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# **Statement of Response to Pre-application Consultation Opinion**

## **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 &  
Boherkill Property Development Ltd**

**February 2021**



**Hughes Planning & Development Consultants**

70 Pearse Street, Dublin 2  
+353 (0)1 539 0710 – info@hpdc.ie – www.hpdc.ie

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## 1.0 Introduction

Hughes Planning and Development Consultants, 70 Pearse Street, Dublin 2, have prepared this Statement of Response to Pre-application Consultation Opinion 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 Build-to-Rent development at Lands West of Old Belgard Road and North, South & West of Cookstown Road, Cookstown Industrial Estate, Tallaght, Dublin 24. 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 facilitated on 16<sup>th</sup> December 2019.

An Bord Pleanála subsequently issued a Notice of Pre-Application Consultation Opinion on 29<sup>th</sup> 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 Baldonnel 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.*

Further to the above, the Board's Notice of Pre-Application Consultation Opinion set out the statutory bodies to be notified of the making an application, pursuant to section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016. They are as follows:

1. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority
4. Irish Water (*duplication of No. 1*)
5. Irish Aviation Authority
6. Department of Defence
7. South Dublin County Childcare Committee

A copy of the current application has been sent to the prescribed bodies identified by the Board. Copies of the applicable cover letters are enclosed with the application.

## **2.0 Response to Issues Raised**

The following sets out how the applicant and design team have addressed the 3 no. issues raised in the Board's Notice of Pre-Application Consultation Opinion to ensure the subject application constitutes a reasonable basis for an application for strategic housing development.

### **2.1 Applicants Response to Item No. 1**

The subject application site has been assembled over a number of years and presents an outstanding opportunity to kick start development in this industrial area that is expressly identified in the South Dublin County Council Development Plan 2016-2022 for 'regeneration'. The proposed development will facilitate the delivery, inter alia, of 1104 build to rent apartments in the short term in direct response to the national housing crisis.

The architectural drawing set and Design Statement, prepared by C+W O'Brien Architects, includes a Masterplan Drawing at page 25 (an excerpt of which is included below for ease of reference) which illustrates how the subject development will integrate with the regeneration of adjoining sites and the rest of the industrial estate.



Figure 1.0 Excerpt of Masterplan, prepared by C+W O'Brien Architects, illustrating developments approved/proposed in the Cookstown Industrial Estate

The challenges presented by the construction of new mixed use and residential development in an existing, albeit transitioning, industrial area are fully recognised by the applicant. Accordingly, the applicant has had full regard to recent planning decisions in the area and welcomes the adoption of the new Local Area Plan which now provides the planning framework that ABP previously considered lacking. Within this framework in place this development will act as a catalyst to the transformation of this industrial estate into a series of interconnected residential and mixed use neighbourhoods.

The applicant has assembled an experienced and professional design team that has considered and responded to the new LAP, the evolving national planning guidelines, relevant planning history in the area and to the advice given by South Dublin County Council and An Bord Pleanala at pre-application consultation stage. The way in which the proposed development has evolved during the planning consultation process is described in Chapter 2 of the EIAR, more specifically in Section 2.4.4, and in Section 3.0 of the Statement of Consistency & Planning Report, prepared by Hughes Planning and Development Consultants.

In response to the current planning policy provisions and to the instructive meetings held with SDCC and ABP the applicant is confident it can be demonstrated that the proposed scheme will 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; the extent and layout of open space; and the mix of uses incorporating the provision of supporting social and commercial services including childcare.

The subject application site is the ideal starting point for the regeneration of the northern part of the Cookstown Industrial Estate for a no. of reasons.

- The subject site comprises a large parcel of land (4.99Ha) 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 replaced with a more residential environment.
- The site benefits from immediate proximity to the Luas Red Line Station at Belgard and a new pedestrian linkage to this station (provided with the consent of Dublin City Council) will be delivered in Phase 1 of the proposed development providing a significant planning gain for the coherent redevelopment of the area. It is envisaged that the phasing of development will progress initially with those parts of the site that are nearest the station and will be completed, in time, with those elements that are more distant from the Luas stop, as illustrated in Drawing No. P19127-CWO-00-00-DR-A-0015, prepared by C+W O'Brien Architects (an excerpt of which is provided below at Figure 2.0).

