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# **Planning Statement of Consistency & Planning Report**

## **‘Build-To-Rent’ Housing Development**

**Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate,  
Tallaght, Dublin 24**

**Steelworks Property Developments Limited**

**October 2019**



**Hughes Planning & Development Consultants**

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## 1.0 Introduction

Hughes Planning and Development Consultants, 70 Pearse Street, Dublin 2, have prepared this planning statement of consistency on behalf of our client, Steelworks Property Developments Limited, to accompany a planning application to An Bord Pleanála for a proposed Strategic Housing Development at Units 66 & 67 Fourth Avenue, 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 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.*

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.

## 2.0 Site Location and Description

The subject application involves a parcel of land located to the south-west of the intersection of Fourth Avenue and Cookstown Road, Cookstown Industrial Estate, Tallaght, Dublin 24. The subject site comprises an area of approximately 0.71 Ha (1.75 acres) and is currently occupied by Units 66 & 67 Fourth Avenue. There are existing low-rise industrial buildings (which have a floor area of 2,518sq.m) featuring on the subject sites. These are proposed for demolition as part of the subject proposal.

The site is located within an area comprising industrial land uses immediately east, west and north and a neglected open space area immediately south and south-west. It is noted that the Cookstown Road, which currently terminates approximately 57 metres south of the Fourth Avenue and Cookstown Road roundabout (adjacent to the subject site's south-eastern corner) is currently being extended southwards, through the adjacent neglected open space area, to link up with Belgard Square North.

The subject site is located within the Cookstown Industrial Estate. 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. A number of large scale residential and mixed-use developments have been approved in the surrounding area in recent times (discussed further in Section 4.2).



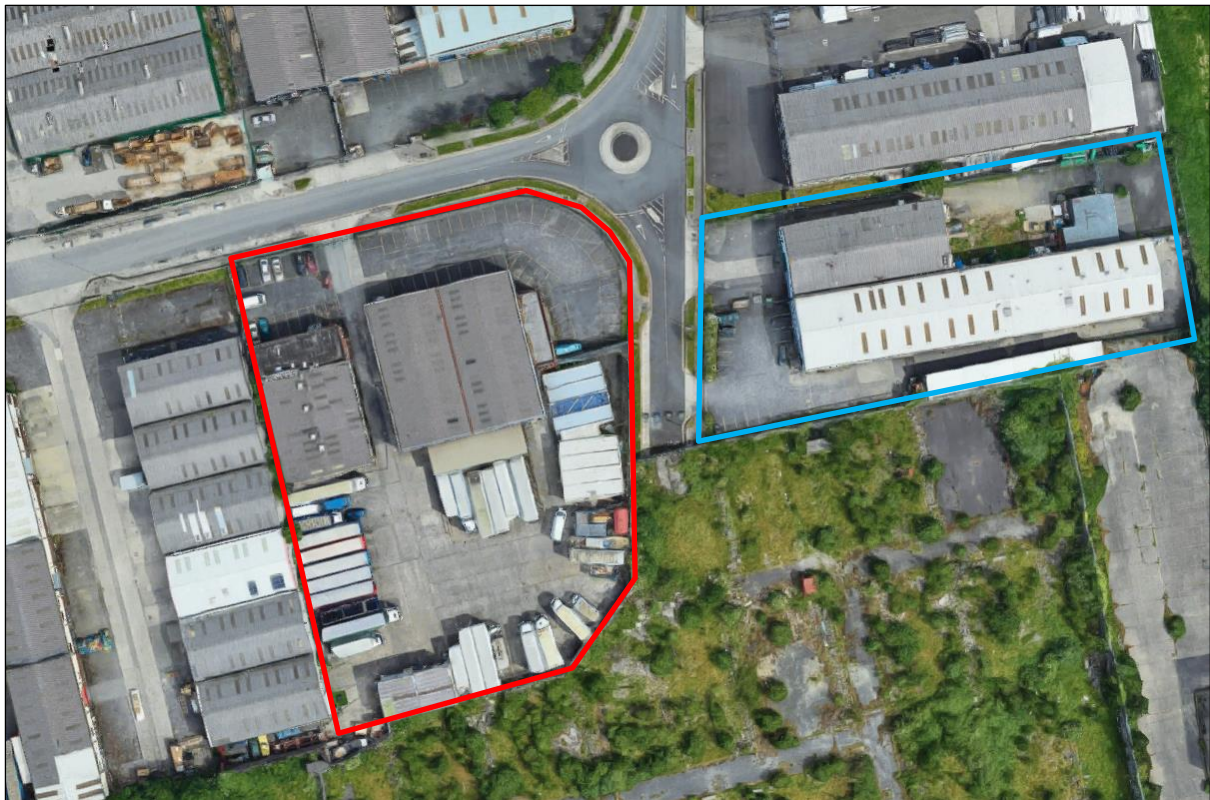


Figure 1.0 Locational context of the subject site, the subject site outlined in red and other parcel of land forming part of pre-planning discussions (known as Site B) outlined in blue



Figure 2.0 Existing view of the subject site as viewed from the intersection of Cookstown Road and Fourth Avenue and Fourth Avenue (left) and Fourth Avenue (right)

More broadly, Tallaght's Town Centre is situated south of the subject site. The proposed extension to Cookstown Road will provide the subject site with direct access to this area. Tallaght's Town Centre is characterised by high rise, high density mixed-use development, with building heights ranging between two and twelve storeys. The mix of uses are predominantly residential over ground floor retail/commercial use.

Tallaght Hospital is situated to the west of the subject site, more specifically Site A sits approximately 220 metres east of the hospital. Tallaght Institute of Technology is situated to the east of the subject sites, more specifically Site A sits approximately 400 metres west of the institute.

A strong feature of the site is its proximity to the Tallaght Hospital LUAS stop, which is located on Cookstown Way, approximately 800 metres from 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. It is also noted that the site is in close proximity to frequent Dublin Bus services along Belgard Square North and Cookstown Way, with buses offering service to the City Centre, Tallaght Hospital and The Square Tallaght.

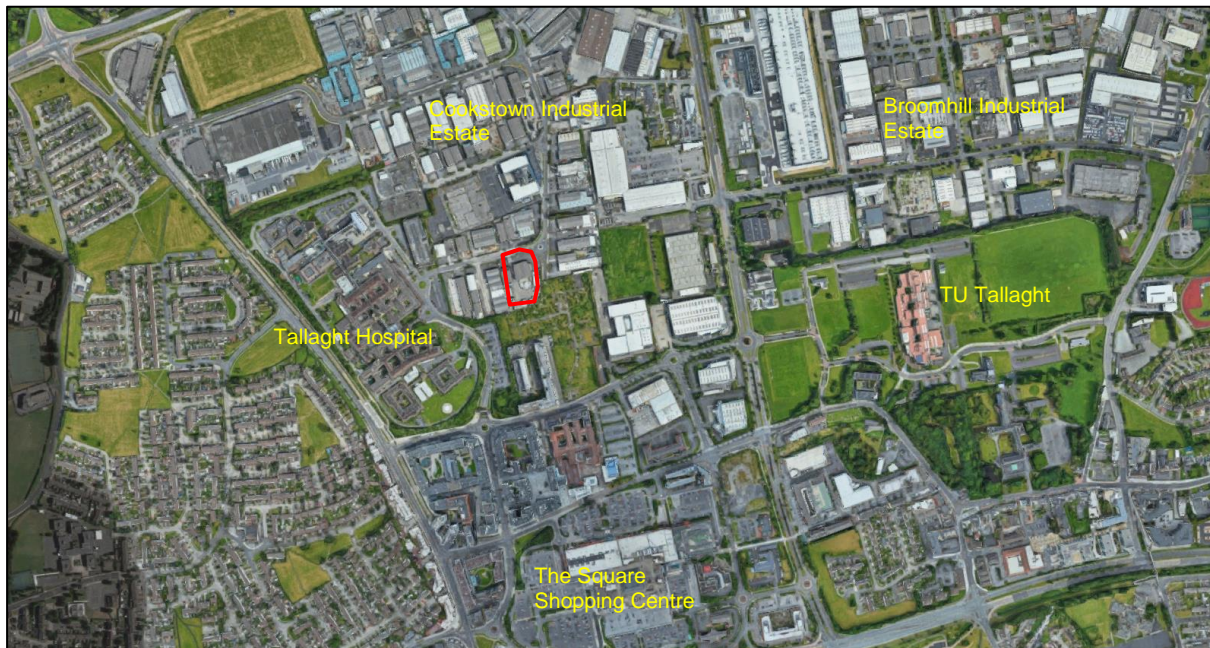


Figure 4.0 Aerial image showing the application site (outlined in red) in the context of the wider area land uses

It was intended, at pre-planning stage, to include Units 69 & 70 Cookstown Road (referred to as Site B in pre-planning correspondence and identified in blue in Figure 1.0 above) in this application, however, following the feedback received at pre-planning consultation with An Bord Pleanála, it was decided that the development of Units 69 & 70 Cookstown Road would be premature pending the provision of the Airton Link Road.

### 3.0 Section 247 Pre-planning Consultations

We note that two Section 247 Consultation meetings took place with the Planning Authority in relation to this application. They are discussed in turn below and overleaf.

#### Meeting No. 1 (Ref. No. SHD1SPP012/18)

Date: 20<sup>th</sup> July 2018

Attendees: Jim Johnston - Senior Executive Planner, South Dublin County Council  
 Colin Clarke – Executive Planner, South Dublin County Council  
 Adrian Barrett – Senior Executive Engineer, South Dublin County Council  
 Robert Roche – Assistant Engineer, South Dublin County Council  
 Arthur O'Brien - Lead Partner, C+W O'Brien Architects  
 Calogero Marino - BIM Manager & Senior Architectural Technologist, C+W O'Brien Architects  
 Daniela Sánchez - Architect, C+W O'Brien Architects  
 Jim Egan – Associate, Hughes Planning and Development Consultants  
 Eoin Reynolds – Director, NRB Consulting Engineers  
 Greg Daly – Director, GDCL Consulting Engineers  
 Lucy Carey - Principal Landscape Architect, Cunnane Stratton Reynolds  
 Joseph Costello – Applicant Group  
 Karl Hannigan – Applicant Group

C+W O'Brien Architects and Hughes Planning and Development Consultant gave a presentation on the



proposed development, including the site's planning history; the site context; and the zoning applying to and planning policy context for the subject site. This pre-planning meeting revolved around a pre-planning pack circulated prior to the meeting which proposed the following (as illustrated in Figures 5.0, 6.0 and 7.0 below and overleaf):

*Demolition of the existing industrial units on the two sites and the construction of a 'build-to-rent' housing development providing a total of 336 no. residential apartments (comprising 62 no. studio units, 68 no. one-bed units, 23 no. two-bed (3p) units and 183 no. two-bed (4p) units) in 8 no. five-nine storey blocks across two sites; 3 no. commercial; a crèche; a gym and 5 no. community rooms, along with landscaped courtyards, 92 no. car parking spaces (plus an additional 9 no. disabled spaces) provide in two basement car parks (one to each site); 418sqm of secure bicycle storage for residents; 160 no. visitor bicycle parking spaces; refuse stores, attenuation tanks, plant areas and all associated site development works.*

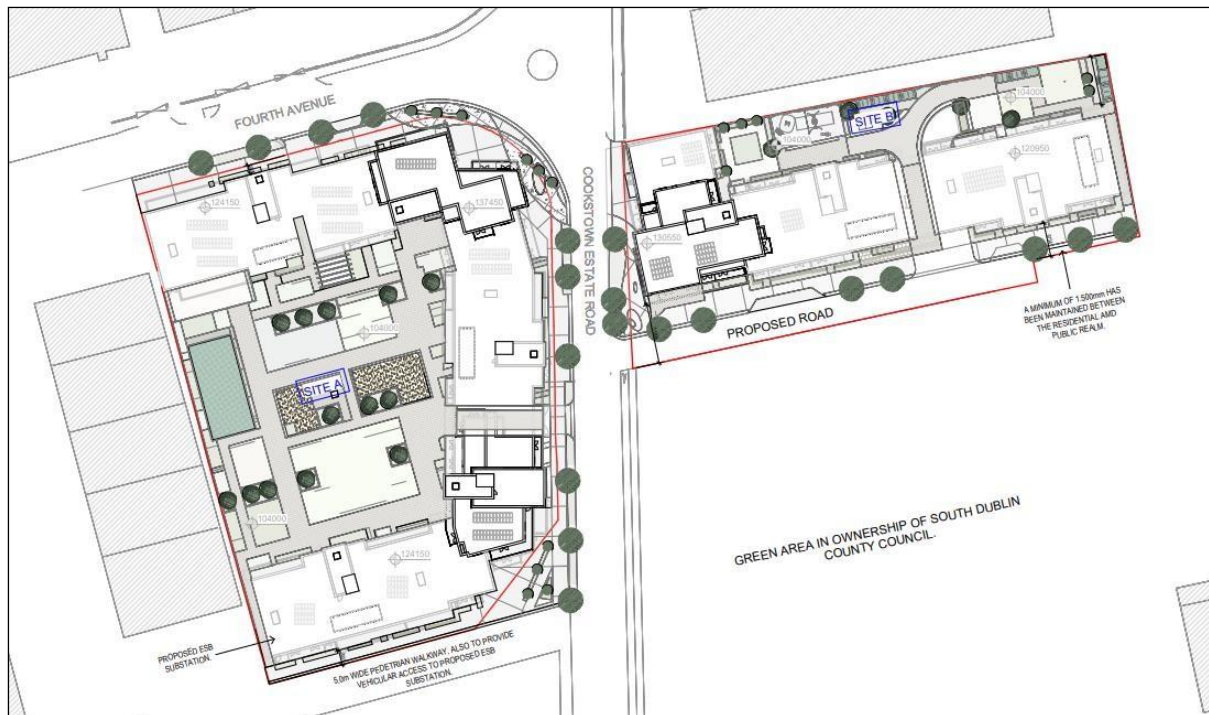


Figure 5.0 Proposed Site Plan proposed under Section 247 Meeting Ref. No. SHD1SPP012/18



Figure 6.0 Southern contextual elevation proposed under Section 247 Meeting Ref. No. SHD1SPP012/18



Figure 7.0 Northern contextual elevation proposed under Section 247 Meeting Ref. No. SHD1SPP012/18

More specifically, the proposal presented at the Section 247 Meeting Ref. No. SHD1SPP012/18:

- Involved two parcels of land (identified as Site A and Site B) totalling 1.15Ha. Site A comprised an area of approximately 0.71 ha (1.75 acres) and was located to the west of the junction of Fourth Avenue and Cookstown Road. Site B comprised an area of approximately 0.44 ha (1.08 acres) and is located to the east of the junction of Fourth Avenue and Cookstown Road;
- Comprised of a total of 336 no. residential apartments, made up of 62 no. studio units, 68 no. one-bed units, 23 no. two-bed (3p) units and 183 no. two-bed (4p) units, and featured 3 no. commercial units, a gym, a creche and a community room at ground floor level across the two sites;
- Varied in height from five-nine storeys; and
- Achieved a residential density of 292dpha.

