwyer & Jones Design Partnership Aviation Planning and Architecture Consultants which accompanies this application.

6.0 Planning Policy Context

This section of the statement will examine the planning framework, including national, regional and local, that informs the use and development of the subject land. Documents of note are as follows:

- Project Ireland 2040 – National Planning Framework (2018);
- National Development Plan 2018-2027;
- Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018;
- Rebuilding Ireland – Action Plan for Housing and Homelessness, July 2016;
- Department of Housing, Planning and Local Government Circular PL 8/2016 APH 2/2016;
- Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007);
- Sustainable Residential Development in Urban Areas – Guidelines for Planning Guidelines (2009);
- Urban Design Manual – A Best Practice Guide 2009;
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018);

- Design Manual for Urban Roads and Streets (2013);
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Regional Spatial & Economic Strategy for the Eastern and Midland Regional Assembly, 2019;
- South Dublin County Development Plan 2016-2022; and
- Tallaght Town Centre Local Area Plan 2020-2026.

6.1 Project Ireland 2040 – National Planning Framework (2018)

The Project Ireland 2040 - National Planning Framework (2018) seeks more balanced and concentrated growth, particularly within the five major cities in Ireland. The following target is outlined in relation to national growth:

We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In our plan we are targeting these five cities for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth.

More specifically, strategies are included in Chapter 2.2 of the Planning Framework which seek to target a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas. This target is to be achieved by making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.

The proposed development is representative of the form of development which is sought as per the provisions of the national planning framework. Moreover, we would note the following national policy objectives as per Project Ireland 2040:

- National Policy Obj. 3a** *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*
- National Policy Obj. 3b** *Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.*
- National Policy Obj. 13** *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.*
- National Policy Obj. 35** *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.*

The proposed development is consistent with the above as it involves the re-development of underutilised land which is in close proximity to existing facilities and public transport.

6.2 National Development Plan 2018—2027

The National Development Plan 2018—2027 sets out the investment priorities that will underpin the successful implementation of the National Planning Framework, including the development of the necessary housing stock set out therein. The National Development Plan demonstrates the Government's commitment to meeting Ireland's infrastructure and investment needs over the next ten years, through a total investment estimated at €116 billion over the period. This includes investment in high quality integrated public and sustainable transport systems as well as health and education.

One of the two investment priorities envisaged by this plan in relation to education, more specifically the higher education sector, is bolstering the capacity of multi-campus Technological Universities and of Institutes of Technology. Technological University Dublin-Tallaght Campus is identified as one of the Institutes of Technology to benefit from future investment.

With regards to health, a Paediatric Outpatients and Urgent Care Centre is due to open at Tallaght Hospital in 2020, while Tallaght Hospital is also identified for Renal Dialysis and Intensive Care Units within the life of the plan.

The proposed development will provide much needed accommodation in close proximity to both of these facilities.

6.3 Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018

These guidelines are intended to set out national planning policy guidelines on building heights in relation to urban areas, as defined by the census, building from the strategic policy framework set out in Project Ireland 2040 and the National Planning Framework.

These guidelines outline that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas. The rationale for consolidation and densification to meet our accommodation needs applies in relation to locations that development plans and local area plans would regard as city and town centre areas as well as areas in and around existing urban areas and suburban areas.

This policy encourages the facilitation of increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development through the planning process, particularly at local authority and An Bord Pleanála levels. Increasing prevailing building heights is deemed to have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development.

In particular, increased density and height of development within the footprint of developing sustainable mobility corridors and networks, where substantial investment in public transport infrastructure has been made as part of Project Ireland 2040. SPPR 1 goes on to outline the following in relation to this:

In accordance with Government policy to support increased building height in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.

The height and density proposed is consistent with the above the subject site's proximity to the Luas and bus network serving the Tallaght/Cookstown area. Further to this, the proposed development scores highly when assessed against the development management criteria set out in the consultation draft guidelines as, aside from being well served by public transport, it:

- Enhances the character, built environment and public realm of the area, featuring well considered high quality materials and appropriately responds to the lower scale residential development in the surrounding area;
- Maximises access to natural daylight, ventilation and views due to the positioning of the blocks; and
- Has limited impact in relation to overshadowing and loss of light due to its separation from existing residential developments in the surrounding area.

Section 3.2 of the Building Height Guidelines states that:

To support proposals at some or all of these scales, specific assessments may be required and these may include:

- *Specific impact assessment of the micro-climatic effects such as downdraft. 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.*
- *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.*
- *An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.*
- *An assessment that the proposal maintains safe air navigation.*
- *An urban design statement including, as appropriate, impact on the historic built environment.*
- *Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.*

The subject application is accompanied by the following reports, consistent with the above requirements:

- An Environmental Impact Assessment Report, inclusive of a micro-climate assessment;
- An Appropriate Assessment Screening Report, prepared by Altemar Ecological Consultants;
- A Sunlight, Daylight and Shadow Assessment Report, prepared by JAK Consulting Engineers; and
- An Aeronautical Assessment Report, prepared by O'Dwyer & Jones Design Partnership.

6.4 Rebuilding Ireland – Action Plan for Housing and Homelessness, July 2016

The 'Action Plan for Housing and Homelessness' was published in July 2016 as part of the Government's Rebuilding Ireland initiative. This is a whole-of-Government plan seeks to double residential construction output to 25,000 homes per year by 2020; deliver 47,000 units of social housing by 2021; make the best use of existing housing stock; and lay the foundations for a stronger, more stable private rented sector. The Action Plan seeks to address existing issues of housing supply and homelessness in Ireland through five 'Pillars'. Pillar 4, 'Improving the Rental Sector', includes build-to-rent and encourages "build-to-rent" as a key action. It is stated that a build-to-rent model can deliver additional supply towards the overall target supply of 25,000 units per annum.

We submit that the proposed development responds to a recognised need, at national level, for build-to-rent accommodation and is consistent with policy in this regard.

6.5 Department of Housing, Planning and Local Government Circular PL 8/2016 APH 2/2016

The Department of Housing, Planning, Community and Local Government (DHPCLG) issued a Circular Letter in 2016, states that the emerging Build to Rent (BTR) sector offers significant new opportunities to increase the scale and pace of delivery of housing. Planning authorities are requested to proactively encourage and work with proposers of BTR projects to facilitate their emergence at appropriate locations. The Department is giving active consideration to issuing further guidance in relation to this important new sector of housing provision in the near term.

The proposed development accords with the policy set out in the Circular Letter from DHPCLG.

6.6 Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007)

The purpose of these Guidelines is to assist in achieving the objectives for Delivering Homes, Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes.

The subject site will be located within 750 metres of the Tallaght Town Centre once the Cookstown Road Extension is completed. The Tallaght Town Centre features several local amenities such as shops, restaurants, entertainment venues etc. Furthermore, the site is also situated immediately adjacent to the Cookstown Luas Stop which provides access to Dublin City Centre which has numerous amenities that can be enjoyed.

In addition, the subject development provides a number of residential amenities on site, including a creche at ground floor level of Block C and communal amenity areas within each of the developments 4 no. blocks.

6.7 Sustainable Residential Development in Urban Areas – Guidelines for Planning Guidelines (2009)

The Sustainable Residential Development in Urban Areas – Guidelines for Planning Guidelines (2009) updated and revised earlier guidance of 1999. These statutory guidelines, which were brought forward to improve the quality of homes and neighbourhoods, set out best practice design criteria and provide a robust framework in which proposals for residential development should be considered. They establish a series of high level aims for successful and sustainable development in urban areas. The proposed development has been designed to address the provisions of these guidelines, as set out hereunder:

- The design of the proposed development responds appropriately to its locational context in terms of its scale, massing and architectural treatment. It will provide an appropriate form of redevelopment along Cookstown Road and Old Belgard Road, in accordance with the principals of South Dublin County Development Plan 2016-2022 and Tallaght Town Centre Local Area Plan 2020-2026 objectives and policies. The proposal provides for the regeneration of a brownfield site in a sustainable manner.
- The location of the proposed development close to public transport routes will ensure good connectivity. Its location immediately south-west of the Belgard Luas stop and the provision of 1860 no. bicycle parking spaces on site will promote walking and cycling to and from the development and minimise the use of cars.
- By its nature, the proposed development will accommodate a diverse mix of residents; workers in the nearby hospital and T.U., workers within the broader area and students attending the nearby hospital and T.U. as well as Colleges and Universities in the broader area. In terms of layout, the provision of communal facilities, including communal amenity spaces, gym and open space areas at ground and first floor levels together will facilitate significant levels of interaction.
- The proposed development, by reason of its location on a brownfield site, together with its density and layout, will promote the efficient use of land and of energy, including in relation to transport, and thereby minimise greenhouse gas emissions.
- The proposed blocks are formed around landscaped courtyards and will include commercial units, a creche, residential amenity spaces and own door access apartments opening onto Cookstown Road, Old Belgard Road and the newly created roads on site which creates a distinct sense of place. Further to this higher built form elements are provided immediately adjacent to the intersection of Cookstown Road and First Avenue and the in the south-western corner of the site adjacent to the proposed public park which will create a distinct sense of place when travelling northwards on Cookstown Road and eastwards on First Avenue.
- The proposed design provides for a high-quality development, including purpose-built build-to-rent accommodation. The amenity spaces provided, both internal and external, as well as the communal spaces and facilities provided, will afford a high standard of residential environment.

Having regard to the foregoing, it is considered that the proposed development would be consistent with the Sustainable Residential Development in Urban Areas Planning Guidelines (2009).

6.8 Urban Design Manual – A Best Practice Guide 2009

The ‘*Urban Design Manual – A Best Practice Guide, 2009*’ is based around twelve questions that have been drawn up to encapsulate a full range of design considerations for residential development such as that proposed on the subject site. These questions are ‘*a distillation of current policy and guidance and tried and tested principles of good urban design.*’

This report reviews the proposed development in this context in an effort to address the key issues of design, scale, massing and integration with the fabric of the area while respecting the amenity of adjacent properties.

(i) Context - How does the development respond to its surroundings?

The proposed building will have a prominent position on the junction of Cookstown Road and First Avenue. The buildings are designed to have active frontages along both Cookstown Road and the proposed new road connecting Cookstown Road and Old Belgard Road, where there will be a high degree of passive surveillance of the public realm from within the building. This part of the Tallaght, the Cookstown Industrial Estate, has been identified for considerable change moving forward. Recent developments in and around the Tallaght Town Centre have brought an intensification of residential densities, increased massing and a growth in the scale of buildings. The Tallaght Town Centre Local Area Plan 2020-2026 seeks similar development within the area to the north of the Town Centre Area, within which the subject site lies. The form and scale of the proposed development has been informed by recent residential buildings within the Tallaght Town Centre area. The proposed developments design is consistent with current increased density, intensification of use and significant increase in heights encouraged by the National Planning Framework.

This new building will exert its own streetscape presence on Cookstown Road, Old Belgard Road and the newly created streets and will generate activity at street level along all frontages due to the proposed commercial units, creche and communal amenity areas as well as the own door apartments and location of terraces and balconies proposed. The proposed residential, commercial and office uses will enliven the neighbourhood and bring additional footfall to the area.

The proposed development includes a public plaza in the south-western corner of the site which will tie in with the public park proposed immediately south of the subject site.

(ii) Connections - How well connected is the new neighbourhood?

The proposed development scheme has been designed to facilitate quality all-round access, including vehicular, pedestrian and cyclist movement. The site has vehicular access to Cookstown Road that links the site to a number of main arterial routes into Dublin City centre and the M50 motorway thereby providing access to a large extent of the Irish road network. The site is situated immediately south-west of the Belgard Luas stop and a number of bus services run along Old Belgard Road, immediately adjacent, offering access to and from the city. The Cycle Network Plan for the Greater Dublin Area – Proposed Cycle network Dublin South Central indicates that cycle paths will be introduced/improved along the site’s northern and eastern boundaries. Furthermore, a series of new streets will provide pedestrian connections to public transport and Tallaght Town Centre.

It is considered that the proposed residential density is appropriate to the site location in transport terms and will help support efficient public transport.

(iii) Inclusivity - How easily can people use and access the development?

Currently, there is limited landscaping and street furniture along this section of Cookstown Road and Old Belgard Road. The development will benefit residents in the neighbourhood by improving the public realm. People will find this section of Cookstown Road and Old Belgard Road more attractive environment to use both during the day and at night-time. Within the proposed development all areas are designed with level access throughout the internal accommodation and external garden areas. A wide range of amenity spaces are proposed, and all common facilities are fully accessible. All floors in the building are served by lift, as well as by stairs. The proposed commercial/retail units, creche,

communal amenity spaces, own-door apartments and double height openings open up the site providing animation to passers-by through its openness at ground floor level.