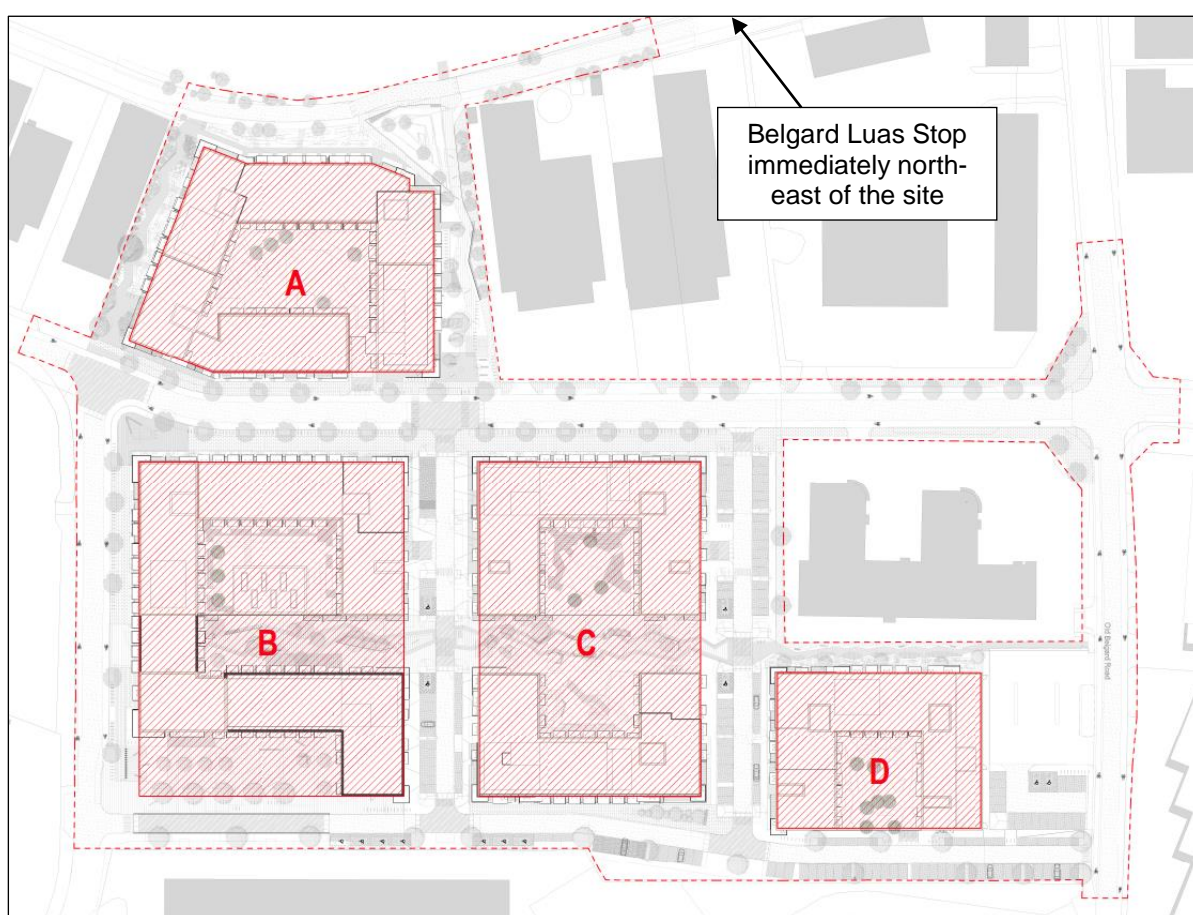


Figure 2.0 Phasing proposal outlined in Drawing No. P19127-CWO-00-00-DR-A-0015, prepared by C+W O'Brien Architects

- Further to this, the greatly improved connectivity and accessibility (which is best illustrated in the proposed connectivity diagrams included at pages 28 and 29 of the Design Statement, prepared by C+W O'Brien Architects, an excerpt of which is included in Figures 3.0 and 4.0 below) will also benefit the development of nearby sites one of which was refused permission for reasons of not being "in accordance with an appropriate sequential development of these Regeneration (REGEN) zoned lands as a whole" (ABP Ref. 303911-19).