In summary, the main conclusions from this meeting were as follows:

- South Dublin County Council were raised no issues with the type of residential development proposed, the mix of units proposed, the mixed-use components featuring at ground floor level, access arrangements to for Site A and the quality/positioning of the proposed open space.
- They raised concerns regarding the proposed height and recommended that the proposal either reflect:
  - i. The guiding principles and provisions of the recently expired Tallaght LAP in terms of building heights, provision of infrastructure, public lighting, landscaping & open space; or
  - ii. The provisions of a draft Tallaght LAP if at draft stage when lodged.
- They recommended that a minimum separation distance of 20-22 metres between the easternmost block on Site A and westernmost block on Site B be provided to create a quality public realm at ground floor level.
- With regards to access to Site B, they recommended that we liaise with Atlas GP Limited and try and tie in with their proposals at the Belgard Gardens Development, which sits immediately east and south-east of the subject site. As shown in the below plan excerpt, included in Figure 17.0 in Section 4.2, Phase 2 of Atlas GP Limited's Belgard Gardens Development included an east-west road centrally on the site, part of which immediately abuts Site B's southern boundary. It was suggested that this be considered in advancing the design for Site B of the subject proposal. The Applicant noted that re-designing the proposed access to Site B so that it lines up with Atlas GP Limited's proposal would involve the inclusion land owned by South Dublin County Council. In response to this, the applicable contact was advised by South Dublin County Council.

#### Meeting No. 2 (Ref. No. SHD1SPP021/18)

Date: 12<sup>th</sup> December 2018

Attendees: Jason Frehill - Senior Executive Planner, South Dublin County Council  
Deirdre Fallon – Executive Planner, South Dublin County Council

Adrian Barrett – Senior Executive Engineer, South Dublin County Council  
 Robert Roche – Assistant Engineer, South Dublin County Council  
 Edward Conroy - County Architect, South Dublin County Council  
 Willie Purcell - Senior Executive Engineer, South Dublin County Council  
 Arthur O'Brien - Lead Partner, C+W O'Brien Architects  
 Calogero Marino - BIM Manager & Senior Architectural Technologist, C+W O'Brien Architects  
 Daniela Sánchez - Architect, C+W O'Brien Architects  
 Margaret Commane – Senior Planner, Hughes Planning and Development Consultants  
 Eoin Reynolds – Director, NRB Consulting Engineers  
 Greg Daly - Director, GDCL Consulting Engineers  
 Lucy Carey - Principal Landscape Architect, Cunnane Stratton Reynolds  
 Simon Madigan - Assistant Landscape Architect, Cunnane Stratton Reynolds  
 Joseph Costello – Applicant Group  
 Karl Hannigan – Applicant Group

C+W O'Brien Architects and Hughes Planning and Development Consultant gave a presentation on the proposed development, including the site's planning history; the site context; and the zoning applying to and planning policy context for the subject site. This pre-planning meeting revolved around a pre-planning pack circulated prior to the meeting which proposed the following (as illustrated in Figures 8.0-11.0 (inclusive)):

*Demolition of the existing industrial units on the two sites and the construction of a new link road with Cookstown Road and a 'build-to-rent' housing development providing a total of 495 no. residential apartments (comprising 92 no. studio units, 111 no. one-bed units, 34 no. two-bed (3p) units and 258 no. two-bed (4p) units) in 8 no. eight to eleven storey blocks across two sites; 3 no. commercial units; a crèche; a gym, 2 no. community rooms and 2 no. communal amenity spaces, along with landscaped courtyards, 136 no. car parking spaces (plus an additional 144 no. disabled spaces) provide in two basement car parks (one to each site); 791 no. secure bicycle parking spaces for residents; 147 no. visitor bicycle parking spaces; refuse stores, attenuation tanks, plant areas and all associated site development works.*

More specifically, the proposal presented at the Section 247 Meeting Ref. No. SHD1SPP021/18:

- Involved two parcels of land (identified as Site A and Site B) totalling 1.32Ha. Site A comprised an area of approximately 0.71Ha and was located to the west of the junction of Fourth Avenue and Cookstown Road. Site B comprised an area of approximately 0.61Ha and is located to the east of the junction of Fourth Avenue and Cookstown Road. Site B included a 0.17Ha area of land owned by South Dublin County Council (the site boundary having been extended to facilitate the provision of an access road to Site B which lined up with that proposed in Phase 2 of Atlas GP Limited's Belgard Gardens Development immediately east);
- Comprised of a total of 495 no. residential apartments, made up of 92 no. studio units, 111 no. one-bed units, 34 no. two-bed (3p) units and 258 no. two-bed (4p) units, and featured 3 no. commercial units, a gym, a crèche and 2 no. community room at ground floor level across the two sites;
- Varied in height from eight to eleven storey (the increase in height from the proposal under Section 247 Meeting Ref. No. SHD1SPP012/18 occurring in response to the introduction of the Urban Development and Building Heights Guidelines for Planning Authorities, 2018, which encourages the intensification of development and increase in building heights in suitable locations well served by public transport); and
- Achieved a residential density of 367dpha.



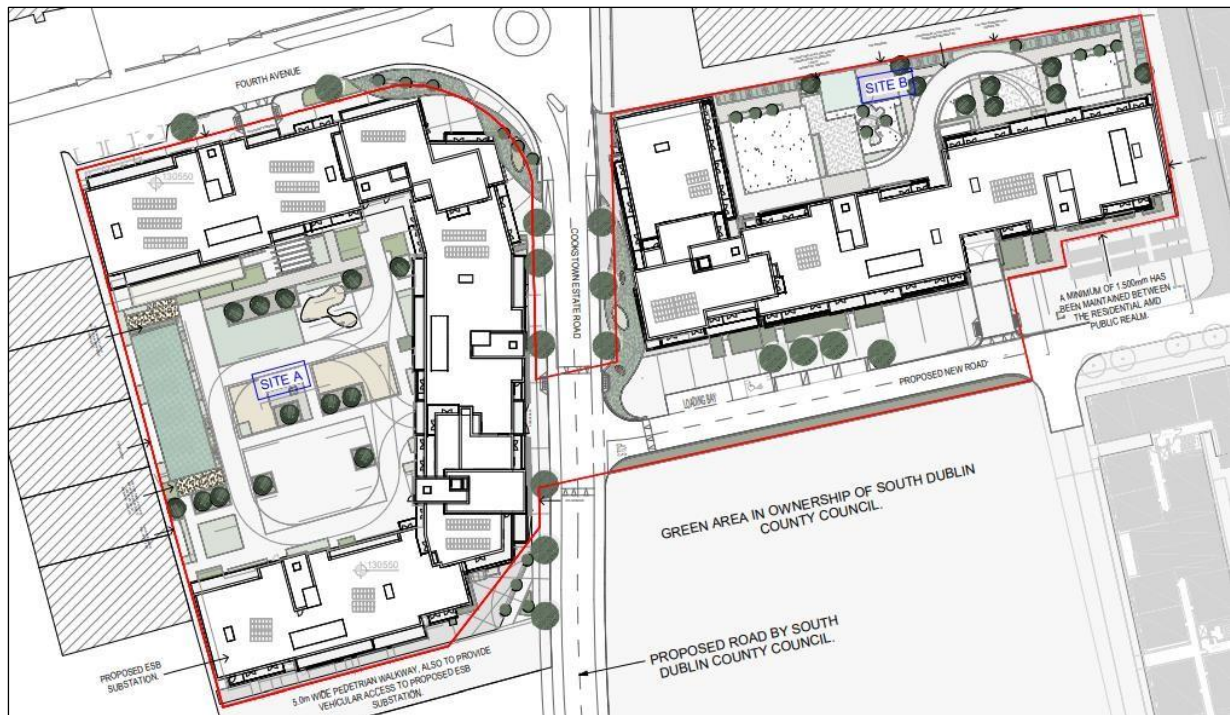


Figure 8.0 Site Plan proposed under Section 247 Meeting Ref. No. SHD1SPP021/18

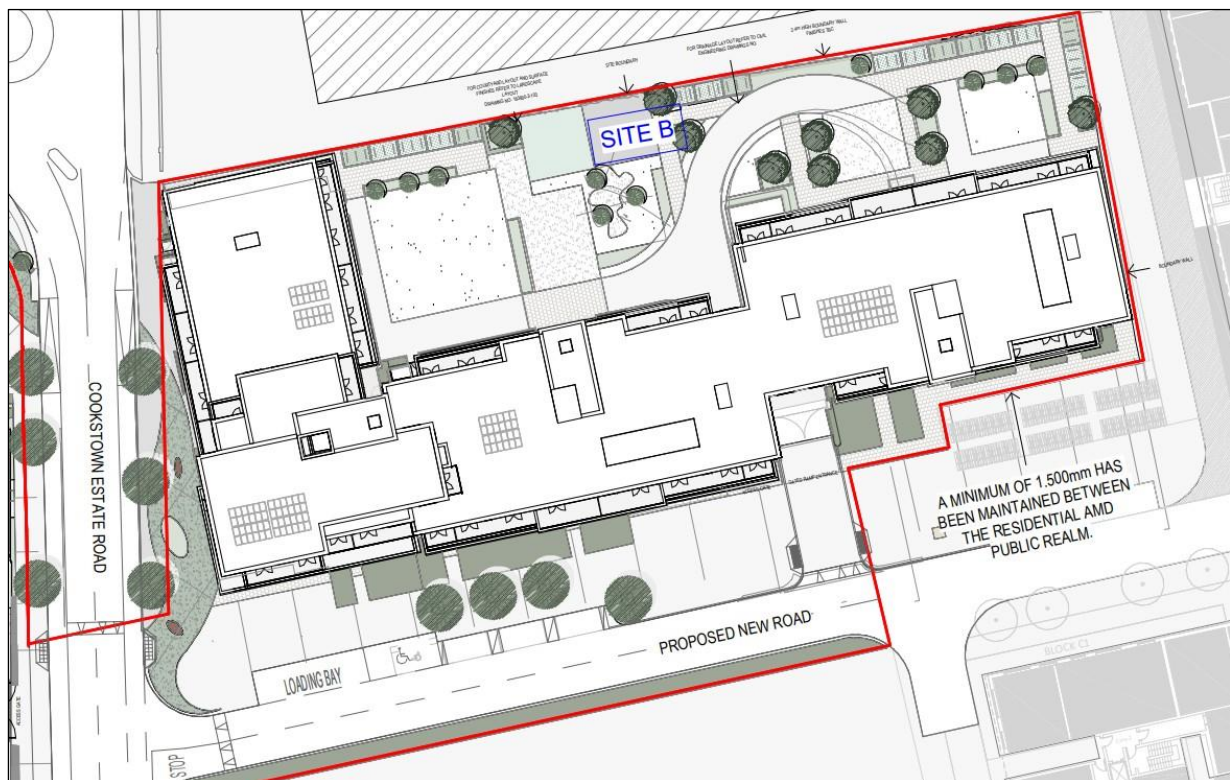


Figure 9.0 Site Plan for Site B proposed under Section 247 Meeting Ref. No. SHD1SPP021/18)





Figure 10.0 Southern contextual elevation proposed under Section 247 Meeting Ref. No. SHD1SPP021/18



Figure 11.0 Northern contextual elevation proposed under Section 247 Meeting Ref. No. SHD1SPP021/18

In summary, the main conclusion from this meeting was as follows:

- South Dublin County Council advised that they considered the proposal to be premature in the absence of a broader road network strategy being developed for the broader Cookstown Industrial Estate area which considered all developments currently being put forward within the area. They advised that the strategic direction regarding road provision in this area was currently focusing on the provision of an east-west link road from the intersection of Belgard Road/Airton Road and Cookstown Road (further north of the subject site) and that an east-west link road to the south of Site B would not be looked favourably upon at this time.