(iv) Variety - How does the development promote a good mix of activities?

The proposed development features a mixture of residential accommodation alongside a range of office, commercial and communal amenity spaces. The site is well positioned within reach of many sources of employment as well as hospitals and third level institutions. In addition, the proposal includes a creche as well as landscaping and seating areas along the street frontages and within the proposed public open space areas. This will provide external animation on the street frontages.

(v) Efficiency - How does the development make appropriate use of resources, including land?

Both the South Dublin County Development Plan 2016-2022 and the Tallaght Town Centre Local Area Plan 2020-2026 seek to encourage higher densities at this location. Currently on the site are underutilised industrial units. The construction of a new mixed-use development will bring about a significant improvement to the site conditions, bringing the land back into a beneficial use. The redevelopment of this brownfield site for residential accommodation and commercial/office use will significantly improve the physical environment and provide high-density accommodation on an underutilised site.

Open spaces and roofs are designed with Sustainable Urban Drainage Solutions (SUDS). The central courtyards, takes best advantage of the solar orientation. The layout is designed such that all living / dining / kitchen spaces are positioned to front the central courtyard or the outside elevations of the building, thereby offering units which are outward looking, with varied aspects.

The proposed density will make public transport a more viable option at this location and reduce the need for private cars.

(vi) Distinctiveness - How do the proposals create a sense of place?

The proposed development, through contemporary design will create a positive addition to the identity of the locality, which will serve as a high-quality distinct development of moderate scale on a brownfield site which is presently severely underutilised.

The proposed building at this location on the corner of Cookstown Road and First Avenue will have a strong identity and become a distinctive and recognisable place. The proposed building adopts a generous setback from the site's south-western corner to create a plaza as well as landscaping and seating areas along the street and plaza frontages which aid in creating the gateway sought by the Tallaght Town Centre Local Area Plan 2020-2026.

(vii) Layout - How does the proposal create people friendly streets and spaces?

The layout of the proposed building responds to the site context, the position of adjacent buildings and other proposed developments in the vicinity. The development addresses both site frontages with landscaping and own door accesses proposed to both Cookstown Road and the proposed new streets with the development, as well as the public open spaces. Commercial/retail units, a public plaza, a creche and communal amenity spaces are also proposed along these street and courtyard frontages. This will create additional activity, footfall and animation to both of these streets and the communal open space areas.

(viii) Public Realm - How safe, secure and enjoyable are the public areas?

The scheme has been designed with landscaping and street furniture along Cookstown Road and the proposed internal streets. A large central courtyard is provided in each block and is interfaced with a number of units in the apartment building as well as proposed communal roof gardens, communal amenity spaces and commercial spaces serving the development which will provide a safe place which benefits from passive surveillance and can be enjoyed by the prospective residents.

The public realm around the site will be improved with the setting back of the building to create generously proportioned walkways and a public plaza in the south-west corner of the site as well as the

proposed road, junction and streetscape upgrades proposed along First Avenue, Cookstown Road and Old Belgard Road.

(ix) Adaptability - How will the buildings cope with change?

Adaptability of the design has been considered and it is proposed that all internal walls be constructed in a non-masonry system, thereby allowing future modifications to layouts to be readily implemented.

The building will be thermally efficient, and it is proposed to use a centralised adaptable plant.

(x) Privacy and Amenity - How does the scheme provide a decent standard of amenity?

The proposed accommodation and the shared amenity spaces are designed to meet current design standards, as set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018). In many areas, the minimum standards are exceeded such as the space requirements in units.

Many of the proposed apartments enjoy dual aspect and all have their living/kitchen spaces on the outer elevations of the building or fronting the central courtyards. Appropriate acoustic insulation will be designed to prevent sound transmission from one unit to another and from areas of non-residential uses to residential uses. All apartments have access to large semi-private central courtyards in each block which features a mix of hard and soft landscaping and amenity spaces, including a children's playground. Each block is also provided with an additional landscaped communal open space area at upper floor level. These roof terraces are generous in size, have good solar access, provide views of the surrounding area and have been designed so as to reduce potential wind impacts.

The location of the development means that there is no direct overlooking of any other residential properties, with the buildings immediately south, west and east comprising non-residential buildings, and a considerable separation distance existing between the subject site and the housing estates to the north, on the opposite side of Katherine Tynan Road.

(xi) Parking - How will the parking be secure and attractive?

The development is provided with 348 no. on-site car parking spaces which is considered appropriate given the sites proximity to the Luas and numerous bus/cycle routes. In addition to this, the development is served by 1860 no. bicycle parking spaces. The majority of car and bicycle parking spaces are accommodated in secure podium level carparks. The remaining car and bicycle parking spaces are provided on street in locations which are passively surveilled.

(xii) Detailed Design - How well thought through is the building and landscape design?

The proposed buildings range in height from 4 to 11 storeys, gradually increasing to visually connect with the height of proposed future developments in line with the LAP. The highest built form element has been positioned in the south-western corner of the site, adjacent to the proposed public plaza, to create a sense of arrival and draw attention to this space. Generous setbacks from the eastern and western boundaries feature in the context of Block A to create pedestrian and cycle routes through the scheme to the adjacent Belgard Luas Stop. This, in combination with the new roads introduced in the southern part of the site, improves permeability in the surrounding area.

The materials and external design of the proposed development make a positive contribution to the locality. Design of the buildings will facilitate easy and regular maintenance. Care has been taken over the siting of flues, vents, bin storage, etc. Please refer to the Design Statement, prepared by C+W O'Brien Architects, which accompanies this application for further discussion on the building design.

The proposed development features a variety of public and communal open space areas across the scheme, as illustrated in Drawings No. P19127-CWO-00-00-DR-A-0013 and P19127-CWO-00-00-DR-A-0014, prepared by C+W O'Brien Architects. With regards to public open space, the development features a linear park around Block A, a linear park centrally at Block C which ties in with an interconnected linear park and public plaza featuring in Block B. The public plaza is provided in the south-western corner of the site immediately north of a new urban square proposed in the Tallaght

Town Centre Local Area Plan 2020-2026. Block B has been designed to include 2 no. double height entries adjacent to the public open space area – this provides views into the space and a welcoming environment for users outside the proposed development.

Communal open space is provided in the form of central courtyards provided at ground and first floor levels (a minimum of 1 provided per block) and roof terraces at upper floor levels. The communal courtyards serving Blocks B and C have an outlook to the linear parks featuring centrally on the site, with Block B's northernmost communal courtyard featuring a pavilion building providing added usability in the context of this space. The roof top terraces receive good solar access due to their positioning, provide views of the surrounding area and have been designed having regard to potential wind impacts to ensure a suitable environment for users.

The main idea driving the landscape design in these public and communal open space areas is the use and combination of a floating geometry with strong forms and shapes that repeat throughout. These are carefully placed and manipulated to create a clear overall identity and sense of place. Forms, shapes and spaces will flow logically and will be detailed creatively to provide opportunities for movement, activity and rest resulting in a diverse public realm and series of highly legible amenity open spaces. Please refer to the Landscape Design Rationale, prepared by Landscape Design Rationale, which accompanies this application for further discussion on the landscape design.

6.9 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)

The proposed development has been designed to be fully comply with the standards set out in *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities*, published by the Department of the Environment, Community and Local Government in March 2018. The 2018 Guidelines update previous guidance in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness Rebuilding Ireland and Project Ireland 2040 and the National Planning Framework, published since the 2015 guidelines.

Furthermore, the 2018 Guidelines include guidance specific to the emerging 'build to rent' and 'shared accommodation' sectors, which did not feature in the previous 2015 Guidelines. These are set out in Section 5.0 and Specific Planning Policy Requirements 7 and 8 included therein relate specifically to build-to-rent developments.

Specific Planning Policy Requirement 7 reads as follows:

Specific Planning Policy Requirement 7

BTR development must be:

- a) *Described in the public notices associated with a planning application specifically as a 'Build-To-Rent' housing development that unambiguously categorises the project (or part of thereof) as a long-term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such. Such conditions include a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period;*
- b) *Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:*
 - i. *Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.*

- ii. *Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.*

In response to the above requirements, the public notices for this application have identified the development as 'Build-to-Rent' development and a draft legal agreement accompanies the application. The application is also accompanied by a BTR Operational Management Plan, prepared by LIV Consulting, and a Building Lifecycle Report, prepared by AWN Consulting, consistent with the requirements of Section 6.0 of the guidelines. Further to this, the development has been designed to include resident support facilities and resident services and amenities (totalling 2741sqm), including a reception/concierges; gyms/yoga studios; meeting/events room; TV/games rooms; work hubs; lounge/club/functional rooms; residents lounges; leasing suite; cafe/bar; creche facility; and landscaped courtyards and roof terraces (includes a children's playspace and lounge/club/functional room, as well as 5 no. ground and first floor level landscaped courtyards and 4 no. generous roof terraces.

Specific Planning Policy Requirement 8 read as follows:

Specific Planning Policy Requirement 8

For proposals that qualify as specific BTR development in accordance with SPPR 7:

- i. *No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;*
- ii. *Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;*
- iii. *There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures;*
- iv. *The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;*
- v. *The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.*

The proposed developments consistency with the standards applying to 'Build-to-Rent' schemes is discussed below.

Minimum Floor Area

Specific Planning Policy Requirement 3 sets out minimum apartment floor areas. The overall apartment floor area sizes required for apartment units area as follows:

- *Studio apartment* 37sq.m
- *1-bedroom apartment* 45sq.m
- *2-bedroom apartment (3 persons)* 63sq.m
- *2-bedroom apartment (4 persons)* 73sq.m
- *2-bedroom apartment (4 persons)* 73sq.m
- *3-bedroom apartment (5 persons)* 90sq.m

The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10%, set out in Section 3.8 does not apply to build-to-rent schemes, pursuant to Specific Planning Policy Requirement 8(iv).

The proposed development comprises of 1104 no. apartment units, of which 132 no. are studio apartments, 475 no. one bedroom apartments, 102 no. 2 bedroom (3P) apartments, 106 no. 2 bedroom (4P) apartments, 244 no. 2 duplex units and 45 no. 3 bedroom units. The floor areas for each of the different apartment types fully compliant with the various floor area and floor width standards, and in most instances are in excess of the required minimum standards, as outlined in the Housing Quality Assessment table, prepared by C+W O'Brien Architects, which accompanies this application.

Minimum Aggregate Floor Areas and Minimum Widths for Living/Dining/Kitchen

The 2018 Guidelines require the following minimum aggregate floor areas in relation to living/Dining/Kitchen Areas:

- *Studio* 30sq.m, minimum width 4m
- *One Bedroom* 23sq.m, minimum width 3.3m
- *Two Bedroom (3P)* 28sq.m, minimum width 3.6m
- *Two Bedroom (4P)* 30sq.m, minimum width 3.6m
- *Three Bedroom (5P)* 34sq.m, minimum width 3.8m

The proposed development is compliant with the minimum aggregate floor areas and minimum widths for living/dining/kitchen area, as illustrated in the Housing Quality Assessment table, prepared by C+W O'Brien Architect, which accompanies this application.

Minimum Floor Areas, Minimum Widths and Minimum Aggregate Floor Areas for Bedrooms

The 2018 Guidelines require the following minimum aggregate floor areas, minimum widths and minimum aggregate floor areas in relation to bedrooms:

- *Studio* 30sq.m, minimum width 4m
- *Single Bedroom* 7.1sq.m, minimum width 2.1m
- *Double Bedroom* 11.4sq.m, minimum width 2.8m
- *Twin Bedroom* 13sq.m, minimum width 2.8m

The overall aggregate bedroom floor areas for apartment unit areas is required as follows:

- *One bedroom - 11.4 sq m*
- *Two bedrooms (3 person) - 13 + 7.1 sq m = 20.1 sq m*
- *Two bedrooms (4 person) - 11.4 + 13 sq m = 24.4 sq m*
- *Three bedrooms - 11.4 + 13 + 7.1 sq m = 31.5 sq m*
-

The proposed development is fully compliant with the minimum aggregate floor areas, minimum widths and minimum aggregate floor areas for bedrooms, as illustrated in the Housing Quality Assessment table, prepared by C+W O'Brien Architect, which accompanies this application.

Dual Aspect Ratios

Specific Planning Policy Requirement 4 provides guidance with regard to dual aspect apartments. The minimum number of dual aspect apartments are as follows:

- (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.*

The proposed development provides 552 no. dual aspect apartments, accounting for 50% of the 1104 no. apartment units proposed, which complies with the above requirements. In addition, the proposed single aspect apartment units have been orientated to face in a southern, eastern or western direction or towards the large central courtyard to allow for maximum light exposure for each individual apartment throughout long periods of the daylight hours. The proposed development is devoid of single aspect north facing apartments. This is consistent with the 2018 Guidelines which recommend, in Section 3.18, that single aspect apartments be orientated to face south, east or west, to allow for maximum sunlight exposure.