Figure 3.0 Proposed Connectivity – Streetscape Diagram included in the Design Statement, prepared by C+W O’Brien Architects



Figure 4.0 Proposed Connectivity - Site Permeability Diagram included in the Design Statement, prepared by C+W O’Brien Architects, with pedestrian cycle links provided to Luas Stop encircled in yellow

- 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.
- With the provision of a safe, overlooked, and illuminated pedestrian and cycle path to the Belgard Luas station (as illustrated in the CGIs included at Figures 5.0 and 6.0 below and overleaf) the site can provide direct and proximate accessibility, via dedicated linkages incorporated into the development, to the high capacity and frequent public transport LUAS and Bus services to and from Tallaght Town Centre, Tallaght Hospital and all stops between Cookstown and the City Centre. Block A has been designed to include apartments and communal amenity spaces with an outlook onto the proposed pedestrian and cycle path. The passive surveillance afforded by these apartments/communal amenity spaces, as well as public lighting provided in this area, ensures that the pedestrian and cycle path offers a safe environment for its user.



Figure 5.0 CGI, prepared by 3D Design Bureau illustrating the high quality pedestrian and cycle path provided adjacent to Block - taken from north-east corner of the site looking south-west



Figure 6.0 CGI, prepared by 3D Design Bureau illustrating the high quality pedestrian and cycle path provided adjacent to Block - taken from Cookstown Road looking north-west

- Having regard to the proposed high quality connectivity of the site to a high capacity public transport corridor it is ideally suited to Build-to-Rent as the predominant land use. The Build-to-Rent model enables the provision of higher density residential units in closer proximity of the LUAS stop which is central to the design and layout of the development. The number, size and type of the proposed residential units will contribute greatly to sustainable development and the optimisation of the patronage of this public transport service. It accords with good planning principles and the LAP to promote high density in proximity to the LUAS stop with less high densities being delivered in locations more than 800 metres away from the LUAS stop; this proximity to Luas will be key to the quality of life of this sustainable community and Neighbourhood. The sustainable community benefit of the site in this regard cannot be underutilised by the provision of lower density development close to a LUAS stop.
- The layout, design and height of the proposed buildings in turn is a response to the close proximity of the proposed development to the Belgard Luas Stop, the national and local planning policy provisions and the commercial needs of the site. In addition to Build-to-Rent that will accommodate a wide range of occupants (including young professionals, young families, mature families, mature couples and single persons) 10% of the residential units are to be set aside for Council's Part V social and affordable requirements.
- The residential scheme will be fully supported by a mix of social and commercial services (4 No. commercial units, multiple floors of office space and a crèche). These complementary uses will contribute greatly towards the generation of a sustainable local community in this new neighbourhood consistent with the objectives of the LAP

The proposals consistency with the provisions of the South Dublin County Development Plan 2016-2022, including core strategy, and Tallaght Town Centre Local Area Plan 2020-2026 is discussed in the Statement of Consistency and Planning Report, prepared by Hughes Planning and Development Consultants. More specifically, in Sections 6.14 and 6.15, respectively.



## 2.2 Applicants Response to Item No. 2

In response to the feedback received at the SHD pre-planning consultation with An Bord Pleanála, as well as feedback received in S247 consultations with South Dublin County Council, the application site boundary has been extended to include land in the ownership of South Dublin County Council and Dublin City Council (the necessary consent letters accompany this application). This extension to the application site boundary has facilitated the following improvements to the scheme:

- The creation of a pedestrian/cycle link adjacent to the site's eastern boundary providing a connection between Cookstown Road and the Belgard Luas Stop; and
- Road, junction and streetscape upgrade works along First Avenue, Cookstown Road and Old Belgard Road. These upgrade works will include the installation a signalized junction at the intersection of First Avenue and Cookstown Road and Old Belgard Road and Cookstown Road; the removal of existing high curbs and the provision of appropriate pedestrian and cycle paths within the immediately surrounding streets.