In light of the above, the pre-planning application material pertaining to Ref. No. SHD1SPP012/18 formed the basis of the pre-application consultation submission submitted to An Bord Pleanála.

### 3.1 Consultation with An Bord Pleanála

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 26<sup>th</sup> June 2019.

An Bord Pleanála subsequently issued a notice of Pre-Application Consultation Opinion on 11<sup>th</sup> July 2019, which identified 6 no. items to be addressed, in order for the application to constitute the reasonable basis for a Strategic Housing Application. These 6 no. items were as follows:

#### 1. Height, Density and Unit Mix

*Further consideration of the document as they relate to height and residential density. In this regard, a planning rationale/justification for the height and residential density proposed should be submitted which has due regard to inter alia, the local and national planning policy context. Specifically, the prospective applicant must be absolutely satisfied that the development would not conflict with emerging local policy guidelines in terms of any proposed Local Area Plan. The prospective applicant should also provide a reasoned rationale for the proposed building height, taking into account the pattern of existing and permitted residential developments in the area and the zoning*

*objective and permitted densities pertaining to such lands and how the proposed development of the scale proposed would be successfully assimilated into the area, now and in the future.*

*A planning rationale/justification for the proposed unit type/mix should be submitted which includes a housing assessment report that considered existing and recently permitted developments in the Tallaght area including tenure, unit type and mix. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.*

## **2. Roads**

*Further consideration of the documents as they relate to planned roads improvements in the area. Specifically prospective applicant is advised to illustrate all new and planned road infrastructure as it relates to both subject sites (A and B) and how the proposed development will integrate and/or facilitate these proposals. The prospective applicant should be satisfied that the proposed development is not premature pending the delivery of such road infrastructure. The prospective applicant should demonstrate that the proposed development would not prejudice any stated objectives of the planning authority to deliver new roads and increase the prospect of vehicular connections to and from Cookstown, Airton Road and Belgard Square North or limit the possibility of land acquisition for proposals led by the Local Authority. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.*

## **3. Site Integration**

*The pre-application consultation documentation has failed to provide an adequate amount of material to allow any meaningful assessment of site integration if submitted as a full planning application. No documentation has demonstrated how the development will successfully integrate with the character and amenities of the area, such as they are, or recently permitted development to the east. Further consideration should be given in relation to the design rationale/justification outlined in the documents as it relates to the integration of the proposed development with adjacent permitted and emerging development. Layout drawings should show recently permitted development to the east in the context ABP-303306-18 regarding the provision of a future vehicular and/or pedestrian route, position of apartment buildings and open space. In addition, contiguous elevations, levels and cross sections should show permitted development on those lands to the east. There should be a logical physical connectivity between the site and the site to the east, as a means of providing a usable pedestrian/cyclist route. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted.*

## **4. Residential Amenity**

*Further consideration and/or justification of the documents as they relate to the internal layout of the proposed development, having regard to the provision of resident support facilities and amenities and their location within the overall development, having regard to the provision of the Sustainable Urban Housing: Design Standards for New Apartments, 2018 including the specific planning policy requirements in respect of Build-to-Rent and Shared Accommodation developments. The provision of a variety of facilities should contribute to the creation of a shared environment where individual renters become more integrated and develop a sense of belonging with their neighbours in the scheme. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.*

## **5. Materials and Finishes**

*Further consideration of the documents as they relate to the detailed design of the proposed development. The documentation submitted at application stage should*

*demonstrate that the external finishes, materials and detailing of the proposed buildings together with landscaping and surface/boundary treatments of the outdoor spaces would be of a sufficient quality to ensure that the proposed development makes a positive contribution to the character the area over the long term. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.*

## **6. Public and Communal Open Space**

*Further consideration should be given to the design rationale/justification outlined in the documents as it relates to the qualitative standards of public and communal open space provisions particularly in the context of the disposition and usability of such spaces. Details of usability and hierarchy of such spaces, ease of access and consideration of any impact in terms of overlooking issues that may arise to units at ground floor level should be considered. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted. A site layout plan which clearly distinguishes between public open space and communal open space should be submitted. Any proposed pedestrian connections to adjoining lands should be clearly indicated on plans. The prospective applicant should include any plans for public open spaces in the wider area, if know, and how such proposals would link in and integrate with the proposed development. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.*

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. Photomontages and cross sections at appropriate intervals for the proposed development including how the development will interface with existing streets and contiguous lands. In this regard, due consideration should also be given to recently permitted residential and road development not yet constructed.*
- 2. Daylight/Sunlight analysis, showing an acceptable level of residential amenity for future occupiers of the proposed development, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development.*
- 3. A revised Traffic Impact Assessment report which addresses concerns raised by the planning authority regarding inter alia, access to car parks, roads layout, public transport capacity, car parking rationale and planned roads. A rationale justifying any reduction in car parking spaces should also be submitted in the context of the Sustainable Urban Housing guidelines and advice on Build to Rent schemes.*
- 4. Additional water and waste water details to address matters raised in the planning authority's opinion dated 6 June 2019 in particular the Water Services Department's comments and consideration of the provisions of appropriate SuDS measures and attenuation calculations.*
- 5. Construction and Demolition Waste Management Plan.*
- 6. 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 in use as Build to Rent accommodation. There shall be 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 residents units are sold or rented separately for that period (Your attention is drawn to the provisions of Specific Planning Policy Requirement 7 of the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2018).*



7. *The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.*

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.

One amendment of particular note is the omission of Units 69 & 70 Cookstown Road (identified at Site B in pre-planning correspondence) from the subject application. Following the feedback received at pre-planning consultation with An Board Pleanála, it was decided that the development of Units 69 & 70 Cookstown Road would be premature pending the provision of the Airtón Link Road. Therefore, it has been amended from the subject application and will instead form the basis of a subsequent application. The child care previously proposed on Site A (the subject site) will be provided as part of the later planning application for Site B which is considered appropriate given the small scale of the subject development.

#### 4.0 Site 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 the South Dublin County Council planning register revealed no planning applications relating specifically to the envelope involved in the subject proposal. However, we note that a review of the South Dublin County Council planning register revealed that the subject sites formed part of a larger land parcel involved in the following planning application previously:

**Reg. Ref. SD16A/0270** Permission was refused by South Dublin County Council on 14<sup>th</sup> September 2016 for the construction of a mixed residential and commercial development (GFA 38,207.1sq.m) providing a total of 246 apartments in 2 separate buildings, 3 commercial units, 2 community rooms, 2 crèches and 2 ESB substations, along with landscaped courtyards (containing a surface bicycle store to each site), underground car parking, providing an overall total of 233 parking spaces, refuse stores and plant areas. Site A with frontages to Fourth Avenue and Cookstown Road comprises a total of 148 apartments (14 studios, 27 one bed, 95 two bed and 12 three bed), all with private balcony spaces in a building with a maximum height of 7 stories. (Total GFA of 23,483.4m<sup>2</sup>). 2 commercial units of 333m<sup>2</sup> and 197m<sup>2</sup>, 1 community room of 44.8m<sup>2</sup> and 1 crèche of 194.6m<sup>2</sup> with dedicated open space, are proposed at ground floor level. An ESB substation is proposed at ground floor level to service site A. The landscaped courtyard contains bicycle store for 44 bicycles. An underground carpark serviced off Fourth Avenue, contains 148 car parking spaces (of which 19 are disabled) and refuse stores. Site B with a frontage to Cookstown Road comprises a total of 98 apartments (10 studios, 26 one bed, 54 two bed and 8 three bed) all with private balcony spaces in a building with a maximum height of 7 stories (total GFA of 14,723.7m<sup>2</sup>). 1 community room of 29.8m<sup>2</sup> and 1 crèche of 147m<sup>2</sup> with dedicated open space, are proposed at ground floor level. An ESB substation is proposed at ground floor level to service Site B. The landscaped courtyard contains bicycle store for 94 bicycles. An underground carpark serviced off Cookstown Road contains 85 carparking (of which 13 are disabled) spaces and refuse stores. Proposals also included the provision of a new road linking the existing Cookstown Road to Belgard Square North, a new road to Southern boundary of Unit 69, a new pedestrian walkway to the Southern boundary of Units 66 and 67, (which will also allow for the servicing of the proposed ESB substation for Site A) and the provision of a new public park (0.7175ha). The development also includes the demolition of all existing industrial units and all associated site development works.

In this instance the application was refused permission for a number of reasons, as follows:

1. *Site 'A' road frontage is limited to less than 50% of the site perimeter. On Site B, this frontage is reduced to below 20%. The proposed sites are, as a result, severely compromised by their size and absence of accessible frontage. Having regard to the provisions of the South Dublin County Development Plan 2016-2022 and the Tallaght Local Area Plan (LAP) 2006 (as extended), with particular reference to the proposed layout and to the height and scale of the proposed development, the proposed development would constitute overdevelopment of the site, resulting in a substandard form of development. Thus, the proposed development would seriously injure the amenities of property in the vicinity and those of future occupants in the proposed apartments. The proposed development, would therefore be contrary to the proper planning and sustainable development of the area.*
2. *The applicant/developer has failed to demonstrate sufficient legal interest in the lands proposed to be utilised to access the site from Belgard Square North. The access arrangement at this location is unacceptable, given its close proximity to the existing entrance to Exchange Hall. In addition, the applicant/developer has failed to provide sufficient information to demonstrate that the proposed development would not seriously prejudice the safe and efficient movement of traffic and endanger public safety by reason of traffic hazard. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.*
3. *The proposed development would compromise the future orderly development of adjoining sites in line with the Council Masterplan/Local Area Plan 2006 '(as extended)' and would also therefore be contrary to the proper planning and sustainable development of the area.*
4. *A significant number of the proposed apartments would, excluding built in bedroom storage presses, fail to meet the Sustainable 'Urban Housing: Design Standards Apartments Guidelines for Planning Authorities, Department of the Environment, Community and Local Government (2015), floorspace standards as set out in the in terms of Storage. Some 2- bedroom apartments would also fail to meet 'the standard on aggregate floor areas; for bedrooms. The proposed development would therefore fail to provide an acceptable standard of residential amenity and would be contrary to the apartment guidelines.*

The site layout plans and elevations forming the basis for this decision are included in Figures 12.0 to 16.0 (inclusive) overleaf. This application has been considered when preparing the subject proposal.

The abovementioned application has been considered in preparing the subject proposal.



Figure 12.0 Site layout plan showing the mixed residential and commercial development refused permission for the application under Reg. Ref. SD16A/0270



Figure 13.0 Contextual elevation of the development proposed under Reg. Ref. SD16A/0270 as viewed from Cookstown Road looking east





Figure 14.0 Contextual elevation of the northern interface of the development proposed under Reg. Ref. SD16A/0270



Figure 15.0 Contextual elevation of the southern interface of the development proposed under Reg. Ref. SD16A/0270



Figure 16.0 Contextual elevation of the development proposed under Reg. Ref. SD16A/0270 as viewed from Cookstown Road looking west

## 4.2 Planning History of the Adjoining Land

A review of the South Dublin County Council planning register and An Bord Pleanála's planning register revealed the following applications on the land surrounding the subject site.

### ***Belgard Square North/Cookstown Industrial Estate, Tallaght, Dublin 24 (immediately abutting subject site)***

**Reg. Ref. SD178/0007** South Dublin County Council have made an application under Part 8, Article 81 of the Planning and Development Regulations, 2001 (as Amended), for the: (1) Provision of a direct road link between Belgard Square North and the Cookstown Road. (2) A new signalised junction where the new Cookstown Link Road connects to the Belgard Square North. (3) Improvements to pathways, cycleways, crossings and improvements to the quality of the public realm locally. (4) Upgraded public lighting.

This road is currently under construction. It is worth noting that the proposed development on the subject site provides vehicular access off the Cookstown Road extension and ties in with the associated footpaths and cycleways.