Internal Storage

The minimum internal storage areas required for apartment units outlined in the 2018 Guidelines are as follows:

- *Studio* 3sqm
- *One bedroom* 3sqm
- *Two bedrooms (3 person)* 5sqm
- *Two bedrooms (4 person)* 6sqm
- *Three or more bedrooms* 9sqm

Overall, the development provides ample storage for each individual apartment that meets the required storage space needs for each unit, as illustrated in the Housing Quality Assessment table, prepared by C+W O'Brien Architect, which accompanies this application.

Minimum private open space requirements

The Guidelines provides minimum private open space requirements in new apartments. They are as follows:

- *Studio* 4sqm
- *One Bedroom* 5sqm
- *Two Bedrooms (3P)* 6sqm
- *Two Bedrooms (4P)* 7sqm
- *Three or more Bedrooms* 9sqm
-

Overall, the development provides ample private open space for each individual apartment and complies with the above, as illustrated in the Housing Quality Assessment table, prepared by C+W O'Brien Architect, which accompanies this application. Furthermore, all units are provided with access to multiple communal open space areas provided at ground, first and upper floor level.

Minimum communal amenity space requirements

The Guidelines provides minimum communal amenity space requirements in new apartments. They are as follows:

- *Studio* 4sqm
- *One Bedroom* 5sqm
- *Two Bedrooms (3P)* 6sqm
- *Two Bedrooms (4P)* 7sqm
- *Three or more Bedrooms* 9sqm

The communal amenity space requirements for the proposed development is as follows:

Communal Amenity Space Requirements			
Unit Type	Required floor areas for communal amenity space	No. of Apartments	Communal amenity space required
Studio	4sqm	132	582
One Bedroom	5sqm	475	2,375
Two Bedroom (3P)	6sqm	102	612
Two Bedroom (4P)/Duplex	7sqm	350	2,436
Three Bedroom	9 sqm	45	405
Total communal amenity space required			6,410

Table 1.0 Table showing the provided floor areas for private open spaces per apartment type

The guidelines also outline the following in relation to communal amenity space:

Communal amenity space may be provided as a garden within the courtyard of a perimeter block or adjoining a linear apartment block. Designers must ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight to reach communal amenity space throughout the year.

Based on the above requirements, the subject scheme requires 6,410sqm of communal amenity space. The development includes 5,107sqm of communal amenity space in the form of landscaped courtyards (totalling 3807sqm) and roof terraces (totalling 1300sqm). More specifically:

- Block A features a 1078sqm landscaped courtyard at first floor level and 276sqm roof terrace at eighth floor level;
- Block B features a 872sqm landscaped courtyard at first floor level, which features a 285sqm pavilion, and a 461sqm roof terrace at ninth floor level;
- Block C features a 456sqm landscaped courtyard at ground floor, a 724sqm landscaped courtyard at first floor level, a 288sqm roof terrace at seventh floor level and a 277sqm roof terrace at eighth floor level; and
- Block D features a 609sqm landscaped courtyard at first floor level.

The proposed variation to the communal amenity space requirements is considered appropriate in this instance as the proposed development provides 6,680 sq.m of public open space, inclusive of a 1,688sqm public plaza located in the south-western corner of the site, and is located immediately north of a public park proposed under the Tallaght Town Centre Local Area Plan 2020-2026.

The proposed development has been designed to ensure the open space areas serving each block receive adequate levels of sunlight to reach communal amenity space throughout the year, as illustrated in the Sunlight, Daylight and Shadow Assessment Report, prepared by JAK Consulting Engineers, which accompanies this application. In addition to having good solar access, the roof terraces provide views of the surrounding area (the roof terrace serving Block B will provide views out over the public plaza and onto the new urban square proposed immediately south of the block, and have been designed having regard to potential wind impacts to ensure a suitable environment for users as discussed in the Wind and Microclimate Chapter included in the Environmental Impact Assessment Report which accompanies this application.

Floor to Ceiling Height

The Guidelines require minimum floor to ceiling heights of 2.4m for apartments above ground floor, and 2.7m at ground floor to allow flexibility for future use. With floor to ceiling heights of 2.4m-2.7m for all apartments within the scheme, the proposal complies with the Guidelines in both respects.

Security Considerations

Section 3.40 of the Guidelines recommend that in order to ensure visitor and occupant safety natural surveillance should be maximised for all streets, open spaces, play areas and any surface bicycle or car parking areas. Particular attention should be given to entrance points being well lit and overlooked in building blocks. Consideration should also be given to incorporating privacy strips in instances where ground floor apartments front onto public footpaths.

The proposed development has been designed in a manner that allows for maximum natural surveillance throughout the development site, with windows overlooking all internal and external public spaces, whilst also providing terraces to apartments at ground floor level that front onto public footpaths, and is therefore consistent with the Guidelines in this regard.

Bicycle Parking

The Guidelines seek that the design of apartment schemes should ensure that bicycle parking spaces are located to be conveniently accessible to residents, both in terms of proximity to access points to apartments and routes to the external road / street network. The following requirements are also specified in relation to quantity:

Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc.

Based on the above requirements, the subject scheme requires 1,151 no. resident bicycle parking spaces and 551 no. visitor bicycle parking spaces (a total of 1,702 no.). The development includes a provision of 1,464 no. resident bicycle spaces in a secure and convenient location for each apartment and 396 no. visitor bicycle spaces located at ground floor level (a total of 1,860 no.).

It is considered that the proposed development complies with all the required standards set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018).

6.10 Design Manual for Urban Roads and Streets (2019)

The proposed development has been designed having appropriate regard to the Design Manual for Urban Roads and Streets (2013). An assessment against the Design Manual for Urban Roads and Streets (2013) is included in the Transportation Assessment Report, prepared by NRB Consulting Engineers. This is provided under a separate cover.

6.11 The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)

The proposed development has been designed having appropriate regard to the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). An assessment against these Guidelines features in the Engineering Services Report, prepared by GDCL Consulting Engineers. This is provided under a separate cover.

6.12 Guidelines for Planning Authorities on Childcare Facilities (2001)

The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the pre-planning discussions.

The following definition of Childcare is included in the Guidelines:

In these Guidelines, "childcare" is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education and socialisation opportunities for children. Thus, services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.

The South Dublin County Council Development Plan 2016-2022, in Sections 3.10, includes the following policy and guidance in relation to childcare facilities:

Policy C8 (b) *It is the policy of the Council to require the provision of new childcare facilities in tandem with the delivery of new communities.*

C8 Objective 2: *To require childcare infrastructure to be provided in new communities on a phased basis in tandem with the delivery of residential development, in accordance with the phasing requirements of Local Area Plans or approved Planning Schemes.*

The Tallaght Town Centre Local Area Plan 2020-2026, in Section 5.3.2, includes the following policy in relation to childcare facilities:

It is policy of the plan to facilitate the sustainable development of good quality and accessible early childhood care (early years and general childcare both home based and centre based) and education infrastructure (Objective CF 4).

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018) also includes the following guidance in relation to childcare facility provision:

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. 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 total number of units within the proposed development is 1104 no. units. Excluding the studio and 1 bed units (608 no.), there are a total of 496 no. units considered appropriate for families. Based on the above requirement, a crèche capable of accommodating 132 no. children is required to serve the subject development.

As set out on the architectural drawings accompanying this application, the proposed childcare facility is c. 245sqm, with adjacent 100sqm play area. This is considered appropriate for the subject site. The exact capacity of the proposed childcare facility will only become apparent when an operator comes on board and will be subject to operator's particular requirements and will be dependent on what types of childcare facility are already available in the area. However, it is estimated that this childcare facility could cater for the in the order of 61-81 children having regard to an accepted industry average of c. 3 to 4 sq.m gross floor space per child depending on the type of childcare offered by the end user. This falls short of the minimum place requirements set out in the abovementioned guidelines. A variation is considered appropriate in this instance given the nature of the proposed development, being Build-to-Rent. Build-to-Rent developments are generally occupied by young professionals and students and therefore, tend to generate a much lower demand for childcare facilities and play equipment than traditional housing or apartment schemes. Given the subject site proximity to a Tallaght Hospital, it is anticipated that this scheme will also accommodate health care staff. Further to this, a commercial unit

features at the ground floor of Block D which is capable of accommodating a childcare facility should sufficient demand be generate.

It is envisaged that parents will drop-off children on their way to work within the area or on-route to the bus stop/LUAS stop.

6.13 Regional Spatial and Economic Strategy for the Eastern and Midland Region, 2019

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (DRSES) was published in June 2019. A Regional Spatial & Economic Strategy (RSES) is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level, it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Regions.

The DSES states that there is further capacity for regeneration of major brownfield lands in Tallaght. It places Tallaght within the South-West Strategic Corridor (Kildare line-Luas red line) which has a population capacity in the short to medium term of 66,000. A key aim is to unlock the development capacity of strategic development areas within the Dublin metropolitan area. The following Regional Policy Objective supports the proposed development:

'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.'

The proposed development is consistent with the above as it will provide housing to accommodate the population increase expected in South-West Strategic Corridor, and Tallaght more specifically, moving forward.

6.14 South Dublin County Development Plan 2016-2022

6.14.1 Core Strategy

Set out in Chapter 1 of the South Dublin County Development Plan 2016-2022 is the 'Core Strategy', which outlines the medium to long term strategy for the spatial development for the county by way of policies and objectives, translating the strategic planning framework set out at national and regional levels.

The following policies and objectives set out in the 'Core Strategy are relevant to the application site:

Policy CS1: *It is policy of the Council to promote the consolidation and sustainable intensification of development to the east of the M50 and south of the River Dodder.*

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).

Policy CS2: *It is the policy of the Council to support the sustainable long term growth of Metropolitan Consolidation Towns through consolidation and urban expansion.*

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).

CS2 Objective 6: To promote higher residential densities at appropriate locations, adjacent to town centres or high capacity public transport nodes (Luas/Rail).

The objective of the 'Core Strategy' is to focus residential-led development to areas with capacity to absorb more intensified forms of development that support the long term growth of the Metropolitan Consolidation Towns. The 'Core Strategy' makes particular reference to higher residential densities being supported at appropriate locations in close proximity to town centres or high capacity public transport nodes, noting underutilised industrial lands, or 'REGEN' zoned lands, adjacent to LUAS and Rail services as priority sites.

The proposed development will provide for the intensification of otherwise underutilised industrial sites that are zoned for residential-led regeneration and is well served by high capacity public transport services, in terms of the Belgard LUAS stop, which is immediately north-east of the northern boundary of the site, and is less than 750 metres north-west of the town centre of the Metropolitan Consolidation Town of Tallaght. It is submitted that the proposed development is therefore in accordance with the objectives of the 'Core Strategy' as set out in the South Dublin County Development Plan 2016-2022.

6.14.2 Zoning

Under the South Dublin County Development Plan 2016-2022, the subject site is zoned 'REGEN', the objective of which is 'to facilitate enterprise and/or residential-led regeneration' (refer to map excerpts below). Land uses permitted in principle in this zoning consist of the following:

'Advertisements and Advertising Structures, Childcare Facilities, Community Centre, Education, Enterprise Centre, Health Centre, Home Based Economic Activities, Hotel/Hostel, Housing for Older People, Industry-Light, Live-Work Units, Motor Sales Outlet, Office-Based Industry, Office less than 100 sq.m, Offices 100 sq.m – 1,000 sq.m, Offices over 1,000 sq.m, Open Space, Petrol Station, Public Services, Recreational Facility, Residential, Restaurant/Café, Residential Institution, Science and Technology Based Enterprise, Shop-Local, Sports Club/Facility, Stadium, Traveller Accommodation.'