The proposed pedestrian/cycle link and the road, junction and streetscape upgrade works proposed along First Avenue, Cookstown Road and Old Belgard Road facilitate suitable access for pedestrians and other road users from the proposed development to public transport facilities, places of employment and commercial and social services.

In terms of ***'The documentation should demonstrate whether the street network would provide adequate access for pedestrians and other road users 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'***, the best reference to where this is addressed is within **Appendix I** of the Transportation Assessment Report, prepared by NRB Consulting Engineers which accompanies this application, and we highlight the following:

- The design of the local replacement streets within the Red Line have been carefully undertaken, so as to be fully consistent with DMURS, and a DMURS 'Statement of Consistency' is included herein as Appendix I of the Transportation Assessment Report;
- The DMURS Statement of Consistency states; - *"The proposed layout strategy seeks to maximise connectivity between key local destinations through the provision of a high level of permeability and legibility for all journeys, particularly for sustainable forms of travel (cycling and walking). The proposed residential scheme delivers greater mode and route choices along direct, attractive and safe linkages to local amenities and schools/service destinations through replacement of the existing industrial estate roads with modern streets"*;
- The DMURS Statement of Consistency goes on to state; *"High Quality Connections between the proposed development and the employment areas and facilities within Tallaght, are provided"*; and
- The Independent Safety Audit included as **Appendix G** included a review of accessibility for cyclists, pedestrians and mobility impaired users and all of the issues raised by the Audit Team are incorporated in the proposed development.

In terms of ***'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'*** we highlight the following: -

- The planning application includes for the construction of a dedicated link to the Belgard LUAS Stop, and a letter of consent from the landowner (in this case Dublin City Council, which is a historic carry-over) has been received and is included as part of the planning application;
- All of the existing industrial estate roads & associated junctions within the red line of the planning application are being replaced with modern residential estate quality links and infrastructure, and **Section 2.11** of the Transportation Assessment Report states; -

There are planned road improvements as part of this application, included as works within the red line, that will improve accessibility and increase local road permeability of the subject sites. The accessibility/permeability will be enhanced for all transport modes, with the removal of the inappropriate infrastructure and the replacement with modern residential-type infrastructure. The proposed altered internal roads will in particular increase accessibility to established public transport services and community facilities. The roadworks included in the application include:-

- The replacement & re-construction of Cookstown E-W road, along the northern extremity of the site,
- The replacement & re-construction of Cookstown N-S road, along the western boundary of the site,
- The replacement of 2 traditional Industrial Estate Roundabouts with at grade traffic signal controlled crossings (including pedestrian/cyclists priority within the sequence of the signals),
- The creation of a high quality pedestrian route and link to the Belgard LUAS,
- New roads and links internally within the site, and
- All roads, footpaths, crossings, cyclists facilities and infrastructure constructed to standards that are consistent with a modern residential area.

The upgrade works proposed to the existing industrial estate roads and associated junctions are best illustrated in the drawing excerpt included in Figure 7.0 and the photomontages/CGIs included in Figures 8.0 and 9.0, below and overleaf.



Figure 7.0 Excerpt from Drawing No. NRB-TA-001, prepared by NRB Consulting Engineers, included at Appendix A of the Transportation Assessment Report



Figure 8.0 Image, taken by 3D Design Bureau, of the existing junction/roads at the intersection of First Avenue and Cookstown Road



Figure 9.0 Verified view montage, prepared by 3D Design Bureau, of the proposed junction/roads at the intersection of First Avenue and Cookstown Road

- Car parking is being provided significantly below the maximum standards as set out within the South Dublin County Development Plan 2016-2022, with on average an approximate ratio of 0.3 per residential unit, including on-street provision. The lower provision of car parking will act as a demand management measure, ensuring that the development is accessed in the most sustainable manner, being almost predominantly reliant on non-car modes of travel. The lower provision of car parking is supported by a working Mobility Management Plan.