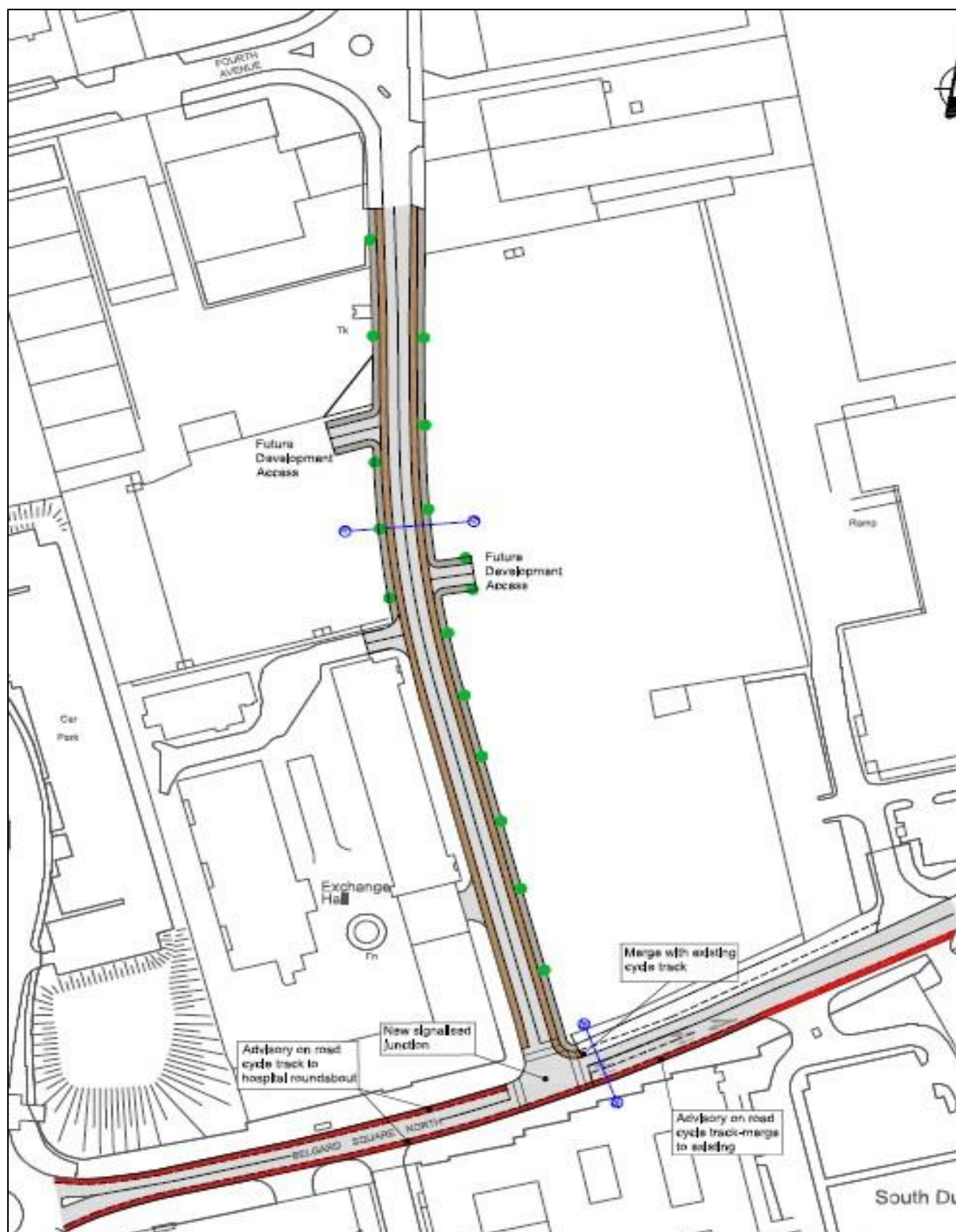


Figure 17.0 Plan illustrating new road and associated junction/public realm improvements proposed under Reg. Ref. SD178/0007 (stars used to identify subject site)



***Belgard Gardens, Belgard Square North and Belgard Road, Tallaght, Dublin 24 (south-east of the subject site)***

**ABP Case No. 303306** Permission was granted by An Bord Pleanála on 15<sup>th</sup> 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 18.0 Site layout plan of development approved under An Bord Pleanála Case No. 303306 including the second phase of development which is to follow





Figure 19.0 Site layout plan of development approved under An Bord Pleanála Case No. 303306

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 LAP 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.

## **5.0 Proposed Development**

The proposed development comprises the demolition of the existing low-rise industrial units (2,518sq.m) and construction of a 'build-to-rent' housing development, accommodating a total of 245 no. residential apartments, in a six to eleven storey building over basement. The proposed development will be of modular construction. The proposed scheme has a housing density of 345 dwellings per Ha, a plot ratio of 3.1 and a site coverage of 43%.

More specifically, the 'build-to-rent' housing development will comprise 69 no. studio units, 56 no. one-bed units and 120 no. two-bed units. 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 features a minimum of 1 no. communal amenity space per floor level. These communal amenity spaces will accommodate hot desk rooms, cinema rooms and multi-purpose spaces.

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) are also proposed at ground floor level, one in the north-eastern corner and one in the south-eastern corner more specifically.

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). The development is served by 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).

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 refer to the Design Statement and architectural drawing set, prepared by C+W O'Brien Architects, for further details regarding the above. It is worth noting that the proposed development has been designed having regard to the approach surfaces relating to Casement Aerodrome and the subject site's proximity to the helipad at Tallaght Hospital. This is illustrated in the Aeronautical Assessment Report, prepared by O' Dwyer & Jones Design Partnership Aviation Planning and Architecture Consultants, and Solar Photovoltaic Glint & Glare Study Aviation Specific, prepared by Innovision, which accompany this application.