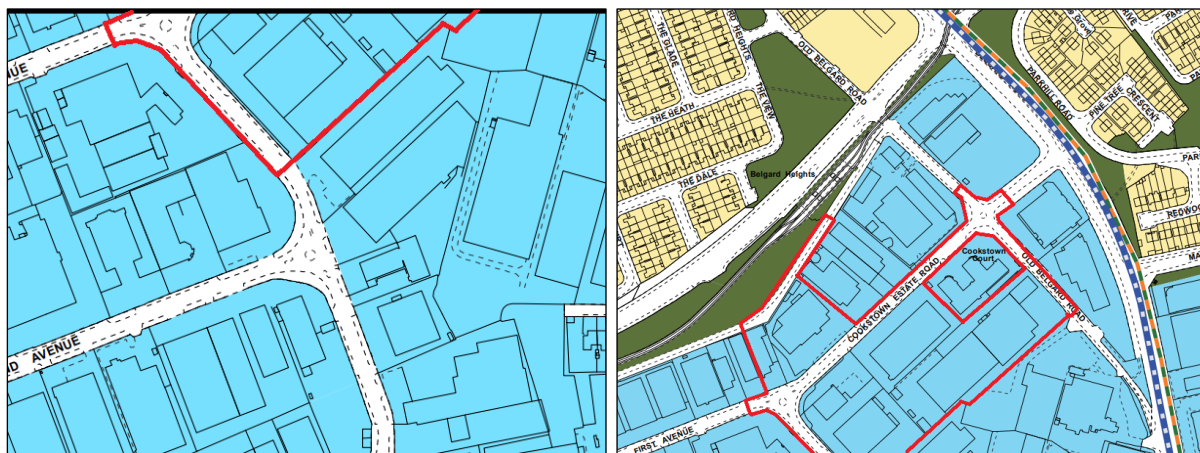


Figure 85.0 Extracts from South Dublin County Development Plan 2016-2022 zoning Map Nos. 5 and 9 showing the application site (in red) within lands with Zoning Objective 'REGEN'

The 'REGEN' zone is a new addition to the land-use zoning classifications, in the South Dublin County Development Plan 2016-2022, and is aimed at supporting and facilitating the regeneration of underutilised industrial lands that are within close proximity to town centres and/or public transport nodes, with a particular emphasis on more intensive enterprise and residential led development. The 'REGEN' zone is a relatively broad zoning designation under which a wide range of uses may be permitted.

Section 4.3.2 'Employment and residential in Regeneration Zones' set out in the South Dublin County Development Plan 2016-2022 outlines how the Council recognises that there are a high level of vacant lands of poor environmental quality throughout the county, and will seeks to support and facilitate a more intensive mix of enterprise and/or residential led development in 'REGEN' zoned lands, in particular in instances where the regeneration relates to underutilised industrial lands that are in close proximity to town centres and public transport nodes.

Policy ET2: *It is the policy of the Council to facilitate and support the regeneration of underutilised industrial areas that are proximate to urban centres and transport nodes and to promote and support more intensive compatible employment and/or residential led development in regeneration zones.*

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.

The development proposed for the application site is a mixed use development, featuring a mix of commercial/retail units, offices and 'build-to-rent' apartments, on an otherwise underutilised industrial/commercial sites that is well served by high frequency public transport services, which include the Belgard Luas stop immediately north-east and a Dublin Bus service, located c. 240 metres east of the subject site offering direct links to Tallaght Town Centre, Dublin City Centre and the wider Dublin area. The application site is also within close proximity Tallaght Town Centre (less than 1 kilometres north), where there is a variety of recreation, education, commercial, employment and retail facilities.

6.14.3 Housing

As set out in Chapter 2 of the South Dublin County Development Plan 2016-2022, a core objective is to provide new housing of good quality, with a focus on the creation of sustainable new communities at locations that can be well served by high quality public transport, with a particular focus on the intensification of infill and brownfield lands with links to existing transport services. It is noted in this section of the development plan that South Dublin County Council will require 32,132 no. additional housing units over the period from 2015 to 2022, and the 'Interim Housing Strategy' forecasts that 8,303 no. social housing units will be required during this period as well, with approximately 2,000 housing units being delivered through Part V of the Planning and Development Act 2000 (as amended).

The following development plan policies are relevant to the proposal on the subject site:

Policy H2: *It is the policy of the Council to seek to ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.*

Policy H6: *It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.*

Policy H7: *It is the policy of the Council to ensure that all new residential development within the County is of high quality design and complies with Government guidance on the design of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended).*

Policy H8: *It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context.*

Policy H9: *It is the policy of the Council to support varied building heights across residential and mixed use areas in South Dublin County.*

Policy H11: *It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.*

Policy H13: *It is the policy of the Council to ensure that all dwellings have access to high quality private open space (inc. semi-private open space for duplex and apartment units) and*

that private open space is carefully integrated into the design of new residential developments.

Policy H14: *It is the policy of the Council to ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long term needs of a variety of household types and sizes.*

Policy H15: *It is the policy of the Council to promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.*

The objective for housing in the South Dublin County Council administrative area is provide high quality residential development that contributes to the communities. In this regard housing in 'REGEN' zoned lands at higher density will be supported where it respects the residential development established in the surrounding area and comply with the Government guidance in terms of design and sustainability, adaptability and where adequate private amenity open space and public open space is provided with passive surveillance. Higher buildings will also be supported in such areas, however, varied heights is preferable.

The proposal for the site is to construct a mixed-use development scheme comprising predominantly of residential units in blocks of varying building heights. The proposed buildings provide a layout that allows an adequate provision of surveillance over public spaces within and surrounding the application site. Furthermore, the proposed apartment units have been designed to comply with the varying quantitative standards for built-to-rent schemes set out in the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)*. See section 6.9 for further details regarding the applicable standards.

The proposed development provides a housing choice in a suitably located area, offering a mix of build to rent apartments on an otherwise underutilised industrial site and is therefore consistent with the housing objectives set out in the development plan.

6.14.4 Building Height

It is stated in Section 5.1.5 of the South Dublin County Development Plan 2016-2022 that varied building heights are supported for proposed developments within urban centres and regeneration zones, and are recognised as playing a key role in creating a sense of place, urban legibility and visual diversity. It is noted in this section of the development plan that proposals for building in excess of five-storeys in height will only be considered at strategic and landmark locations in Town Centres, Regeneration and Strategic Development Zones in accordance with Local Area Plans or SDZ Planning Schemes.

Policy UC6: *It is policy of the Council to support varied building heights across town, district, village and local centres and regeneration areas in South Dublin County.*

UC6 Objective 1: To encourage varied building heights in town, district, village, local and regeneration areas to support compact urban form, sense of place, urban legibility and visual diversity while maintaining a general restriction on the development of tall buildings adjacent to two-storey housing.

UC6 Objective 2: To ensure that higher buildings in established areas take account of and respect the surrounding context.

UC6 Objective 3: To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centre, Regeneration and Strategic Development Zones, and subject to an approved Local Area Plan or Planning Scheme.

The subject site is situated within 'REGEN' – Regeneration area, which under the current development plan is designated for building heights up to five-storeys and allows for up to seven-storeys at landmark locations.

The proposed development adopts landmark components consistent with the above direction. Although the proposed development exceeds the recommended building height included in the South Dublin

County Development Plan 2016-2022, we consider the proposed building height to be appropriate having regard to recent national planning policy direction, including the recently issued Urban Development and Building Heights - Guidelines for Planning Authorities, 2018 (this particular policy is discussed further in Sections 6.3 of this statement), the absence of sensitive receptors on the immediately abutting lots and due to the fact that the subject site is a large site (4.98Ha) capable of establishing its own built form character and a balance of height across the parcel. We also note that the subject proposal results in significant public gain which warrants increased building heights on the site. The concept of public gain is discussed further in Section 6.15 of this statement.

6.14.5 Landscaping / Public Open Space / Children's Play

Section 11.3.1 of the South Dublin County Development Plan 2016-2022 requires that a detailed landscape plan be provided that outlines the extent of open space and treatments within residential and mixed-use developments of 10 units and above. In this regard we would note that a Landscape Masterplan has been prepared by Cunnane Stratton Reynolds Land Planning and Design, to accompany this planning application. The Masterplan provides comprehensive detailing of the proposed landscaping and treatment for the proposed development site.

In addition, the development plan requires that 10% of the total site area for residential developments in 'REGEN' zoned lands are to be allocated to public open space, and in the case of residential developments exceeding 50 units provisions for children's play areas will be required. The application site extends to an area of 49,900sq.m and therefore the minimum open space required on the site is 4,990sq.m. 6,680 sq.m (13% of the site) of public open space is provided which substantially exceeds the minimum requirements. This public open space, as illustrated in Drawing No. P19127-CWO-00-00-DR-A-0013 prepared by C+W O'Brien Architects, comprises of a linear park around Block A, a linear park centrally at Block C which ties in with an interconnected linear park and public plaza featuring in Block B. The public plaza is provided in the south-western corner of the site immediately north of a new urban square proposed in the Tallaght Town Centre Local Area Plan 2020-2026. Block B has been designed to include 2 no. double height entries adjacent to the public open space area – this provides views into the space and a welcoming environment for users outside the proposed development.

Please refer to the Landscape Master Plan and Landscape Strategy and Design Report, prepared by Cunnane Stratton Reynolds, for comprehensive detailing in regards to the open space provisions, landscaping treatment and furniture, and details regarding the proposed playspaces.

6.14.6 Car Parking and Traffic

Car Parking

The South Dublin County Development Plan 2016-2022 requires any new development provide a maximum of car parking spaces depending on the location of the development. The maximum parking rates for residential development are divided into 2 no. categories, which are as follows:

- **Zone 1:** *General rate applicable throughout the County.*
- **Zone 2 (Non Residential):** *More restrictive rates for application within town and village centres, within 800 metres of a Train or Luas station and within 400 metres of a high quality bus service (including proposed services that have proceeded to construction).*
- **Zone 2 (Residential):** *More restrictive rates for application within town and village centres, within 400 metres of a high quality public transport service 5 (includes a train station, Luas station or bus stop with a high quality service).*

The maximum parking rates associated with new residential developments, as set out in Table 11.24 of the South Dublin County Development Plan 2016-2022 are as follows:

- *1 no. space per 1 bed apartment in Zone 1 and 0.75 spaces in Zone 2;*
- *1.25 spaces per 2 bed apartment in Zone 1 and 1 space in Zone 2; and*
- *1.5 spaces per 3 bed apartment in Zone 1 and 1.25 spaces in Zone 2.*

The proposed development, on the basis of its proximity to the Belgard Luas stop is situated in Zone 2, is therefore required to provide 0.75 spaces per studio and 1 bed apartment and 1 space per 2 bed apartments. The following table provides a breakdown of parking spaces required for the proposed development scheme.

	No. of Studio Apartments	No. of 1 Bed Apartments	No. of 2 Bed Apartments	No. of 3 Bed Apartments	Total No. of Spaces Required
Proposed Development	132	475	452	45	963

Table 2.0 Table showing the breakdown of car parking spaces required to serve the proposed development scheme

It is noted in Section 11.4.2 'Car Parking Standards' that the number of spaces set out above are not be exceeded, and in some instances a lower rate of parking may acceptable subject to the following:

- *The proximity of the site to public transport and the quality of the transport service it provides. (This should be clearly outlined in a Design Statement submitted with a planning application),*
- *The proximity of the development to services that fulfil occasional and day to day needs*
- *The existence of a robust and achievable Workforce Management or Mobility Management Plan for the development,*
- *The ability of people to fulfil multiple needs in a single journey,*
- *The levels of car dependency generated by particular uses within the development,*
- *The ability of residents to live in close proximity to the workplace,*
- *Peak hours of demand and the ability to share spaces between different uses,*
- *Uses for which parking rates can be accumulated, and*
- *The ability of the surrounding road network to cater for an increase in traffic.*

Furthermore, the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018) outline that the quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria. The following guidance is provided in regards to 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.

More specifically, the following guidance is set out regarding car parking for build-to-rent developments in Specific Planning Policy Requirement 8:

For proposals that qualify as specific BTR development in accordance with SPPR 7:

-
- (iii) *There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures;*

The proposed development includes, at ground floor level, a total of 348 no. car parking spaces (14 no. of which are designated limited mobility car parking spaces and 16 no. Go-Car spaces) which falls short of the maximum parking rates set out in the South Dublin County Development Plan 2016-2022.

The proposed car parking provision is considered appropriate having regard to the fact that it includes build-to-rent apartments and the subject sites proximity to the Belgard Luas stop, located immediately north-east of the subject site. Furthermore, Bus Routes No. 76 and 76a run along Belgard Road and the subject development features 1,464 no. resident bicycle spaces and 396 no. visitor bicycle spaces located at ground floor level. In addition to sustainable transport options, the proposed development will feature 16 no. Go-Car spaces in the ground floor level car park, providing residents with access to cars.