In terms of ***'If separate cyclist facilities are proposed, the documentation should demonstrate whether they would comply with The National Cycle Manual and provide proper priority for cyclists over vehicles existing from minor roads at junctions'*** we highlight the following:

- Proposed Cycle facilities on the Larger Public Roads are compliant with the National Cycle Manual (NCM) (NCM pages 12 & 83), with advance cycle facilities and Toucan type crossings incorporated into all signal controlled junctions. Internally, for the minor streets, the cyclists infrastructure is also consistent with the NCM (NCM Pages 54 & 55).
- Pedestrian and cyclist priority at minor roads, and associated traffic calming, is achieved through the use of raised platforms which afford priority to pedestrians and cyclists.

The cycle infrastructure proposed is best illustrated in the drawing excerpt included in Figure 10.0 below.

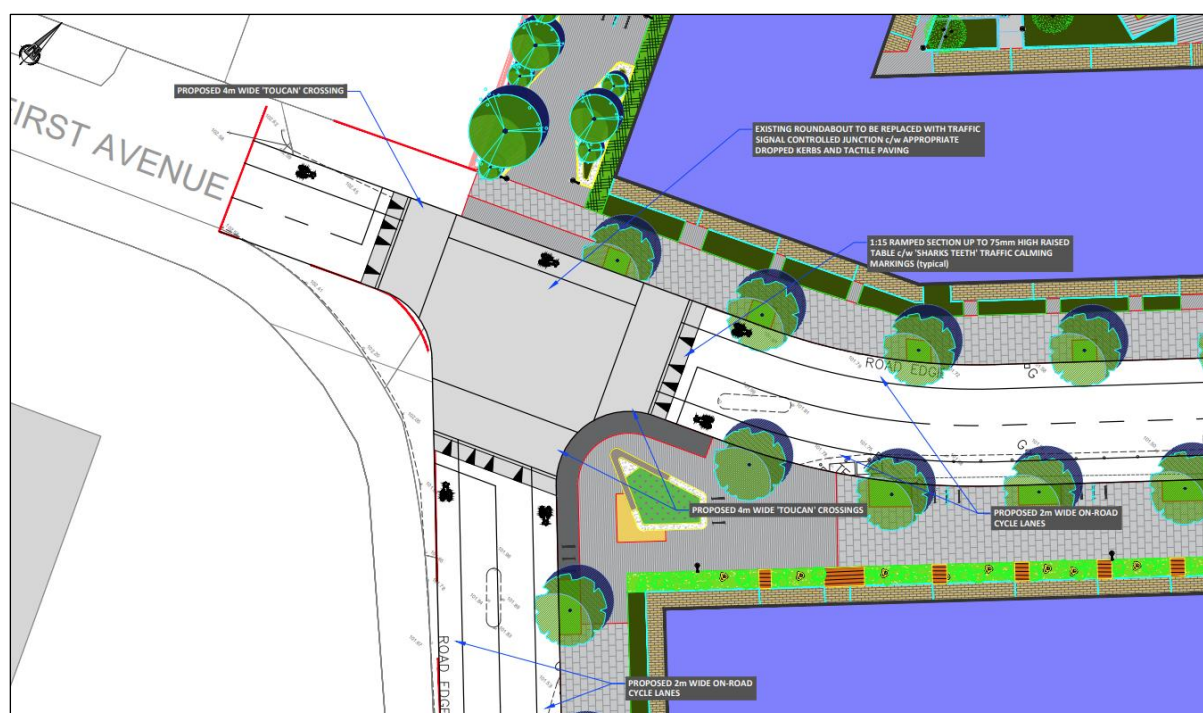


Figure 10.0 Excerpt from Drawing No. NRB-TA-002, prepared by NRB Consulting Engineers, included at Appendix A of the Transportation Assessment Report