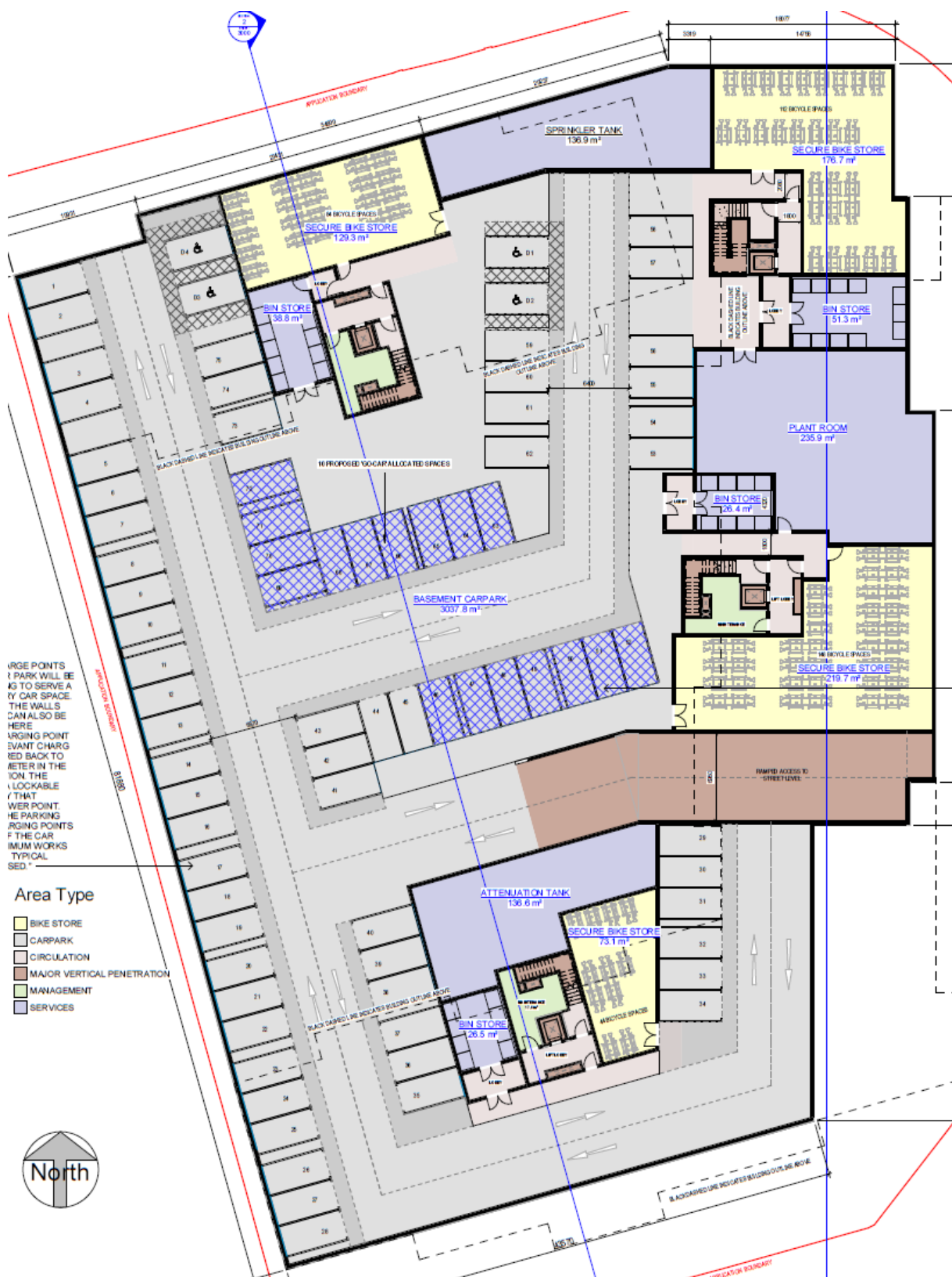


Figure 20.0 Basement plan of the proposed development



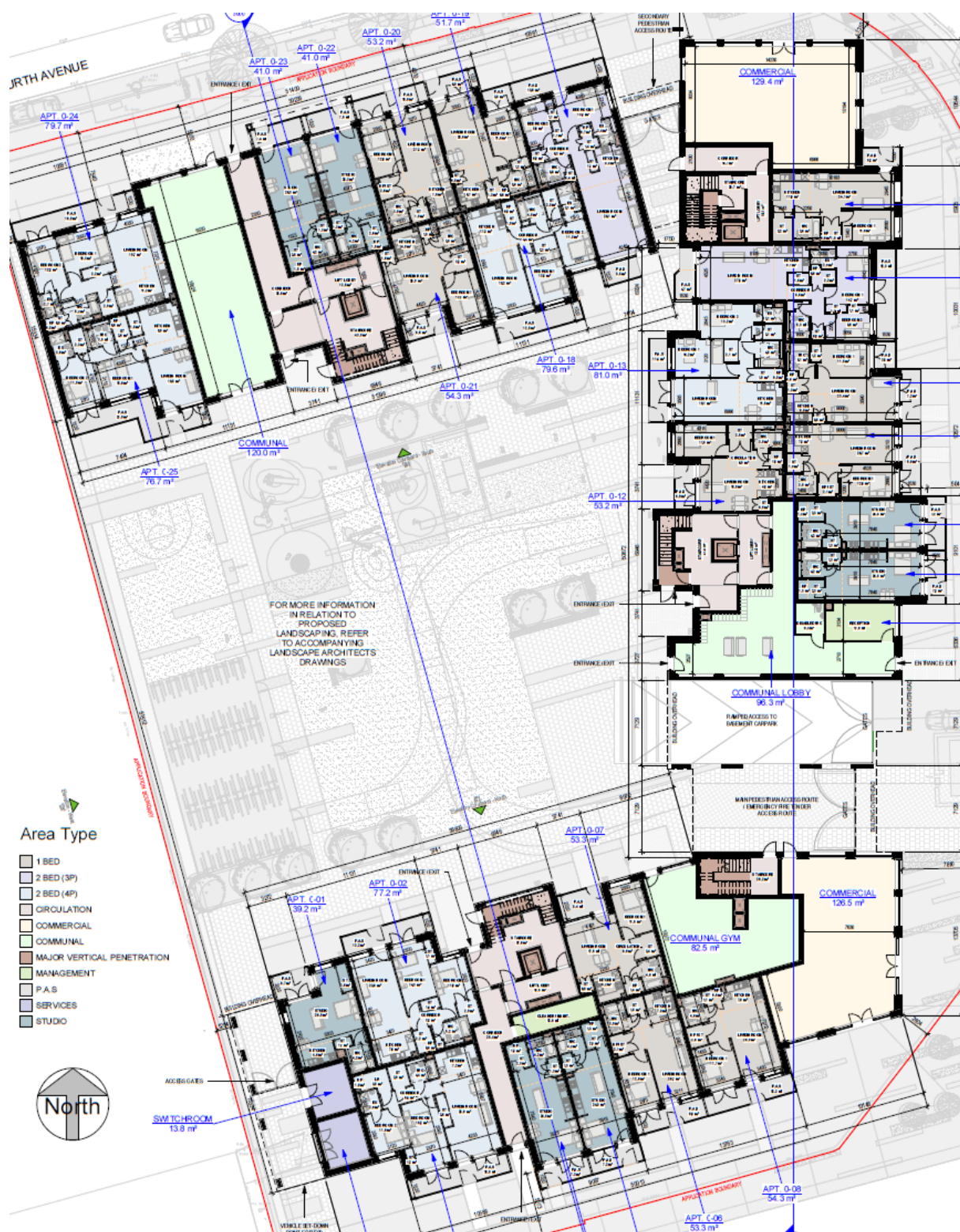


Figure 21.0 Ground floor plan of the proposed development

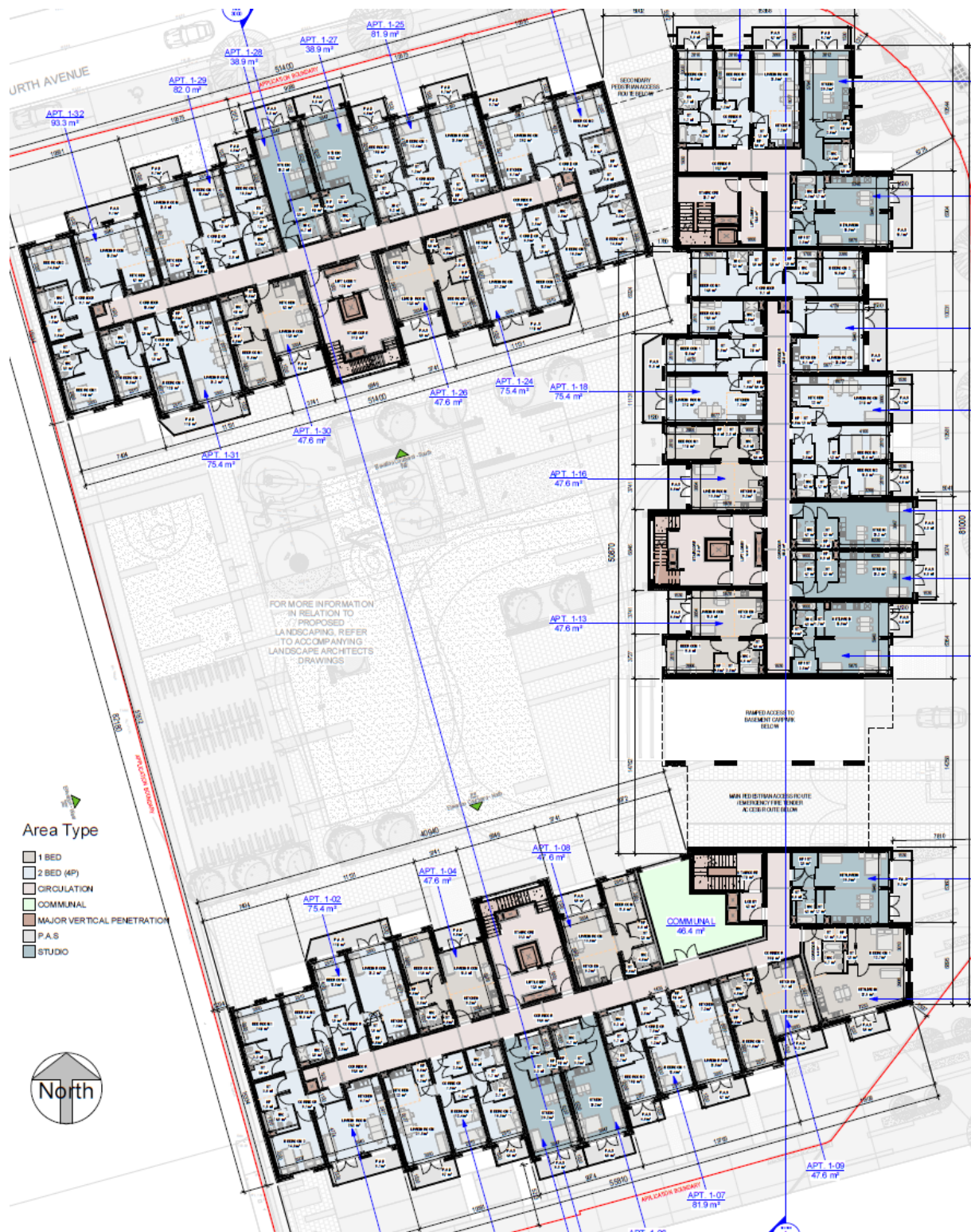


Figure 22.0 First floor plan of the proposed development





Figure 23.0 Second floor plan of the proposed development





Figure 24.0 Third floor plan of the proposed development



Figure 25.0 Fourth floor plan of the proposed development



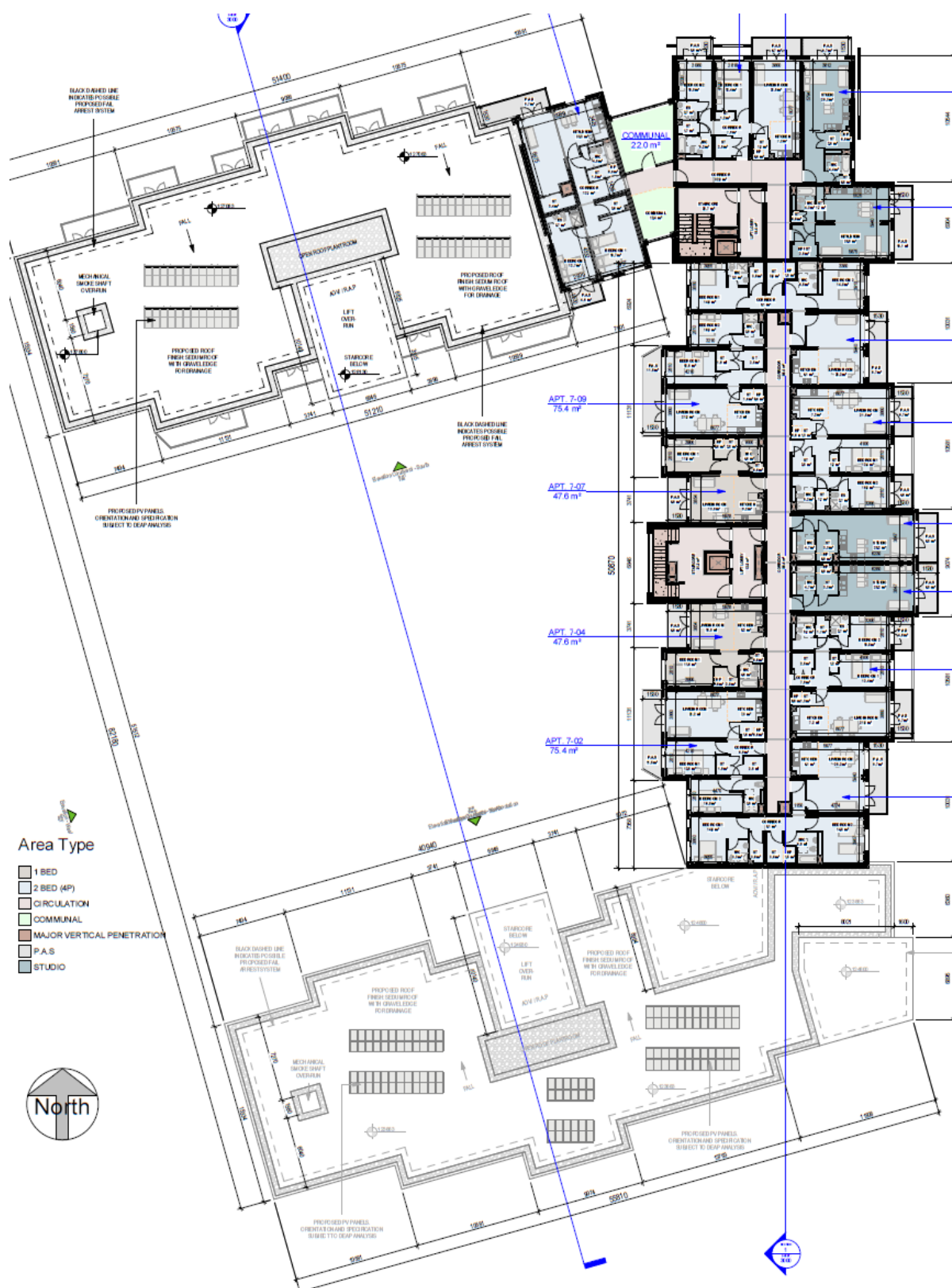


Figure 26.0 Fifth floor plan of the proposed development





Figure 27.0 Sixth floor plan of the proposed development



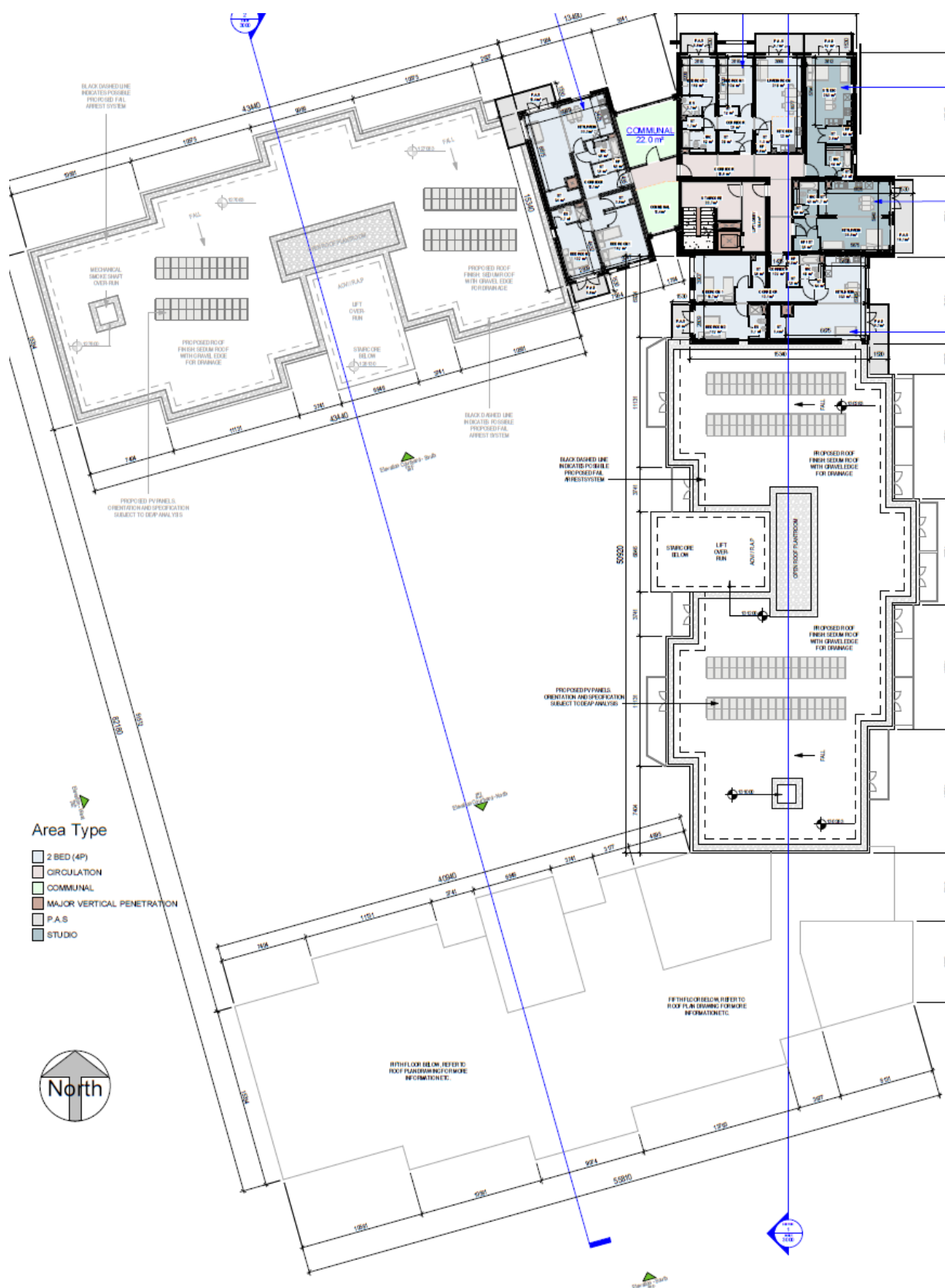


Figure 29.0 Eighth floor plan of the proposed development



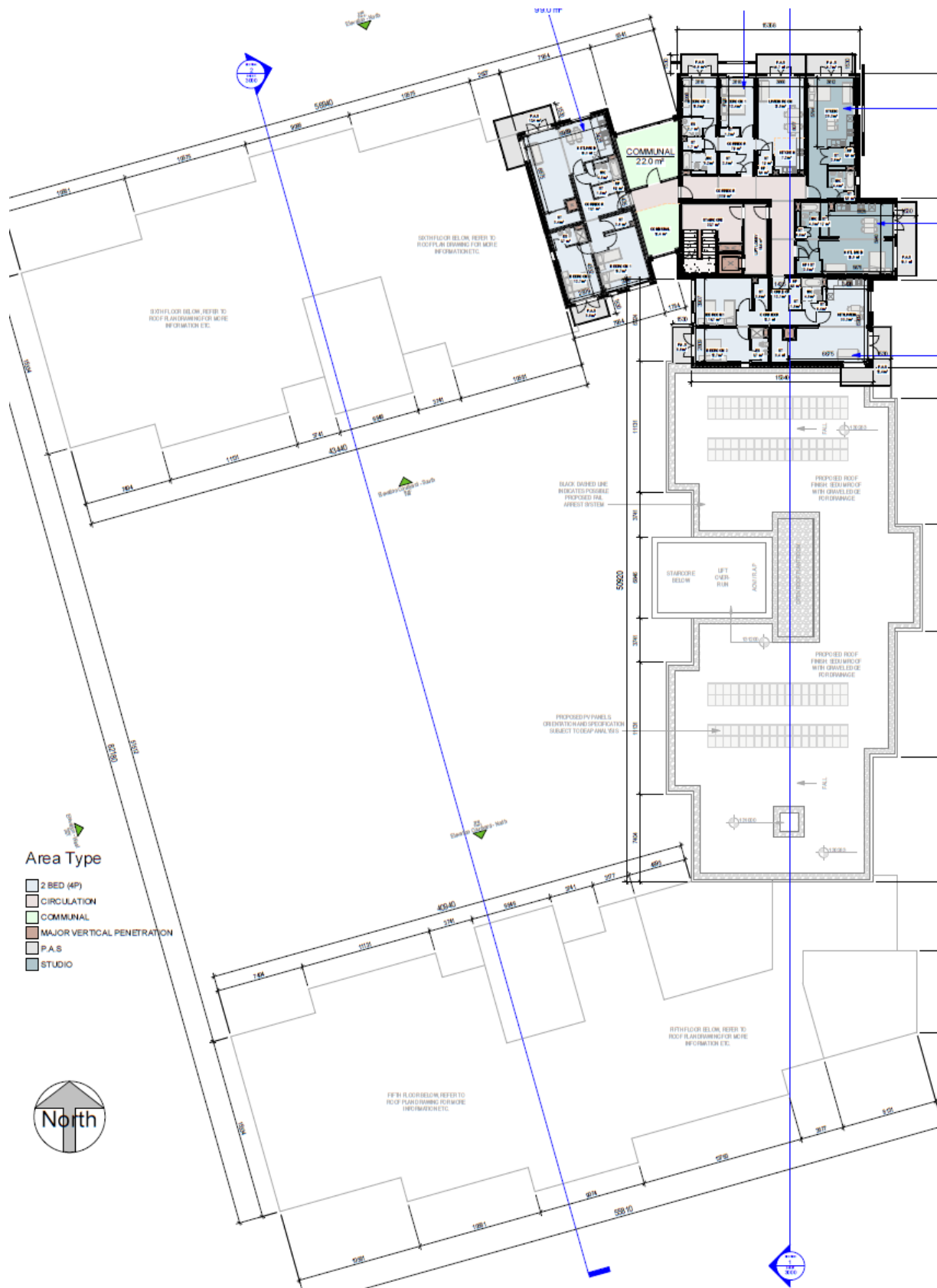


Figure 30.0 Ninth floor plan of the proposed development

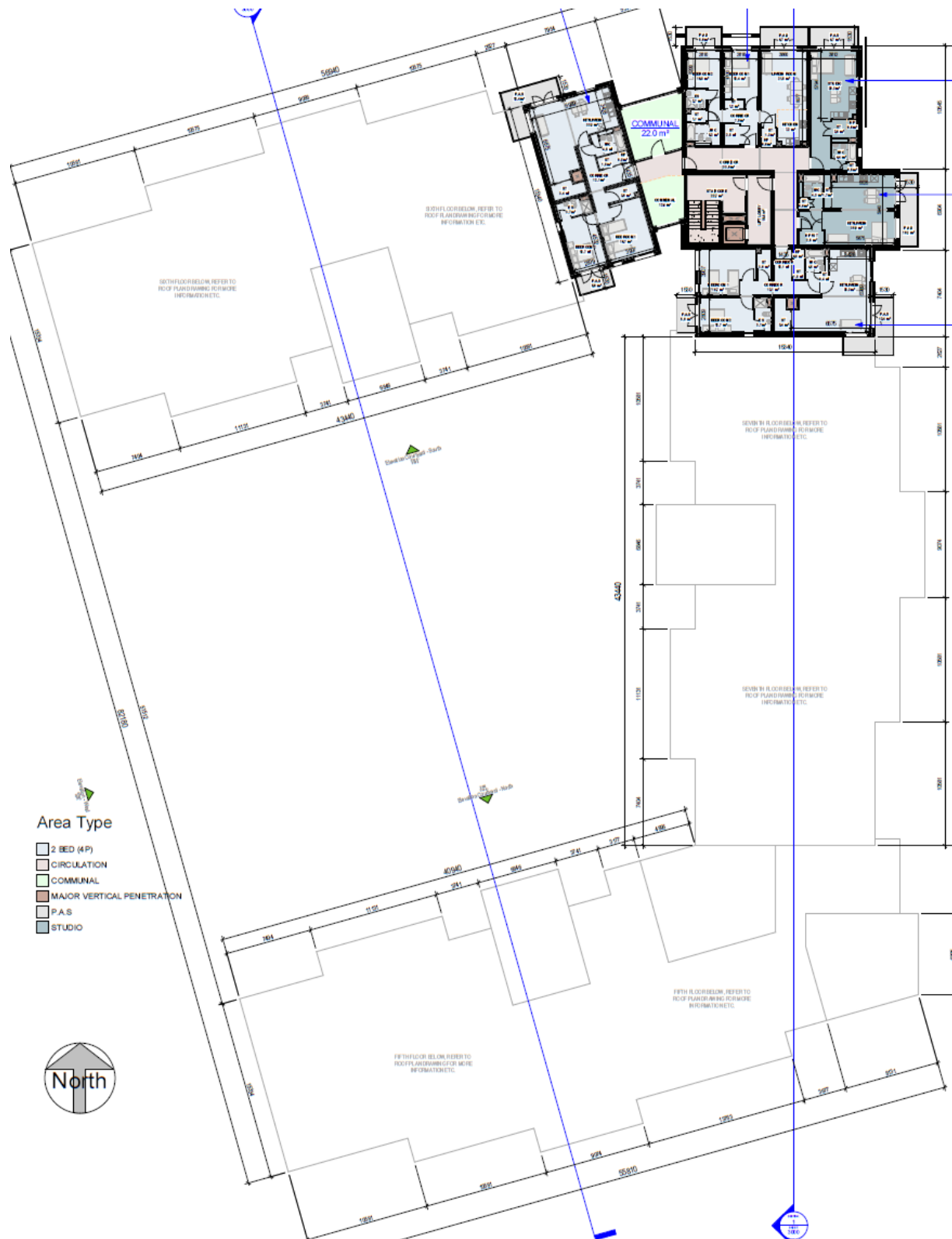


Figure 31.0 Tenth floor plan of the proposed development



Figure 32.0 Contextual elevation of the eastern interface of the proposed development



Figure 33.0 Contextual elevation of the northern interface of the proposed development

As discussed in Section 2.0 and 3.0, at pre-planning stage it was intended to include Units 69 & 70 Cookstown Road (referred to as Site B in pre-planning correspondence) in this application. However, following the feedback received at pre-planning consultation with An Bord Pleanála, it was decided that the development of Units 69 & 70 Cookstown Road would be premature pending the provision of the Airton Link Road. This site will instead form a later phase of development and a separate planning application will be lodged.

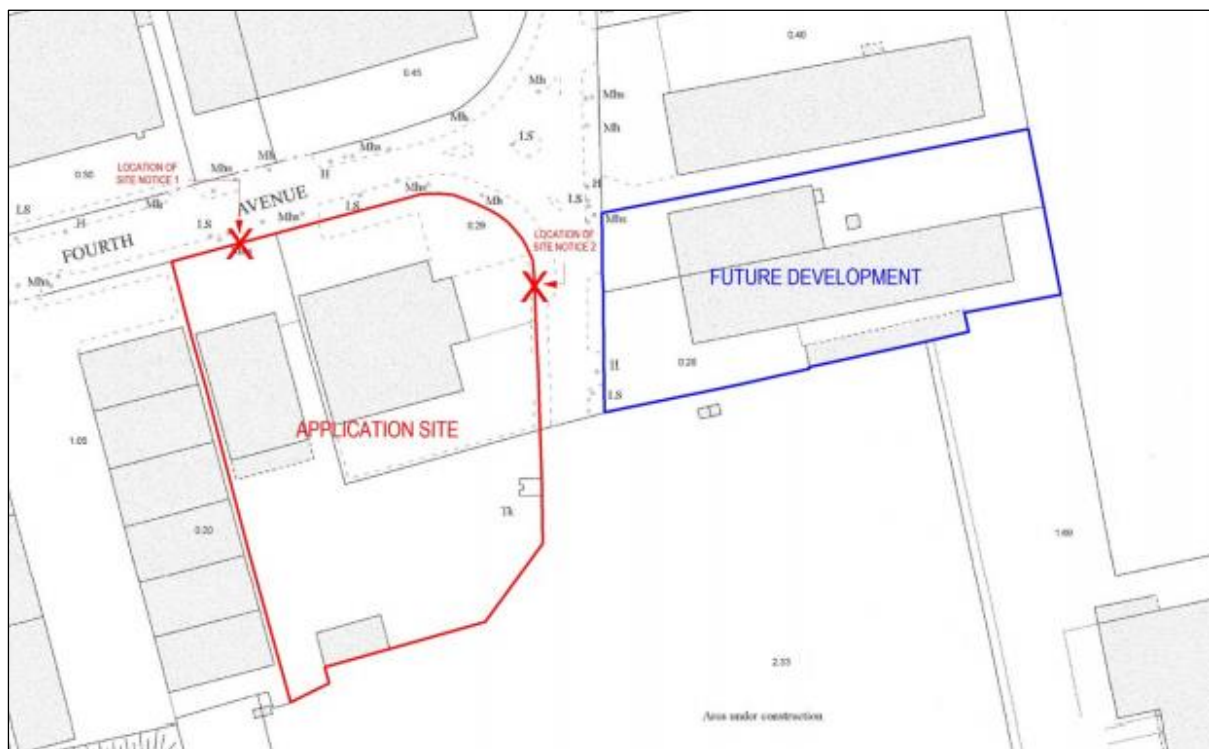


Figure 34.0 Map illustrating subject application site and site earmarked for Phase 2 of development



## 6.0 Planning Assessment

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
- Proposed Draft 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:

<b>National Policy Obj. 3a</b>	Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
<b>National Policy Obj. 3b</b>	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.
<b>National Policy Obj. 13</b>	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. TU Tallaght is identified as one of the former 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 and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical*

*limitations on building height.*

The proposed height and density are consistent with the above guidance due to 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 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;
- Maximises access to natural daylight, ventilation and views due to the positioning of the blocks on along the northern, southern and eastern perimeter; and
- Has limited impact in relation to overshadowing and loss of light due to its separation from existing residential developments in the surrounding area.

**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 is located within 500 metres of the Tallaght town centre which features several local amenities such as shops, restaurants, entertainment venues etc. Furthermore, the site is also situated in close proximity to the Tallaght Hospital 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, featuring a gym, communal amenity spaces across all levels of the development and a landscaped courtyard at ground floor level.



## **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 Forth Avenue, in accordance with the South Dublin County Development Plan 2016-2022 and the Draft 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 in close proximity to the Tallaght Hospital Luas stop and Bus Routes serving Belgard Road and Belgard Square North. Also, the provision of 388 no. resident bicycle parking spaces, as well as visitor 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 'build-to-rent' development will accommodate a diverse mix of residents; workers in the nearby hospital and I.T., workers within the broader area and students attending the nearby hospital and I.T. as well as colleges and universities in the broader area. In terms of layout, the provision of communal facilities, including communal amenity space, laundry rooms, gym and open space areas at ground and basement floor level 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 a gym, communal amenity room and communal lobby opening onto Cookstown Road and Forth Avenue 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 Forth Avenue which will create a distinct sense of place when travelling northwards on the road to be introduced between Belgard Square North and Cookstown Road.
- The proposed design provides for a high-quality development of 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 buildings will have a prominent position on the junction of Cookstown Road and Forth Avenue and adjacent to the new road from Belgard Square North which is currently under construction. The building is designed to have active frontages along both Cookstown Road and Forth Avenue providing 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 Draft 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 and its design is consistent with current increased density, intensification of use and significant increase in heights encouraged by the National Planning Framework and the Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018.