Further to the above, the proposed car parking rate of 0.32 spaces per dwelling is consistent with the car parking rate featuring in the development approved at: - Units 5A-C Second Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24, under ABP Ref. ABP-303803-19 (0.34 spaces per apartment); Belgard House, Belgard Square and the former Uniphar Factory, The junction of Belgard Road and Belgard Square North, Tallaght, Dublin 24, under ABP Ref. ABP-303306-18 (0.24 spaces per apartment); and Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate, Dublin 24, under ABP Ref. ABP-308398-20 (0.3 spaces per apartment). The following commentary was included in the Inspectors Report, pertaining to the former Uniphar Factory Site under ABP Ref. ABP-303306-18, in this regard:

10.5.11. I would suggest to the Board that the subject site comprises an appropriate location where such car parking provision would be appropriate with the provision in the proposed scheme substantially reduced comprising 0.24 spaces per unit. I consider that if a substantially reduced provision of parking is not appropriate on a site like this then it is unclear where it would be appropriate.

The following commentary regarding car parking provision in the Cookstown Industrial Estate was also included in the Inspectors Report on ABP Ref. ABP-305763-19 pertaining to Site at the corner of Belgard Road and Airton Road, Tallaght, Dublin 24:

12.6.3. Section 4.19 of the Apartment Guidelines (2018) state, in respect of central and/or accessible urban locations, that 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. Given the location of the site in close proximity to high frequency transport route, I consider the provision of car parking to be excessive. I note that the provision in the Belgard Gardens Scheme (ABP Ref 303306-18) was 0.24 spaces per unit. The reduction in parking would also have positive impact on the operation of the adjoining road network, with reduced traffic volumes generated. I consider then, given the locational similarities between the two sites, a similar provision of 0.24 spaces per unit would be appropriate (a total of 89 car parking spaces allocated to the residential units, 14 no. car clubs spaces, 10 accessible car parking space and 4 no. crèche parking spaces) and a condition should be imposed in relation to same.

The following commentary regarding car parking provision in the Cookstown Industrial Estate was also included in the Inspectors Report on ABP Ref. ABP-308398-20 pertaining to Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate, Dublin 24:

10.10.3Having regard to the highly accessible location of the subject site and the provision of 10 no. car club spaces, I am satisfied that the provision of 0.3 spaces per unit is acceptable in this instance and complies with the standards set out in the Design Standards for New Apartments Guidelines. It is also noted that the planning authority raised no objection to the proposed level of car parking.

6.15 Tallaght Town Centre Local Area Plan 2020-2026

The subject site is located within the Tallaght Town Centre Local Area Plan 2020-2026 area. This Local Area Plan (LAP) was adopted on 8th June 2020 and came into effect on 20th July 2020. The purpose of

the LAP is to facilitate the future development of Tallaght Town centre, with the aim of creating a vibrant sustainable town.

6.15.1 Land Use Mix

Section 2.4.1 of the plan sets out the land use strategy for Tallaght Town Centre and the surrounding areas. The strategy has been informed by the planning and sustainable development criteria for area, such as proximity to existing and future public transport. The objective of the strategy is to locate future development to lands that are in close proximity of public transport services. As shown in the extract from the Urban Function map (included in Appendix 5 of the LAP) overleaf, the application site is located in the 'Cookstown' area (more specifically parcel CT-D) which has a land use zoning designation of 'Mixed Use A (High Mix Use)' and Mixed Use B (Residential and Mixed Use)'.

Section 3.3 includes the following guidance in relation to the land use mix/urban function desired within the Cookstown Neighbourhood:

A residential-led area, with a greater mix of use around Luas stops. A focus on more intensive enterprise, employment and innovation uses associated with existing uses such as the Hospital and TUDTallaght. Community, social and other walk to services to provide for a growing residential population.

The LAP also identifies mixed-use frontage in Section 2.4.2. As shown in the extract from the Mixed Use Frontage map (included in Figure 2.5 of the LAP) overleaf, in the context of the subject scheme, Cookstown Road is identified as a mixed use frontage. As a minimum, the mixed-use frontages identified in the Urban Function concept are required to have a mixed-use element and have a non-residential frontage at ground floor level, or some other acceptable alternative which performs the same function of providing activity at ground floor level. Appropriate uses at ground floor level on mixed use frontages can include offices, commercial, services, community facilities, recreational facilities, etc.

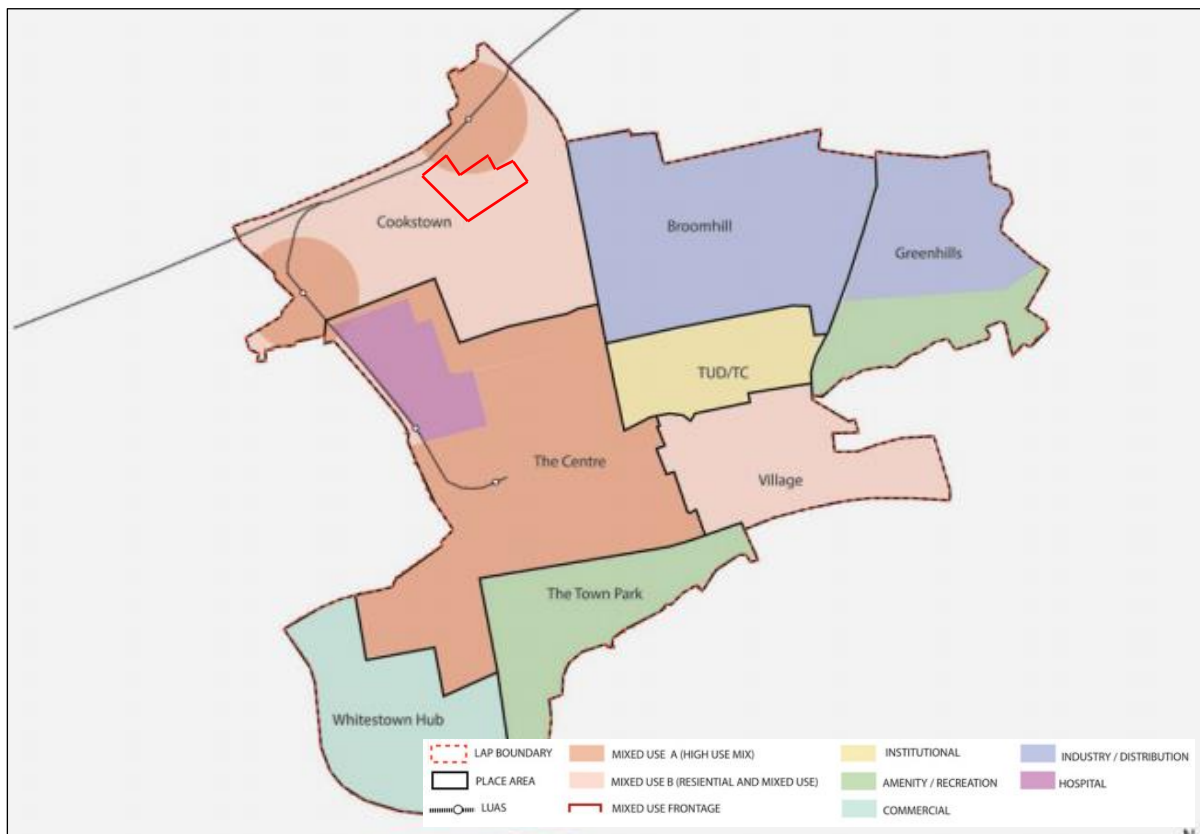


Figure 86.0 Urban Function Map from Tallaght Town Centre Local Area Plan 2020-2026 (subject site identified in red)



Figure 87.0 Mixed Use Frontage map from Tallaght Town Centre Local Area Plan 2020-2026 (subject site identified in red)

The subject proposal features a creche, 4 no. commercial/retail units and communal amenity spaces serving the 'build-to-rent' units along the Cookstown Road and Old Belgard Road frontages and the sites frontage along the proposed new through route to the south of the site.

It is submitted that the proposed 'build-to-rent' housing development is compliant with the use mix and mixed-use frontage objectives for the land and is therefore in accordance with the proper planning and sustainable development of the area.

6.15.2 Key Objectives

The following Key Objectives are outlined for 'Cookstown' Neighbourhood in Section 3.3 of the LAP:

- CK1: Emergence of a vibrant mixed use residential-led neighbourhood.
- CK2: Create new urban block structure.
- CK3: Deliver a mix of new open spaces, including provision of a new urban square or plaza at a central location at, or in close proximity to, the junction of Cookstown Road and Second Avenue. The exact location, design and delivery of this space to be progressed by SDCC in discussion with landowners in the area.
- CK4: Improve legibility throughout the area and provision of new streets linking to nearby hubs and The Centre.
- CK5: Delivery of a variety of building types around Luas stops.
- CK6: Support provision of a new primary school if deemed necessary by Department of Education and Science.
- CK7: Utilising location as source of River Poddle, incorporating it into public realm and open space and green/blue infrastructure asset strategies.
- CK8: Encourage and facilitate higher intensity employment uses and economic development.

- *CK9: Encourage design proposals to provide appropriate space to accommodate nonresidential uses, particularly for existing businesses in the Cookstown area which can be appropriately accommodated in a mixed-use development with a substantial residential component.*
- *CK10: Explore the feasibility of uplifting the River Poddle and incorporating into public realm, open space and green/blue infrastructure asset strategies as part of proposals for development.*

The subject proposal helps achieve the above key objectives as it:

- Introduces a residential, office and commercial/retail development, in blocks of varying height, to this underutilised site which immediately abuts the Belgard Luas Stop;
- Creates a new urban block structure in this part of the Cookstown Industrial Estate. This comes as a result of breaking the larger parcel into smaller blocks through the introduction of 2 no. north-south streets and an east-west link as well as pedestrian links through the proposed buildings. This improves urban legibility throughout the area;
- Provides blocks along the Cookstown Road, Old Belgard Road and new street frontages as well as adjacent to the newly created pedestrian/cycle path which creates a link between Cookstown Road and the Belgard Luas Stop;
- Provides a mix of communal and public open spaces throughout the development including a 1688sqm public plaza in the south-western corner of the site which complements a large area of public open space earmarked for the site immediately south in the Tallaght Town Centre Local Area Plan 2020-2026; and
- Improves the condition of existing streets/public realm by setting back buildings elevations to create pedestrian friendly spaces and also proposes road, junction and streetscape upgrades along the Cookstown Road, First Avenue and Old Belgard Road.

The following area specific requirements are set out for the CT-D sub-neighbourhood within the Cookstown neighbourhood:

Physical	Upgrade / enhancements required to Cookstown Road in order to facilitate development within CT-C, including public realm improvements, pedestrian, cyclist linkages and potential alternative routing for HGV traffic.	Developer	In tandem with development
	Enhanced pedestrian and cyclist linkages to Belgard Luas Stop.	Developer	In tandem with development
	Removal / undergrounding of 110kv overhead power lines at northern section of Cookstown, linked to proximity and set back required by ESBI on relevant sites.	Developer	In tandem with development
	Provision of Belgard Square North Link Road to facilitate direct link to Town Centre from Central Cookstown.	SDCC	2020-2026
	New secondary route between Cookstown Road and Belgard Road.	Developer	In tandem with development
Open Space	Upgrade and enhancement landscaping works to open space alongside Luas line as part of proposals for development along the northern boundary of CT-C, in consultation with TII and SDCC Parks Department.	Developer	In tandem with development
	Proposals for residential development in this area to provide for the delivery of Cookstown Urban Square, as per the criteria set out in Section 8.4.2, in tandem with development, unless otherwise agreed with the Planning Authority in regard to securing the provision of this open space.	Developer	In tandem with development

The subject proposal is consistent with the area specific requirements as it:

- Proposes road, junction and streetscape upgrades along the Cookstown Road, First Avenue and Old Belgard Road, including removal of existing high kerbs and provision of pedestrian and cycle paths;
- Includes a cycle/pedestrian link between Cookstown Road and the Belgard Luas Stop;
- Includes a new secondary route between Cookstown Road and Old Belgard Road; and
- Includes a public plaza in the south-western corner of the site which will tie in with the Cookstown Urban Square proposed immediately south.

6.15.3 Plot Ratio, Height and Built Form

Plot Ratio, Height and Built Form (discussed in Section 2.6 of the Draft LAP) will be used to determine and assess the intensity, scale and bulk of development in the Plan lands. The design and layout of each plot will need to take account of its context and be designed accordingly.

Plot Ratio

To inform the assessment of each planning application, plot ratio will be used as an important determinant in assessing the intensity of a proposed development. Table 2.0 included in Section 2.6.1 of the LAP sets out a range of appropriate plot ratios across the plan lands. A plot ratio range of 1.5-2.0 was set in relation to the CT-D parcel within the Cookstown Neighbourhood.