In terms of ***'The documentation should also provide a rationale for the proposed provision of parking for cars and bicycles'***, we highlight the following;

- A comprehensive rationale supporting the provision of Bicycle Parking & Car Parking numbers is set out in the detailed Transportation Assessment Report (Paragraph 2.15 to 2.34 inclusive). As discussed previously, car parking is being provided significantly below the maximum standards as set out within the South Dublin County Council Development Plan 2016-2022, with on average an approximate ratio of 0.3 per residential unit, including on-street provision. The lower provision of car parking is considered appropriate in this instance given the site immediately abuts the Belgard Luas stop and the site's proximity to a no. of bus services as well existing services and employment providers. The proposed car parking rate is consistent

with national planning policy. The application is accompanied by a Preliminary Mobility Management Plan (Travel Plan), prepared by NRB Consulting Engineers (featuring at Appendix H of the Transportation Assessment Report, a copy of which is included at Appendix 10.1). The development is served by 1,860 no. bicycle parking spaces (1,464 no. resident bicycle spaces and 396 no. visitor bicycle spaces) which exceeds the requirements set out in the Apartment Guideline and the South Dublin County Development Plan 2016-2022.

Please refer to the Transportation Assessment Report (Section 5.0 more specifically pages 24 to 26) and the Material Assets Chapter (the Traffic/Transportation/Roads Section at Section 10.10 on page 162) of the EIAR, both prepared by NRB Consulting Engineers, for further information in relation to Item No. 2 included in the Board's opinion.

It is NRB Consulting Engineers's opinion that the proposed Residential Development Layout and associated roads are consistent with both the principles and guidance outlined within the Design Manual for Urban Roads and Streets (DMURS) 2013, as amended in 2019. The scheme proposals are the outcome of an integrated design approach, in which the evolution of the development design incorporated various mitigation measures and development proposals in response to a series of consultations with SDCC and ABP. This approach seeks to implement a sustainable community connected by well-designed links, layout and accesses – which, when combined, will deliver attractive, convenient and safe slow mode access to this residential development, in addition to promoting modal shift and viable alternatives to car-based journeys. The resultant proposed Cookstown Castle Development provides for an enhanced high quality and easily accessible sustainable community-based neighbourhood.

### **2.3 Applicants Response to Item No. 3**

In response to the issues raised by South Dublin County Council's Water Services on SHD pre-planning application, in their report dated 27<sup>th</sup> January 2020, GDCL Consulting Engineers on behalf of the Applicants have liaised with South Dublin County Council's Water Services in advancing the final scheme and provided additional information pertaining to their concern items. A copy of a letter prepared and submitted to South Dublin County Council's Water Services by GDCL Consulting Engineers in this regard is provided at Appendix A.

In response to issues raised by Irish Water in their Confirmation of Feasibility Statement, dated 28<sup>th</sup> May 2019, GDCL Consulting Engineers on behalf of the Applicants have liaised with Irish Water in advancing the final scheme and have prepared a diversion proposal to address their concerns raised. The proposed diversion has been accepted by Irish Water. A copy of the applicable correspondence confirming Irish Water's acceptance of the proposed diversion is included at Appendix F of the Engineering Services Report, prepared by GDCL Consulting Engineers. A copy of the subsequently issued Statement of Design Acceptance is also included in Appendix F to the Engineering Services Report, prepared by GDCL Consulting Engineers.

### **3.0 Statement of Response to Specific Information Required**

The following sets out how the applicant has addressed the Board's request for additional specific information in respect of the proposed development.