This new building will exert its own streetscape presence on Cookstown Road and Forth Avenue. It will generate activity at street level along both frontages due to the commercial uses and communal facilities proposed as well as due to the 'own door access' apartments and street furniture/landscaping proposed along Cookstown Road and Forth Avenue. Both the 'build- to-rent' accommodation use and the proposed commercial/community uses will enliven the neighbourhood and bring additional footfall to the area.

*(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 the Cookstown Road extension which links 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 in close proximity to the Tallaght Hospital Luas stop and a number of bus services run along Belgard Square, c. 200 metres south of the subject site, offering access to and from the city.

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 Fourth Avenue and Cookstown Road. The development will benefit residents in the neighbourhood by the widening and improving the public realm. People will find Fourth Avenue and Cookstown Road a 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 units and gym and creche open up the site providing animation to passers-by through its openness at ground floor level. The own door accesses provided to ground floor apartments also improves animation. Extensive glazing along the street facades at ground floor level and pedestrian entries afford views into the various parts of the building and into the internal courtyard.

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

The proposed development features 'build-to-rent' accommodation and 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 commercial units and other communal spaces along Cookstown Road and Fourth Avenue, as well as landscaping and seating areas along the street frontages. 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 Draft Tallaght Town Centre Local Area

Plan 2020-2026 seek to encourage higher densities at this location. Currently on the site are a series of low-rise industrial buildings. The construction of new residential buildings 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 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 courtyard, 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 buildings, thereby offering units which are outward looking, with varied aspects.

*(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 at the intersection of Cookstown Road and Fourth Avenue will have a strong identity and become a distinctive and recognisable place. The proposed buildings adopt setbacks from the site's street frontages to create landscaping and seating areas along the street and frontages.

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

The layouts of the proposed buildings respond 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 Fourth Avenue. Commercial units and communal amenity spaces are also proposed along these street frontages. This will create additional activity, footfall and animation to both of these streets.

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

The scheme has been designed with landscaping and street furniture along the Cookstown Road and Fourth Avenue frontages. A large central courtyard is provided which is interfaced with a number of units in the apartment building and a gym, and communal amenity spaces serving the development are also provided 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 a generously proportioned walkway.

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

Adaptability of the design has been considered and it is proposed that the building be of modular construction, 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 build-to-rent 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.

The majority of proposed units enjoy dual or triple aspect and all have their living/kitchen spaces on the outer elevations of the building or fronting the central courtyard. 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 a large central courtyard which features a mix of hard and soft landscaping and amenity spaces, including a children's playground.



The location of the development means that there is no direct overlooking of any other residential properties, with the buildings surrounding the subject site comprising non-residential buildings.

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

The development is provided with 75 no. on-site car parking spaces, 10 no. of which will be allocated for Go-Car vehicles, plus an additional 4 no. limited mobility spaces, which is considered appropriate given the sites proximity to the Luas and numerous bus/cycle routes. These car parking spaces, as well as the 388 no. resident bicycle spaces proposed, will be accommodated centrally on the site at basement level of the building. Vehicular and resident bicycle parking access will be via a secure gate located in the south-eastern corner of the site. 72 no. visitor bicycle parking spaces will be located within the central courtyard provided to the proposed development, accessible via one of 3 no. secure access gates, and along the street frontage.

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

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.

## **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. Further to this, the development has been designed to include resident support facilities and resident services and amenities, including 21 no. communal amenity spaces (totalling 880sqm), including a communal gym (82.5sqm), a communal lobby/reception area, hot desk rooms and multi-purpose spaces, and a ground floor level landscaped courtyard with a playground, play spaces and seating areas.