The plot ratio and building height of any proposed development shall not normally exceed the maximum plot ratio or building height thresholds for any particular site, block or parcel of land. 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. The plot ratio ranges and additional 20% floorspace bonus shall normally be calculated on the basis of the gross site area. 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 subject proposal benefits from the 20% allowable increase as the proposed development will result in significant public gain. The public gain resulting from the proposed development includes the following:

- Road, junction and streetscape upgrades along First Avenue, Cookstown Road and Old Belgard Road, including the installation a signalized junction at the intersection of First Avenue and Cookstown Road and the intersection of Old Belgard Road and Cookstown Road;
- Provision of 6,680sqm of public open space (which is 3% in excess of the standard 10% requirement for public open space on site), including a 1688sqm public plaza within the south-western corner of the site which complements the new urban square proposed immediately south;
- Creation of 3 no. new vehicular streets and links that provide access through the site. This includes an east-west link between the Old Belgard Road and Cookstown Road proposed along the subject site's southern boundary and 2 no. north-south streets connecting the newly created east-west link with the Cookstown Road; and
- Creation of 1 no. new pedestrian/cycle link through the site, more specifically along the eastern boundary, which provides a link between Cookstown Road and the Belgard Luas Stop.

The proposed development is for 1104 no. 'build-to-rent' residential apartments which equates to a plot ratio of 2.4 which is consistent with the specified plot ratio range inclusive of the 20% allowable increase to gross floor area (which allows for a plot ratio of 2.4).

It is worth noting that the plot ratio has been calculated conservatively using the developable site area in the ownership of the Applicants. If the entire site boundary inclusive of road/footpaths etc. (which equates to 49,900sqm) was to be used in its calculation, the resultant plot ratio would be 1.82 which would also comply with the Local Area Plan Requirement. Please see the Schedule of Accommodation, prepared by C+W O'Brien Architects, for further information on the plot ratio calculation for the scheme.

Height

In general terms, the height strategy included in the Tallaght Town Centre LAP provides for the following:

- *Building height and scale is greatest in the Centre, in close proximity to Luas stops and along arterial and primary route frontages (6–7 storeys Residential, +1 recessed and 5–6 storeys non-residential, +1 recessed).*
- *Building height and scale on secondary routes/frontages is lesser but still within an urban scale, (4–6 storeys Residential, 3–5 storeys non-residential and building height is lower along tertiary routes, within the network of secondary streets).*

As mentioned previously, the subject site is situated within an area known as the ‘Cookstown’ Neighbourhood Area under the LAP. This area is designated for buildings of 6 to 7 storeys in height along the sites northern boundary and in the south-eastern corner of the site; 4 to 6 storeys along the sites remaining frontage to Old Belgard Road, frontage to Cookstown Road (west) and the development frontage to the east-west link between the Old Belgard Road and Cookstown Road proposed along the subject site’s southern boundary; and 3 to 4 storeys elsewhere, as shown in the Overall Urban Structure (Cookstown) Diagram in Figure 88.0 below.

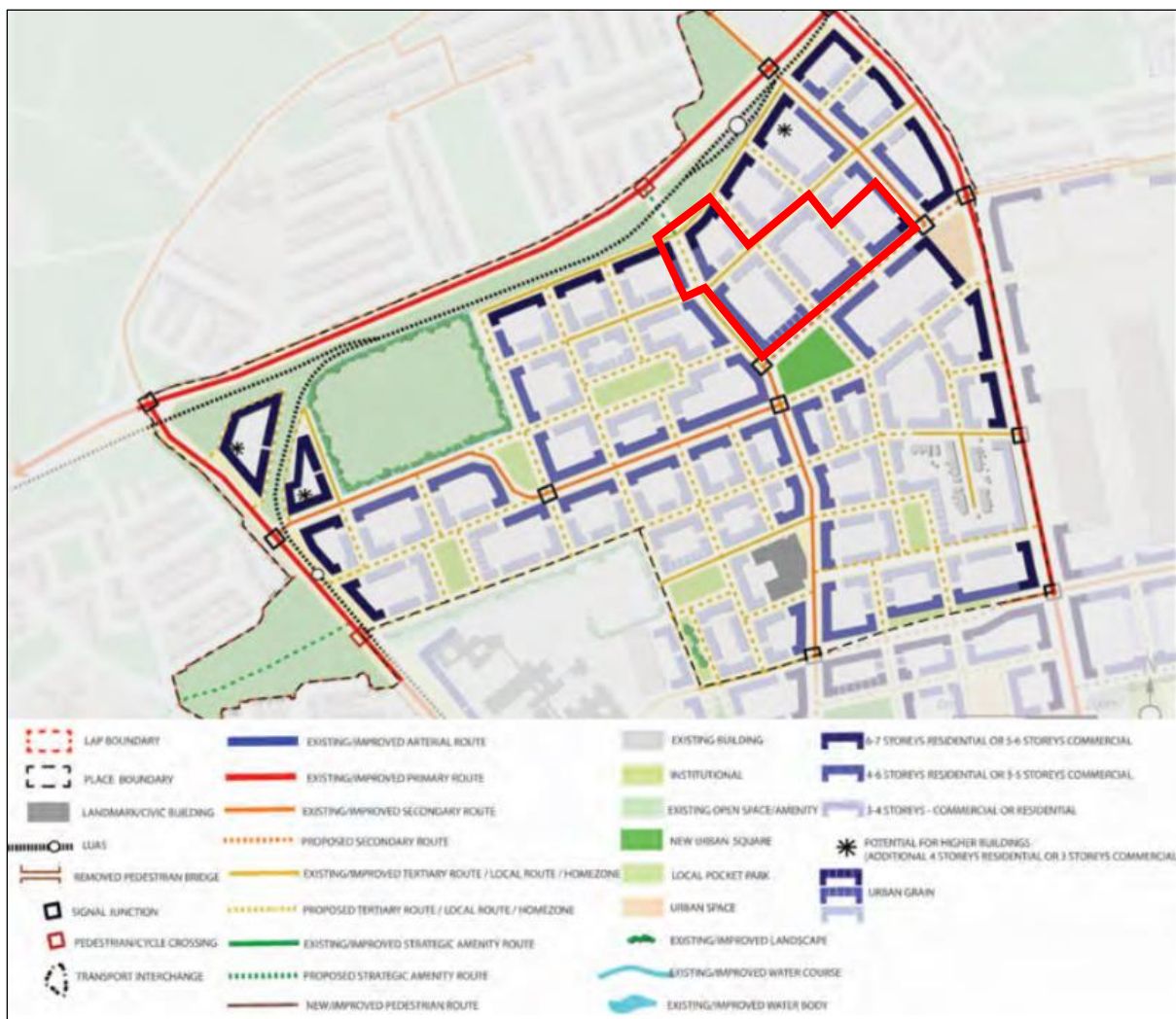


Figure 88.0 Overall Urban Structure Diagram included in Figure 3.3 in Section 3.2 of the LAP (subject site identified with red line)

Figure 2.7, included in Section 2.6.2 of the LAP, illustrates the LAP's "Density Strategy" (an excerpt of which is included in Figure 89.0 below). It indicates the subject site with a purple colour due to its proximity to the Belgard Luas stop – the same density designation as that of applied to the Tallaght Town Centre. The purple colour is applied to areas where higher densities are encouraged.

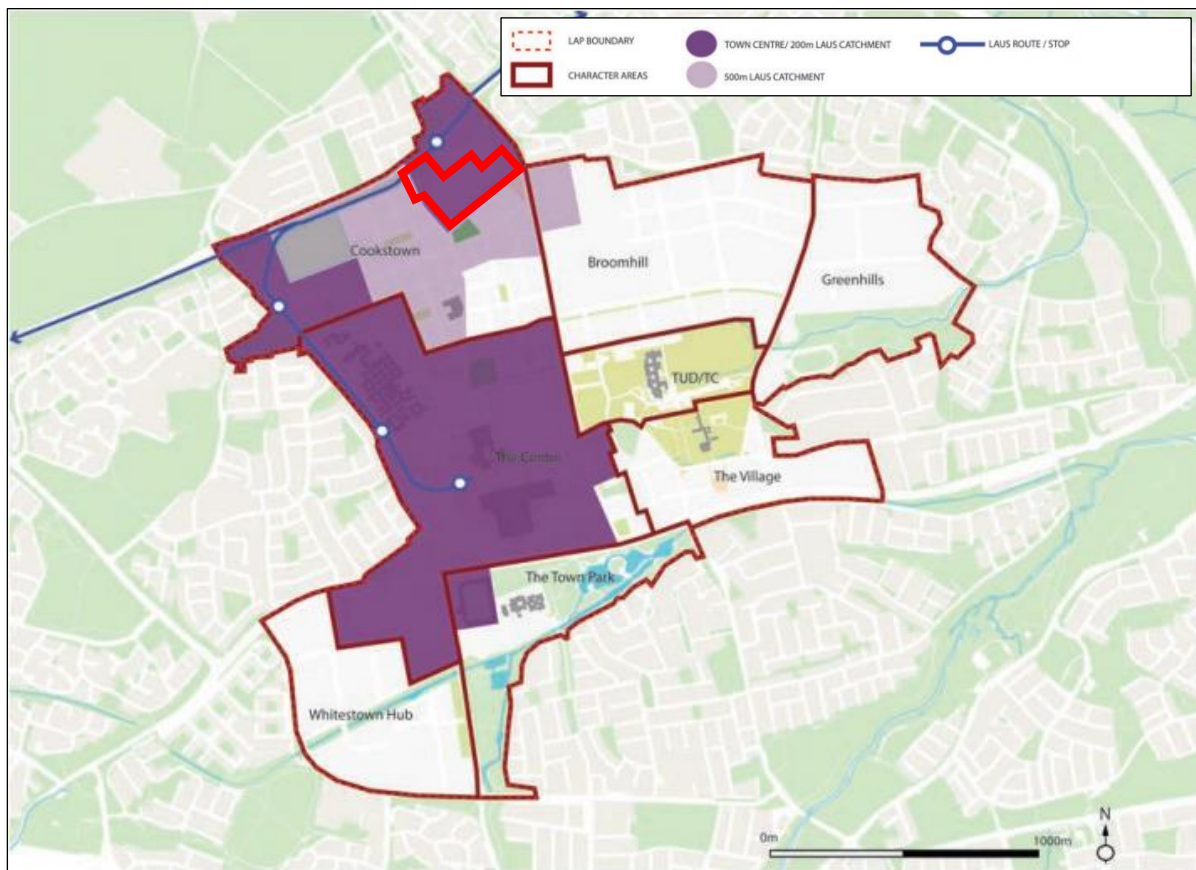


Figure 89.0 Density Strategy included in Figure 2.7 in Section 2.6.2 of the LAP (subject site identified with red line)

Section 2.6.2 states the following in relation to 'Landmark Buildings':

In the interest of place making and improving legibility, Landmark Buildings are permissible at key locations that will punctuate urban areas. In general, buildings that exceed the prescribed general buildings heights should only be provided at the locations indicated as having 'Potential for Higher Buildings' in the Building Height Strategy (see Figure 2.4) and at locations adjacent to the key public transport stops and key public spaces identified in Section 2.6.

A 2–4 storey increase on the above typical levels may be considered for key or landmark sites or where sites exceed 2ha in area and can establish its own identity (see Section 8.2 Implementation).

Section 2.6 states:

To reflect the importance of placemaking at key public transport stops and key public spaces, flexibility in relation to the plot ratio range and the potential for higher buildings (2-4 storey increase on typical levels set in the LAP) may be considered at certain locations which are considered to be key or landmark sites, subject to exceptional design which creates a feature of architectural interest, a significant contribution to the public realm at these locations and mixed uses at ground floor level. These requirements are subject to criteria for taller buildings set out in Section 2.6.2. This provision may apply where the site is directly adjacent to the following:

- *High capacity public transport stops (i.e. a Luas stop or high frequency bus stop (i.e. 10-minute peak hour frequency) on a dedicated bus lane);*
- *The proposed 'New Urban Square' north of Belgard Square North in the Centre neighbourhood;*
- *The proposed 'New Urban Square' within the Cookstown neighbourhood; and*
- *The proposed Transport Interchange and adjacent proposed 'Urban Space' in the Centre neighbourhood.*

This provision will only apply to the extent of a site which is within 100m walking distance of the above locations and will only be considered where the Planning Authority is satisfied that provision of the above facilities will be achieved.

The subject site is located immediately north-west of the proposed 'New Urban Square' within the Centre neighbourhood and is directly adjacent to the Belgard Luas Stop as illustrated in the plan excerpt included previously at Figure 88.0.

The proposed development occupies c. 4.99Ha located to the west of Old Belgard Road and east of the intersection of First Avenue and Cookstown Road. It varies in height from varies in height from 4-11 storeys, rising to 11 storeys in the south-western corner of the site. The 11 storey component included in the south-western corner of the site, sits immediately north of the proposed public plaza on the subject site.