#### **3.1 Housing Quality Assessment/Dual Aspect Apartments/Build-to-Rent Apartments/ Information required under SPPR 7 of the Guidelines/Building Lifecycle Report**

The architectural drawing set, prepared by C+W O'Brien Architects, includes a Housing Quality Assessment and the Design Statement, at Section 12.1, demarcates the dual/triple aspect apartments proposed within the development. The architectural drawing set (Drawings Nos. P19127-CWO-01-00-DR-A-1100, P19127-CWO-01-07-DR-A-1107, P19127-CWO-02-00-DR-A-1200, P19127-CWO-02-01-DR-A-1201, P19127-CWO-02-08-DR-A-1208, P19127-CWO-03-00-DR-A-1300, P19127-CWO-03-07-DR-A-1307, P19127-CWO-03-08-DR-A-1308 and P19127-CWO-04-00-DR-A-1400); Sections 5.0 and 6.9 of the Statement of Consistency & Planning Report, prepared by Hughes Planning and Development Consultants, and Sections 4.0 and 5.0 of the BTR Operational Management Plan, prepared by LIV Consulting, also detail the resident support facilities and resident services and amenities serving the proposed Build-to-Rent apartments. The application is also accompanied by a

draft legal agreement, prepared by a suitably qualified person, and a Building Lifecycle Report, prepared by AWN Consulting Ltd.

### **3.2 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.**

The proposed developments compliance with the Guidelines for Planning Authorities on Urban Development and Building Heights is discussed in Section 6.3 of the Statement of Consistency & Planning Report and Section 5.3.2 of the Statement of Material Contravention, prepared by Hughes Planning and Development Consultants, which accompany this application.

### **3.3 Report addressing the potential for the proposed development to affect the use of Baldonnell Aerodrome and the helipad at Tallaght Hospital**

The application is accompanied by an Aeronautical Assessment Report, prepared by O'Dwyer & Jones Design Partnership. These reports address the potential for the proposed development to affect the use of Baldonnell Aerodrome and the helipad at Tallaght Hospital.

### **3.4 Daylight and Sunlight Analysis**

The application is accompanied by a Sunlight, Daylight and Shadow Assessment Report, prepared by JAK Consulting Engineers.

### **3.5 Phasing Scheme**

The architectural drawing set, prepared by C+W O'Brien Architects, which accompanies the application includes a phasing scheme for the development. Please refer to Drawing No. P19127-CWO-00-00-DR-A-0015.

### **3.6 Landscaping and Open Space Strategy**

The application is accompanied by a Landscape Strategy and Design Report and associated landscape drawings, prepared by Cunnane Stratton Reynolds, which details the landscape and open space strategy for the proposed development.

### **3.7 Proposals in respect of the 110kV line**

As indicated in architectural drawing set (more specifically, Drawing No. P19127-CWO-00-00-DR-A-0010), prepared by C+W O'Brien Architects, which accompanies the application, the proposed development adopts a minimum setback of 23 metres from the 110kV line featuring immediately north of the site. This setback is consistent with the guidance set out in the Code of Practice for Avoiding Danger from Overhead Electricity Lines, May 2019. The guidance set out in the Code of Practice for Avoiding Danger from Overhead Electricity Lines, May 2019, in relation to construction will be followed when the development comes to be built.

### **3.8 Draft Construction Management Plan**

The application is accompanied by an Outline Construction Environmental Management Plan, prepared by AWN Consulting Ltd.

### **3.9 Draft Waste Management Plan**

The application is accompanied by an Operational Waste Management Plan and a Construction & Demolition Waste Management Plan, both prepared by AWN Consulting Ltd.

#### 4.0 Conclusion

This report sets out how the various issues raised by An Bord Pleanála, in their Notice of Pre-Application Consultation Opinion, in relation to the proposed mixed-use development on lands west of Old Belgard Road and north, south & west Cookstown Road, Cookstown Industrial Estate, Tallaght, Dublin 24.

The layout and design changes incorporated into the final scheme are considered to result in improvements to the overall development and ensure that a high-quality residential development will be provided.

It is therefore submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines.



Margaret Commane MIPI  
Associate  
for and on behalf of HPDC.

## **Appendix A**

Letter prepared and submitted to South Dublin County Council's Water Services by GDCL Consulting Engineers regarding submissions on SHD pre-planning application