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

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 245 no. apartment units, of which 69 no. are studio apartments, 56 no. one bedroom units, and 120 no. 2 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 set out in the guidelines for new apartments.

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

The proposed development is generally compliant with the minimum aggregate floor areas and minimum widths for living/dining/kitchen areas, as shown in the table overleaf. The slight variations proposed in relation to the widths and floor areas proposed for Apartment Types 3, 4, 5 and 7 are allowable as it falls below 5% and these apartment types achieve overall compliance with the required minimum overall apartment floor areas.

<b>Minimum Aggregate Floor Areas and Minimum Widths - Living/Dining/Kitchen Areas</b>				
<b>Unit Type</b>	<b>Minimum Width Required</b>	<b>Minimum Width Proposed</b>	<b>Minimum Aggregate Floor Area Required</b>	<b>Floor Areas Proposed</b>
Studio	4m	3.812-5.94m	30sq.m	29.2-35.9sq.m
One Bedroom	3.3m	3.384-3.854m	23sq.m	23-27.5sq.m
Two Bedroom (4P)	3.6m	3.86-6.99m	30sq.m	28.5-33.2sq.m

Table 1.0 Table showing the minimum aggregate floor areas and minimum widths for living/dining/kitchen areas

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

The proposed development is generally compliant with the minimum aggregate floor areas and minimum widths for bedrooms, as shown in the table below. The slight variations proposed in relation to the bedroom widths and floor areas proposed for Apartment Types 3, 4, 5 and 7 are allowable as it falls below 5% and these apartment types achieve overall compliance with the required minimum overall apartment floor areas.

<b>Minimum Floor Areas and Minimum Widths - Bedrooms</b>				
<b>Unit Type</b>	<b>Minimum Width Required</b>	<b>Minimum Width Proposed</b>	<b>Minimum Floor Area Required</b>	<b>Floor Areas Proposed</b>
Studio	4m	3.812-5.94m	30m	29.2-35.9sq.m
Double Bedroom	2.8m	2.81-3.907m	11.4sq.m	10.8-14.6sq.m
Twin Bedroom	2.8m	2.81-3.282m	13sq.m	12.4-16.7sq.m

Table 2.0 Table showing the minimum aggregate floor areas and minimum widths for bedrooms

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 generally complies with the areas above, as seen in Table 3.0 overleaf. The slight variations proposed in relation to the overall aggregate bedroom floor areas proposed for Apartment Types 3 and 4 are allowable as it falls below 5% and these apartment types achieve overall compliance with the required minimum overall apartment floor areas.



Minimum Aggregate Floor Areas - Bedrooms		
Unit Type	Requirement	Floor Area of Proposed Units
One Bedroom	11.4sq.m.	11.6-12.7sq.m.
Two Bedroom (4P)	24.4sq.m.	23.2-29.4sq.m.

Table 3.0 Table showing the minimum aggregate bedroom floor areas

#### Dual Aspect Ratios

Specific Planning Policy Requirement 4 provides guidance in regards 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 92 no. dual aspect apartments, accounting for 37.5% of the 245 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. 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 3 sq m*
- *One bedroom 3 sq m*
- *Two bedrooms (3 person) 5 sq m*
- *Two bedrooms (4 person) 6 sq m*
- *Three or more bedrooms 9 sq m*

Overall the development provides for ample storage for each individual apartment that meets the required storage space needs for each unit. See Table 4.0 below.

Minimum storage space requirements		
Unit Type	Required storage space	Storage space provided
Studio	3sq.m	3.7-4.8sq.m
One Bedroom	3sq.m	3.4-4.8sq.m
Two Bedroom (4P)	6sq.m	6.6-8.2sq.m

Table 4.0 Table showing the provided storage space per apartment type

### Minimum private open space requirements

The overall floor area of private open space provided in each apartment meets the required standards, also the minimum provisions for communal open space also meet the standard requirements, as shown in Table 5.0 overleaf.

Minimum private open space requirements		
Unit Type	Required floor areas for private amenity space	Total provision of private open space
Studio	4sq.m	6.7-9.8sq.m
One Bedroom	5sq.m	5.6-6sq.m
Two Bedroom (4P)	7sq.m	9.7-14.3sq.m

Table 5.0 Table showing the provided floor areas for private open spaces per apartment type

Furthermore, all units are provided with a large communal open space area at ground floor level.

### 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 development includes a provision of 388 no. resident bicycle spaces in a secure and convenient location for each apartment at basement level and 80 no. visitor bicycle spaces located at ground floor level.

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 (2013)**

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 proposed development does not include the provision of a crèche at this time. It is intended to lodge a second application for Site B at a later stage. Site B will include a crèche that will serve the proposed development as well as Site B.

### **6.13 Regional Spatial and Economic Strategy for the Eastern and Midland Region, June 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 Tallaght area set out in the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly 2019-2031. 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 an otherwise underutilised industrial site that is zoned for residential-led regeneration and is well served by high capacity public transport services, in terms of the Tallaght Hospital LUAS stop, which is less than 800 metres from the western boundary of the site, and is less than 250 metres north of the town centre 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 in Figure 35.0 overleaf). 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.'*

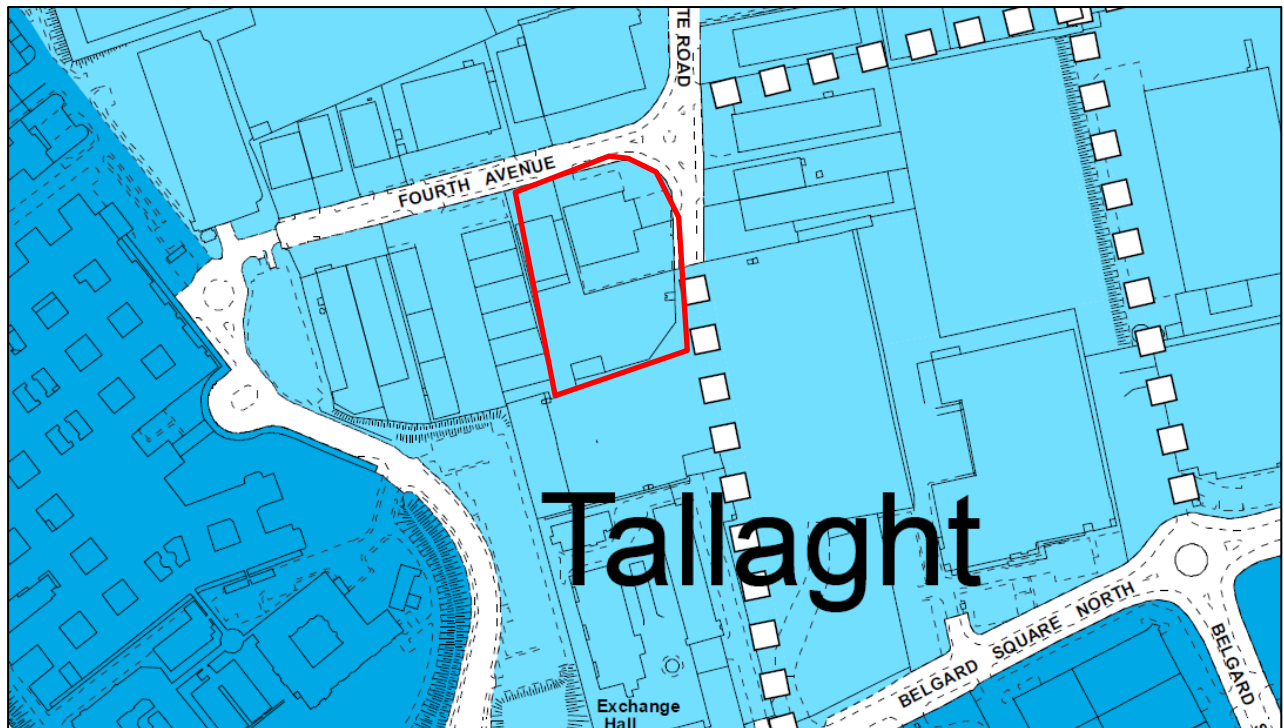


Figure 35.0 Extract from South Dublin County Development Plan 2016-2022 zoning Map No. 9 showing the application site (outlined in red) within lands with Zoning Objective 'REGEN'

The 'REGEN' zone is a new addition to the land-use zoning classifications, in the recently adopted 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 'build-to-rent' housing development, on an otherwise underutilised industrial site that is well served by high frequency public transport services, which include the Tallaght Hospital LUAS stop and Dublin Bus services, located to the west and south of the application site offering direct links to Dublin City Centre and the wider Dublin area. The application site is also within close proximity Tallaght Town Centre (240 metres north of it), where there is a variety of recreational, educational, commercial, employment and retail facilities.

### 6.14.3 Housing

A 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 additional housing units over the period from 2015 to 2022, and the 'Interim Housing Strategy' forecasts that 8,303 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 (see overleaf) 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 to 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 are preferable.

The proposal for the site is to construct a mixed-use development scheme comprising predominantly of

residential built-to-rent apartment units in 4 no. blocks of varying building heights. The proposed 4 no. blocks have been designed and scaled to respect the established residential development within the surrounding area as well as the higher scale development character of the area to the south, whilst providing a layout that allows an adequate provision of surveillance over public spaces within and surrounding the application site, particularly the public open spaces immediately south. 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)* as discussed above.

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 a landmark component which is 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, December 2018, and the development recently approved at Belgard Gardens, Belgard Square North and Belgard Road, Tallaght, Dublin 24 (south-east of the subject site). This particular policy is discussed further in Section 6.3 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 Master Plan has been prepared by Cunnane Stratton Reynolds to accompany this planning application. The Master Plan provides comprehensive detailing of the proposed landscaping and treatment for the proposed development site. The primary objective of the landscape Master Plan is to create unity of design through the language of form, with the incorporation of geometric forms of acute and oblique angles, which will dictate intimate and active spaces.



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 provision for a children's play areas will be required. The subject site comprises an area of approximately 0.71 ha (1.75 acres) and therefore the minimum open space required on the site is 710sq.m. Due to the limited size of the subject site, the proposed development is devoid of public open space. Instead it provides a plaza along the Fourth Avenue and Cookstown Road frontages which will improve linkages to the public open space proposed under the Draft Tallaght Town Centre Local Area Plan 2020-2026 to the immediate south-east of the subject site.

The subject site will be provided with 2813sqm of communal open space located centrally on the site. Furthermore, the proposed development will incorporate a picnic area with tables and seating, outdoor table tennis playspace, playgrounds and lawn areas. Please refer to the Landscape Master Plan prepared by Cunnane Stratton Reynolds, Land Planning and Design 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;
- 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 Tallaght Hospital 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	Total No. of Spaces Required
Proposed Development	69	56	120	213

Table 6.0 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 to be exceeded, and in some instances a lower rate of parking may be 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 basement level, a total of 75 no. car parking spaces (plus 4 no. designated limited mobility car parking 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 is a build-to-rent development and the subject sites proximity to the Tallaght Hospital LUAS stop, located approximately 800 metres south-west of the site on Cookstown Way. Furthermore, Bus Route Nos. 27, 49-N, 54a, 65, 75, 76, 76a, 77-N, 77a, 126 and 132 run along Belgard Square North and the subject development features 388 secure bicycle parking spaces for residents at basement level as well as visitor bicycle spaces located at ground floor level. In addition to sustainable transport options, the proposed development will contain 10 no. Go-Car spaces in the basement level car park, providing residents with access to cars when needed.

### 6.15 Proposed Draft Tallaght Local Area Plan 2020-2026

The subject site is located within the Draft Tallaght Town Centre Local Area Plan 2020-2026 area. This draft Local Area Plan (Draft LAP) was issued for review in September 2019. The purpose of the LAP is to facilitate the future development of Tallaght Town centre, with the aim of creating a vibrant sustainable town. This LAP will replace the current LAP once finalised.

Given the timeline for this application, it is considered relevant to review the draft LAP and assess the proposed development against the plan. However, we note that this LAP is draft and subject to change following consideration of submissions made during the consultation period.

#### 6.15.1 Land Use Zoning

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 Urban Function map (included in Section 2.0 of the Draft LAP) below, the application site is located in 'The Centre' area which has a land use zoning designation of 'Mixed Use A (High Mix Use)'.