The departure from the heights recommended in the LAP is considered appropriate in this instance as there have been considerable changes in National and Regional policy guidance regarding housing provision, including the introduction of the Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018 (discussed further in Section 6.3 previously). These new National and Regional policies encouraged increase heights and intensification of development on sites well served by public transport, such as the subject site.

It is also submitted that the proposed heights are justifiable for the following reasons:

- The higher built form elements proposed within the development are of a high architectural quality and create a high-quality built environment in this area;
- The 11-storey landmark building, in the south-western corner of the subject site, provides a gateway to the Cookstown area as well as the adjacent public park;
- Increased height at this location is appropriate given the availability of public transport;
- The subject of site is c. 5Ha in size and is therefore of a large enough scale to accommodate taller buildings;
- The proposed development will create a better public realm, additional streets/through roads in Cookstown and a pedestrian link to the adjacent Belgard Luas Stop, resulting in significant public gain;
- The proposed development will increase permeability through the area, providing connections to public transport, Tallaght Town Centre, employment centres and TU Tallaght; and
- The increased height of the proposed development will allow for more residential units to be provided at a time when homes are in short supply.

It is worth noting that the Inspector Report, associated with the recently granted Strategic Housing Development at Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate, Dublin 24 under ABP Ref. ABP-308398-20, included the following positive commentary regarding the applicable development's exceedance of the heights outlined in the Tallaght Town Centre Local Area Plan 2020-2026:

10.3.1. Section 2.6 Intensity of Development of the LAP acknowledges that the large scale regeneration of the Tallaght LAP lands will give rise to a new built form that will be different to the type of buildings that predominate in the area today. The proposed development would be significantly denser than the adjoining industrial units and should be viewed in the context of the surrounding area which has experienced a transition towards to a more urban / denser area, with a mix of uses, including apartment blocks of varying heights and significantly increased densities. In this regard recent grants of permission, include ABP 306705-20 granted in 2020 for the construction of 502 no. apartments, a creche and 3 no.

retail units in a development with a maximum height of 8-storeys at the junction of Airton Road and Greenhills Road, approx. 500m east of the subject site; ABP 305763-19 granted in 2020 for the demolition of existing buildings and the construction of 328 no. apartments and a creche in a development with a maximum height of 9-storeys, at the junction of Belgard Road and Airton Road, approx. 375m east of the subject site; ABP 303306-19 granted in 2019 for the construction of 438 no. apartments and 403 no. student bedspaces, a crèche and 6 no. retail / commercial units in 5 no. blocks with a maximum height of 10 storeys, at the junction of Belgard Road and Belgard Square located approx. 90m east of the subject site. ABP 303803-19 granted in 2019 for the construction of 196 no. 'build to rent' apartments and a creche, in a development with a maximum height of 9- storeys, at the junction of Second Avenue and Cookstown Way, approx. 550m north west of the subject site. Having regard to these recent planning permissions in the wider area, it is my view that the surrounding area is in transition and undergoing a major change in its profile of development and that the proposed development would reinforce that changing profile.

10.4.7. In conclusion, I have no objection in principle to the proposed height or design of the development. While it is acknowledged that it would introduce a new feature in the skyline it is my view that it would not result in an overbearing impact, overdevelopment of the site or have a negative visual impact.

The appropriateness of the proposed building height is discussed in further detail in the Statement of Material Contravention, prepared by Hughes Planning and Development Consultants, submitted with this application.

The LAP notes that proposed building heights must be supported by design data and studies confirming compliance with established sunlight, daylight, overlooking and other residential amenity minimum design standards as required under Design Standards for New Apartments (2018). Building heights will also be evaluated against topography, cultural context, key landmarks, and key views as required by Building Height Guidelines.

The application is accompanied by a Sunlight, Daylight and Shadow Assessment Report, prepared by JAK Consulting Engineers, that confirms that the residents of the proposed apartments or users of the proposed central courtyards/roof terraces will be afforded a high level of amenity. The application is also accompanied by a Travel Plan, prepared by NRB Consulting Engineers, which illustrates the high level of access to public transport this site benefits from.

Built Form

Specific guidance is provided in relation to built form, more specifically street interface, urban grain and building setback, in Section 2.6.2 of the Draft LAP. The proposed development is consistent with this guidance as:

- The proposed development provides a strong building frontage allow the adjacent street edges;
- It creates active ground floor frontages due to the inclusion of active residential (front doors, windows) uses along the Cookstown Road and the proposed new street frontages; and
- The building has been designed to clearly express the ground floor and features distinctive main façade and a strong parapet. Individual buildings within blocks express distinctive building design elements due to differing heights, materials/finishes and design elements.

6.15.4 Street Network and Route Structure

As discussed in Section 2.2.1, the LAP sets out a street network and route structure which provides the basic physical framework for the plan lands and provides a framework for urban blocks and open spaces. Existing and planned streets are classified within a new hierarchy on the basis of their function, context and location. Pedestrian and cycle accessibility and movement are key components of the overall Urban Framework for the Plan. As illustrated, in the plan excerpt included at Figure 70.0 previously, the southern part of the subject site is earmarked for the introduction of a secondary route linking the Old Belgard Road and Cookstown Road and 3 no. tertiary route/local route/homezones, 2 no. centrally on the site and 1 no. along the site's eastern boundary linking Cookstown Road with the Belgard Luas Stop.

This has been taken into consideration when designing the subject proposal, with the building adopting a generous setback off the southern and eastern boundaries and breaks proposed between blocks to facilitate the introduction of the secondary route linking the Old Belgard Road and Cookstown Road, 2 no. tertiary route/local route/homezones linking the newly created secondary route with Cookstown Road and a pedestrian/cycle link to the Belgard Luas Stop from Cookstown Road. Further to this, the subject proposal includes road and streetscape upgrades along First Avenue, Old Belgard Road and Cookstown Road which includes removal of existing high kerbs. This will help create the residential street character sought by the LAP and also improve cycle and pedestrian connections throughout the area.

6.15.5 Block Size and Form

Section 2.6.3 of the LAP sets out policies in relation to block size and form.

Block Size

Section 2.6.3 outlines the following in relation to block size:

Block sizes in the Centre and Cookstown neighbourhood should have dimensions of approximately 60 to 80 metres and shall be no more than 100 metres in length/depth.

The subject proposal is consistent with the above as no blocks proposed exceed the above recommendations.

Block Form

Section 2.6.3 outlines the following in relation to block form:

New buildings shall be laid out in perimeter blocks across the Plan lands. Such blocks shall be used to enclose private and semi-private open spaces and, depending on the context and demonstration of need, larger blocks or irregular sized blocks may contain small scale development. All perimeter blocks shall be designed according to the following principles:

- *Building massing to the perimeter of the block;*
- *Building frontage to all sides, including the shorter sides (secondary street frontage) of the block;*
- *Proper design and attention to corners, avoiding dead or windowless gables;*
- *A continuity of building frontage, which relates to the local or urban context, and avoidance of blank walls;*
- *An appropriate scale of buildings to provide the appropriate level of enclosure of the streets and spaces;*
- *Adequate back-to-back distances within the block;*
- *Appropriate building setbacks from the street in line with the use of ground floors;*
- *Adequate arrangements for car parking and access around, within or below the block;*
- *Carefully considered subdivision of the block into plots where fine urban grain or mixed use is proposed; and*
- *Appropriate consideration of building height within the block to facilitate adequate levels of sunlight and daylight penetration.*

The subject proposal is consistent with the above as:- the proposal introduces blocks along the old Belgard Road and Cookstown Road frontages as well as the new street frontage proposed along the southern boundary and centrally; the proposal provides landscaped courtyards which have been sited to increase solar access whilst also providing separation between buildings; the building's facades feature windows and balconies which ensure they don't present as blank walls; the proposed development is provided with access to a suitably designed ground floor car parking areas which are appropriately screened from view; and the development's higher elements have been positioned in such a way to reduce potential reductions in sunlight and daylight penetration.

6.15.6 Housing Mix and Options

Section 5.2.1 of the LAP, includes the following policy in relation to housing mix:

It is policy of the Council to ensure an appropriate housing mix is provided within the LAP lands, therefore a minimum of 30% of units within any new residential development (in the form of either apartments or houses, but excluding student accommodation schemes) shall have a minimum of 3 bedrooms.

Section 5.2.2 includes the following policies in relation to housing/occupancy mix:

In the interest of providing an appropriate housing tenure mix it is policy of the Council that all residential development proposals shall state the proposed tenure mix and provide justification for the proposed mix having regard to the socio economic and demographic context of the area. It is an ambition of the LAP to encourage the provision of at least 30% owner occupied units across the LAP area.

This provision will be reviewed pending the completion of a Housing Need and Demand Assessment (HNDA) for the Dublin area.

On sites where a developer demonstrates that 30% private sale/owner occupation units cannot be achieved based on assessment against Plan criteria including viability considerations, an alternative scenario may be considered. However, provision of more than 60% BTR must be accompanied by evidence that the level of BTR provided is justified.

Section 5.2.2 of the LAP also outlines the following policy specifically relating to Build-to-Rent proposals:

It is the policy of the Council to support Build to Rent developments that comply with the housing/occupancy mix requirement specified in this Section and national policy, in particular with the policies and objectives set out in 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)'.

The proposed development complies is compliant with the above in certain regards, providing a mix of apartments, including studios, 1-bedroom apartments, 2-bedroom apartments and 3-bedroom apartments, in a variety of styles/configurations. The proposed development also features 10% social housing units.

We note that the proposed development falls short of the recommended 30% minimum of 3/3+ bedroom units set out, 3 bedroom apartments comprising 4% of the overall apartments proposed. We would argue that a reduced no. of 3-bedroom apartments can be justified given the nature of the proposed developments, being build-to-rent, which generates a requirement for smaller apartments. We would also argue that a limited market exists in relation 3/3+ bedroom units in this area and the scheme would be unviable if this 30% were to be provided. If unviable, the scheme is unlikely to be developed and much needed housing units will not be realised and the National policy objectives regarding housing provision will not be realised.

The appropriateness of the proposed housing mix is discussed in further detail in the Statement of Material Contravention, prepared by Hughes Planning and Development Consultants, submitted with this application.

We note that the proposed development exceeds the recommended 60% maximum recommended in relation to dwelling units for Build to Rent and is devoid of owner-occupied units as is encouraged in Section 5.2.2 of the LAP. The proposed unit type/mix can be justified having regard to the existing and recently permitted developments in the area forming the subject of the Tallaght Town Centre Local Area Plan 2020-2026.

In the context of the broader Tallaght Town Centre Local Area Plan area, traditionally the housing stock provided in the applicable area has been build-to-sell. The concept of build-to-rent being a relatively new one. To date, only 2 no. planning applications involving 'Build-to-Rent' apartments have been

granted planning permission through the Strategic Housing Development process (under ABP Ref. ABP-303803-19 and ABP Ref. ABP-308398-20) in the area forming the subject of the Tallaght Town Centre Local Area Plan 2020-2026. These approvals were for the following development:

- Units 5A-C Second Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24, under ABP Ref. ABP-303803-19:

Demolition of the existing 2,590sq.m industrial building and the construction of a 'build-to-rent' housing development providing a total of 196 no. residential apartments (comprising 45 no. studio units, 48 no. one-bed units, 8 no. two-bed (3-person) units and 95 no. two-bed (4-person) units) in 4 no. six-nine storey blocks over basement. The development will include 1 no. commercial unit (248sqm, accommodating Class 1, 2 and 8 uses as per the Planning and Development Regulations, 2001 – 2018) at ground floor level, 1 no. office unit (111sqm) at ground floor level; a crèche (192sqm) at ground floor level; a gym (18sqm) at ground floor level; 6 no. communal amenity spaces provided at ground and first floor levels across the development (totalling 286sqm); a communal hot desk room (25sqm) at ground floor level; and 3 no. communal secure storage areas (totalling 31sqm) at ground floor level; along with a ground floor level landscaped courtyard, 408 no. bicycle spaces (308 no. resident spaces at basement level and 100 no. visitor spaces at ground floor level); an underground carpark (accessed from Second Avenue, providing a total of 67 parking spaces (including 61 no. standard spaces and 6 no. mobility impaired user parking spaces)) and refuse/waste/recycling stores. Associated site and infrastructural works are also proposed which include: foul and surface water drainage; attenuation tanks; lighting; landscaping; boundary fences; plant areas; ESB Substations; internal hard landscaping, including footpaths and street furniture; and all associated site development works.

- Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate, Dublin 24, under ABP Ref. ABP-308398-20:

Demolition of the existing industrial buildings (2,518sq.m); (ii) construction of: (a) 252 no. 'build-to-rent' apartments (comprising 50 no. studios, 96 no. one-bed apartments; 100 no. two-bed apartments and 6 no. three-bed apartments) in a two to nine storey development. Each apartment has associated private open space in the form of a ground floor terrace or a balcony and has access to 613sqm 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); 1792sqm of external communal amenity space at first and second floor levels; and a 65sqm 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 no. parking spaces (including 58 no. standard spaces, 10 no. go-car spaces and 5 no. mobility impaired user parking spaces) and 500 no. bicycle spaces at ground floor level (372 no. resident spaces and 128 no. visitor spaces); and (b) 2 no. commercial units (comprising of a 95sqm unit accommodating a café/restaurant and a 145sqm unit accommodating Class 1, 2 and 8 uses as per the Planning and Development Regulations, 2001-2019, as amended) and a 275sqm crèche, with associated 86sqm play area, at ground floor level; (iii) road, junction and streetscape upgrade works along Fourth Avenue and Cookstown Road, including the installation a signalized junction at the intersection of Fourth Avenue and Cookstown Road; (iv) Construction of a temporary access road along the southern site boundary; and (v) associated site and infrastructural works are also proposed which include: foul and surface water drainage; attenuation tanks; lighting; landscaping; boundary treatment; plant areas; ESB substations; and all associated site development works. (Please note: Condition No. 2 included in the Board's order requires changes to the building height of Blocks A and B and the relocation of the proposed creche which necessitates a reduction in the overall apartment nos.)

It is worth noting that the Inspector Report, associated with the recently granted Strategic Housing Development at Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate, Dublin 24 under ABP Ref. ABP-308398-20, included the following commentary regarding the applicable development's non-compliance with the housing mix outlined in the Tallaght Town Centre Local Area Plan 2020-2026:

10.6.2. *Third parties have also raised concerns regarding the proposed housing mix and consider it would have a negative impact on the local community. With regard to BTR schemes, SPPR 8(i) of the Apartment Guidelines states that no restrictions on dwelling mix shall apply. The concerns of the planning authority and the third parties are noted, however, having regard to the justification provided above for the provision of BTR scheme at this location and to guidance set out in the Apartments Guidelines it is my view that the proposed housing mix is appropriate in this instance. The issue of material contravention is dealt with below.*

1 no. other Strategic Housing Development proposal involving Build-to-Rent units submitted in the area forming the subject of the Tallaght Town Centre Local Area Plan 2020-2026 was refused permission. The details of this application are as follows:

- On 19th June 2019, a development was refused at Unit 21 First Avenue, Cookstown Industrial Estate, Dublin 24 (under ABP Ref. ABP-303911-19), involving the following (in summary):

The demolition of 5,500 square metres of existing one and two-storey industrial buildings (including a small operating café) and associated site clearance works, and the construction of 150 no. 'Build-to-Rent' apartments in three number, five to six storey blocks and 222 number Shared Living units in a fourth, six to eight storey (parapet level) block.

The other Strategic Housing Developments considered by the Board in the area forming the subject of the Tallaght Town Centre Local Area Plan 2020-2026, included a different type/mix of residential units to that proposed on the subject site. These applications include the following:

- On 15th April 2019, a development was approved at Belgard Gardens, Belgard Square North and Belgard Road, Tallaght, Dublin 24, (under ABP Ref. ABP-303306-18) involving the following (in summary):

Demolition of all existing buildings and construction of a mixed use residential development (total GFA 55,180 sqm) comprising a new urban quarter and streets with 5 no. blocks to provide 438 no. apartment units (including live/work units) and associated amenity facilities, a 403 no. bedspace student accommodation scheme and associated amenity facilities, childcare facility (c.380 sqm), 6 no. retail / commercial units (c.632 sqm in total) and a security room (c.52 sqm).

- On 20th February 2020, a development was approved at the corner of Airton Road and Belgard Road, Tallaght, Dublin 24, (under Case Ref. ABP-305763-19) involving the following (in summary):

Demolition of the existing industrial buildings on site (4,800sq.m) and the construction of 2 no. blocks comprising 328 no. apartments, ancillary residential support facilities and commercial floorspace measuring 31,147sq.m gross floor space above a single basement level.

- On 16th June 2020, a development was approved at the Former Gallaher's cigarette factory site at the junction of Airton Road & Greenhills Road, Tallaght, Dublin 24, (under ABP Ref. ABP-306705-20) involving the following (in summary):

Demolition of existing factory/warehouse buildings on site; construction of 502 no. apartments, 3 no. retail units and a creche, within 6 no. blocks ranging in height from 4 to 8 storeys; provision of road improvements and pedestrian crossings; and all associated site development works and services provision.

A review of the An Bord Pleanála and South Dublin County Council planning registers revealed no planning applications involving 'Build-to-Rent' units currently being considered in the area forming the subject of the Tallaght Town Centre Local Area Plan 2020-2026.

In light of the above, we consider that the proposed scheme will not result in an overconcentration of Build-to-Rent units in the area forming the subject of the Tallaght Town Centre Local Area Plan 2020-2026. Furthermore, we would also argue that this prescriptive requirement is contrary to National Policy Guidance, including the Building Height Guidelines.

The subject application is accompanied by a Commentary on the Private Rented Sector / Market Demand, prepared by Cushman Wakefield, and a Build to Rent Market Justification Report, prepared by LIV Consulting, which provide an economic and planning rationale for this housing typology at this location

6.15.7 Implementation and Sequencing

Section 8.0 of the LAP includes the following objective in relation to implementation and sequencing of development in the LAP area:

It is an objective of the Council that development within the plan area is undertaken in an orderly and sustainable manner. The development of the identified regeneration lands at Cookstown and Broomhill alongside the Town Centre lands should generally be phased in accordance with the sequential approach:

- *Development should extend outwards from the town centre and high-quality public transport with land closest to the centre and public transport nodes being given preference, i.e. 'leapfrogging' to stand alone or isolated areas should be avoided; and*
- *A strong emphasis will be placed on encouraging infill opportunities adjacent to compatible existing uses and ensuring better use of under-utilised lands;*

Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved or where proposals are brought forward for sites approximately 2 Hectares and above, particularly within the regeneration lands that comply with the Urban Framework of the LAP, the Planning Authority may consider that the proposal can establish its own identity and amenity in the transition phase of the area.

The following implementation design criteria are set out, in Section 8.2.1, in relation to sequencing of development in Regeneration Zoning:

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 subject proposal is consistent with the above objectives and implementation design criteria for the following reasons:

- The subject site is in close proximity to the Belgard Luas Stop and provides a pedestrian/cycle link between Cookstown Road and the Belgard Luas Stop;
- The subject infill development makes better use of this underutilised land; and
- The road, junction and streetscape upgrades proposed as part of the development, as well as the development itself, will create a more urban form of development and a traditional street network.

7.0 Social and Affordable Housing

7.1 Part V, Section 96 of the Planning and Development Act

Part V, Section 96 of the Planning and Development Act 2000 (as amended), applies to this application. New provisions relating to Part V, under the Urban Regeneration and Housing Act 2015, were formally enacted on 1st September 2015. Since 31 August 2015, 2 guidance circulars have been issued by the Department and one Guideline under section 28 of the Planning and Development Act 2000:

Circular Housing 33 of 2015 of 31 August 2015

Urban Regeneration and Housing Act 2015 – amendments to the operation of Part V of the Planning and Development Act 2000.

Circular PL 10/2015 and Housing 36/2015 of 30 November 2015

Part V - Implementation of Article 22(2)(e) of the Planning and Development Regulations 2001, as amended – Validation of Planning Applications.

7.2 South Dublin County Development Plan 2016-2022

The following policies included in the South Dublin County Development Plan 2016-2022 have specific regard to the provision of social and affordable housing:

Policy H1: *It is the policy of the Council to implement the Interim South Dublin County Council Housing Strategy 2016-2022 (and any superseding Housing Strategy agreed by the Council) and to carry out a review of the Housing Strategy as part of the mandatory Two Year Development Plan review.*

H1 Objective 1: To significantly increase the stock of social housing in the direct control of South Dublin County Council in order to meet the long term housing needs of those households on the local authority housing list.

H1 Objective 2: To apply a 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended) to all sites that are zoned solely for residential use, or for a mixture of residential and other uses (save where the development qualifies for a modified or amended obligation or is otherwise exempted).

H1 Objective 4: To promote social integration and facilitate a diverse range of dwelling tenures within housing developments, including social housing in a balanced way in all Local Electoral Areas of the County.

H1 Objective 7: To meet the County's need for social housing provision through a range of mechanisms, including Part V of the Planning and Development Act 2000 (as amended), a social housing building programme, acquisition, leasing, Housing Assistance Payment (HAP) scheme, Rental Accommodation Schemes (RAS) and the utilisation of existing housing stock. This should include for the provision of one bedroom units for homeless housing need.

7.3 Tallaght Town Centre Local Area Plan 2020-2026

The following policy included in the Tallaght Town Centre Local Area Plan 2020-2026 has specific regard to the provision of social and affordable housing:

It is policy of the Council to apply a 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended) to all sites in the Plan area that are solely for residential use or for a mixture of residential and other uses (save where the development qualifies for a modified or amended obligation or is otherwise exempted), to ensure an appropriate distribution of new social housing and to avoid an excessive concentration of social housing (Objective RE 6).

7.4 Part V Proposal

The applicants propose to fulfil their Part V obligations through entering into a lease agreement with the Planning Authority for 10% of the housing units pursuant to Section 96(3) paragraph (b)(iv)(a) of the Act.

The applicant has engaged in discussions with the Housing Department of South Dublin County Council in respect to Part V. The applicant has engaged in discussions with the Housing Department of South Dublin County Council in respect to Part V and they agree in principle with the Part V proposal put forward. A letter from South Dublin County Council's Housing Department confirming this accompanies this application under a separate cover.

The applicant confirms their willingness to enter into an agreement with South Dublin County Council in respect of Part V (Social and Affordable Housing) should a grant of planning permission be forthcoming at the subject site, in accordance with the relevant provisions of Planning and Development Act 2000 (as amended).

8.0 Environmental/Appropriate Assessment

An Environmental Impact Assessment Report and an Appropriate Assessment Screening Report have been prepared as part of this application which looks at the potential effects of the proposed project on the receiving environment and Natura 2000 sites, respectively. They accompany this planning application under a separate cover. In summary, there are no apparent characteristics or elements of the design of the scheme that are likely to cause significant effects on the environment or Natura 2000 sites.

9.0 Conclusion

In conclusion, we submit that the proposal which comprises the demolition of the existing industrial units on site and the construction of a mixed-use development, featuring 1,104 no. Build-to-Rent apartments, on lands West of Old Belgard Road and North, South & West of Cookstown Road, Cookstown Industrial Estate, Tallaght, Dublin 24, is considered to be acceptable and compliant with the policies and objectives as set out in the applicable national, regional and local planning policy context.

At a national and regional level, this statement has demonstrated consistency with the following:

- Project Ireland 2040 – National Planning Framework (2018);
- National Development Plan 2018-2027;
- Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018;
- Rebuilding Ireland – Action Plan for Housing and Homelessness, July 2016;
- Department of Housing, Planning and Local Government Circular PL 8/2016 APH 2/2016;
- Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007);
- Sustainable Residential Development in Urban Areas – Guidelines for Planning Guidelines (2009);
- Urban Design Manual – A Best Practice Guide 2009;

- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018);
- Design Manual for Urban Roads and Streets (2013);
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);
- Guidelines for Planning Authorities on Childcare Facilities (2001); and
- Regional Spatial & Economic Strategy for the Eastern and Midland Regional Assembly, 2019.

Consistency is also demonstrated with the policies and provisions of the South Dublin County Development Plan 2016-2022 and the Tallaght Town Centre Local Area Plan 2020-2026, which are the key planning policy documents at a local level.

It is considered that the proposed mixed-use development, featuring 1104 no. apartments, at this application site in the Cookstown Industrial Estate Area presents an appropriately scaled residential development on residentially zoned land.

It is considered that the subject site, being located within close proximity to a third level institution, hospital, the Tallaght Town Centre and the Belgard Luas stop, has the capacity to accommodate additional residential accommodation and respond to the current housing shortage.

The development has been designed to an exceptionally high standard to contribute to the urban form of the area and it is considered that the proposal will not give rise to any undue impacts on the amenity of any adjacent properties. We are of the opinion that the development is generally compliant and in accordance with the qualitative and quantitative standards as set out in the relevant statutory development plans and other national guidance documents.



Margaret Commane MIPI
Associate
for and on behalf of HPDC.