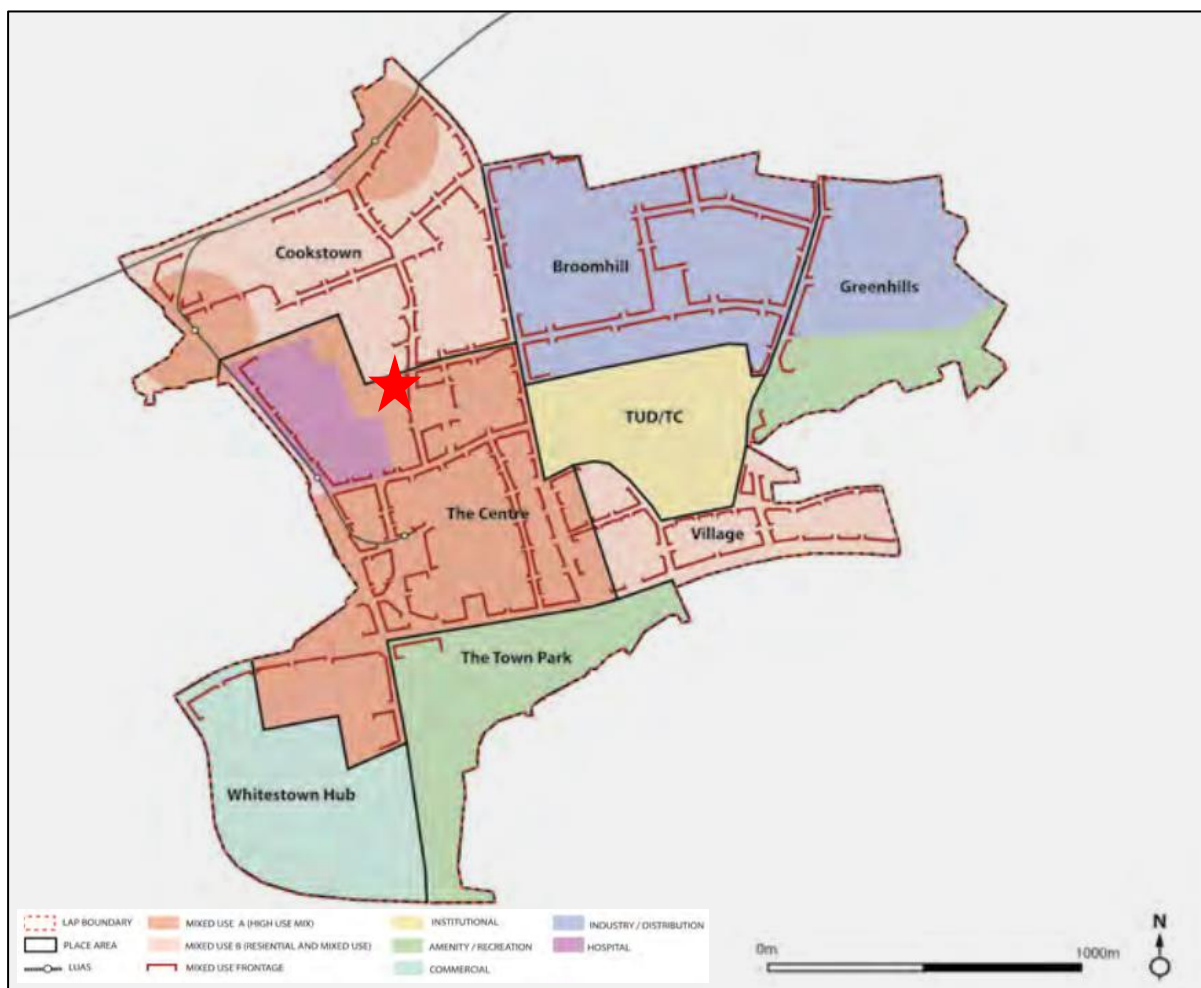


Figure 36.0 Urban Function Map from Draft Tallaght Town Centre Local Area Plan 2020-2026 (subject site identified with red star)

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

We note that the proposed development exceeds the recommended 60% maximum recommended in relation to dwelling units for Build to Rent outlined in Section 5.2.2 of the Draft 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 Draft Tallaght Town Centre Local Area Plan 2020-2026. 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 196 no. 'Build-to-Rent' units have been granted planning permission through the Strategic Housing Development process (under Case Reference: ABP-303803-19) in the area forming the subject of the Draft Tallaght Town Centre Local Area Plan 2020-2026. This approval was for a development at Units 5A-C Second Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24, comprising the following:

*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.*

The other Strategic Housing Development proposal involving Build-to-Rent units submitted in the area forming the subject of the Draft Tallaght Town Centre Local Area Plan 2020-2026 was refused permission on 19<sup>th</sup> June 2019 (under Case Reference: ABP-303911-19). This proposal related to Unit 21, First Avenue, Cookstown Industrial Estate, Dublin 24, and involved:

*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 number '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 only other Strategic Housing Development considered by the Board in the area forming the subject of the Draft Tallaght Town Centre Local Area Plan 2020-2026, included a different type/mix of residential units to that proposed on the subject site. The applicable application (ABP Case No. 303306) related to a site at Belgard Gardens, Belgard Square North and Belgard Road, Tallaght, Dublin 24, and involved the following proposal (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).*

A review of the South Dublin County Council planning register revealed no planning applications involving 'Build-to-Rent' units currently being considered or having been recently decided in the area forming the subject of the Draft 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 Draft Tallaght Town Centre Local Area Plan 2020-2026.

Further to the above, would also argue that the inclusion of this prescriptive requirement in the Draft LAP is contrary to National Policy Guidance, including the Building Height Guidelines and should not



form part of the adopted LAP. We would argue that a scheme of this small scale would be unviable if a minimum of 30% of dwelling units were to be provided for owner occupation/private sale as recommended in the same section. 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.

### 6.15.2 Key Objectives

The following Key Objectives are outlined for 'The Centre' Neighbourhood in Section 3.2 of the Draft LAP:

- *Continue the transformation of the centre with an increase in existing residential, commercial, retail, civic, services and cultural uses and functions.*
- *Support the continued function of Tallaght Hospital and facilitate improved access to the hospital.*
- *Improve urban legibility throughout the area by providing new local streets including an extension to Airton Road to Cookstown Road; and Cookstown Road to Belgard North; and a new connection from Belgard North to Tallaght Square.*
- *Improve the condition of existing streets to encourage walking and cycling.*
- *Facilitate and support the delivery of a transport interchange integrating Luas, bus, cycle & taxi on land in and around Tallaght Square.*
- *Facilitate economic development and provide an enterprise centre.*
- *Improve interface with all existing and proposed routes and open spaces.*
- *Encourage new development on existing areas of surface car parking.*
- *Provide new primary and secondary open spaces. Including provision of a new urban square to the north of Belgard Square North.*
- *Improve and enhance the public realm.*
- *Improve connectivity to all surrounding areas.*
- *Promote the provision of a post primary school to serve the Tallaght catchment.*
- *Promote provision of primary school to serve the area.*

The subject proposal helps achieve the above key objectives as it introduces residential and commercial/retail uses to this underutilised site; improves urban legibility throughout the area, as well as connectivity to all surrounding areas, by providing a generous setback from the southern boundary to facilitate the future link indicated in the Draft LAP; and improves the condition of existing streets/public realm by setting back the buildings northern and eastern elevations to create a pedestrian friendly plaza provided along the Cookstown Road and Fourth Avenue frontages.

### 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 Draft LAP (an excerpt of which features in Figure 37.0 below) sets out a range of appropriate plot ratios across the plan lands, where proposals go beyond the plot ratio identified the proposal would need to deliver significant public gain.

Neighbourhood	Min - Max Plot Ratio
<b>Centre</b>	1.5 - 2.0
<b>Cookstown</b>	Base

Figure 37.0 Plot ratio ranges included in Table 2.0 featuring in Section 2.6.1 of the Draft LAP

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;*
- *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*
- *Other public domain works or improvements to be agreed with the Council.*

In the longer term, over a period of up to 20 years, it is envisaged that the full build out of the LAP lands could deliver between 9,700 to 12,800 new homes, achieve a population of up to 38,000 people within the LAP lands and an additional 570,000m<sup>2</sup> to 918,000m<sup>2</sup> of non-residential floor space which could accommodate an additional 4,700 to 12,800 jobs. To reach this target, it is considered that higher density residential developments will play an important role in Tallaght.

The proposed development is for 245 no. a 'build-to-rent' residential apartments which equates to a plot ratio of 3.1. Although in exceedance of the above maximum, we consider the plot ratio proposed to be appropriate in light of recent national policy guidance regarding the intensification of development in areas well serviced by public transport and in the context of the development approved, under ABP Case No. 303306, south-east of the subject site at Belgard Gardens, Belgard Square North and Belgard Road, Tallaght, Dublin 24.

Further to this, we consider the pedestrian friendly plaza provided along the Cookstown Road and Fourth Avenue frontages as well as the generous setback adopted from the southern boundary to facilitate a future link indicated in the Draft LAP to constitute significant public gain.

### Height

As mentioned previously, the subject site is situated within an area known as 'The Centre' Neighbourhood Area under the Draft LAP. This area is designated for buildings of up to seven-storeys in height, as shown in the Overall Urban Structure Diagram in Figure 38.0 overleaf.

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.

In general terms, the height strategy 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).*

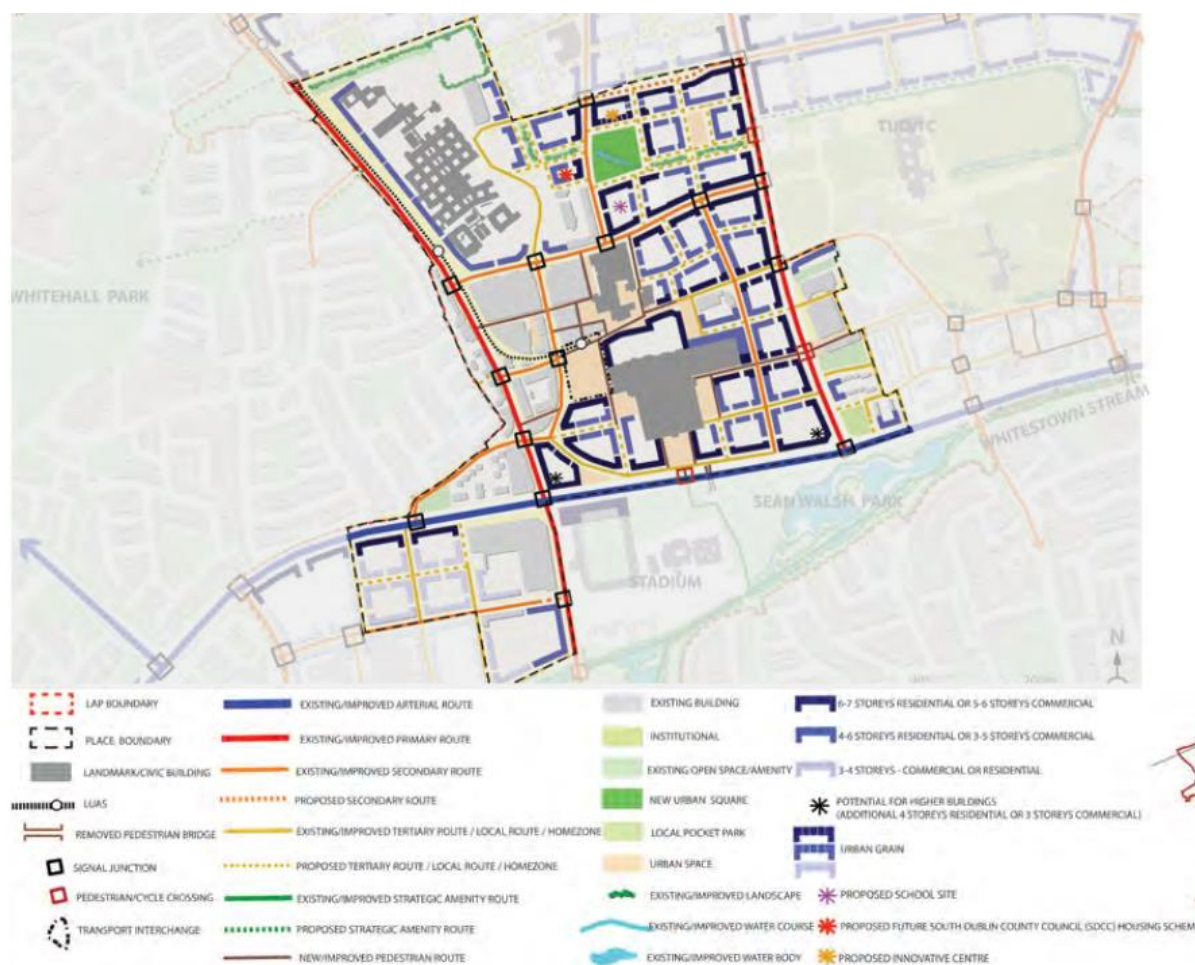


Figure 38.0 Overall Urban Structure Diagram included in Figure 3.3 in Section 3.2 of the Draft LAP

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. A 2–3 storey increase on the above typical levels may be considered for key or landmark sites where sites exceed 2 ha in area and can establish its own identity. Buildings over 10 storeys would generally not be supported. Tall buildings must have regard to the following criteria:

- *Surrounding, established scale and height.*
- *Impact on daylight and sunlight of the development, surrounding development and private, semi-private and public open spaces.*
- *Impact on skyline, urban silhouette or streetscape (including overbearing).*
- *Other social or physical infrastructural benefits from the development, such as public realm contribution.*
- *Proximity to high quality public transport.*

Where justified by a Design Statement, building elements higher than 8 storeys must be designed as corner features or similar limited elements of urban blocks to define streetscape, respond to public spaces or close urban vistas. Where taller landmark buildings are proposed they should achieve the highest standards of design including high quality and robust materials, should contribute to an emerging skyline for Tallaght and should be slender buildings that successfully manage their environmental impacts on surrounding lands.

Building design as opposed to building height is the key determinant in producing an acceptable Landmark Building and such buildings should be of high quality design. Developers are encouraged to consider an architectural design competition in conjunction with the Council to inform the design of

Landmark Buildings. Landmark Buildings should therefore be designed in a manner that is distinctive from surrounding buildings both in terms of architectural treatment and use of materials.

The proposed development is located to the south-west of the intersection of Cookstown Road and Fourth Avenue and comprises 4 no. Blocks varying in height from 6-11 storeys, rising to eleven-storeys in the north-eastern corner. The higher built form elements in the north-eastern corner of the subject site present as a landmark building and are of a high architectural quality.

The slight departure from the heights recommended in the Draft LAP is considered appropriate as there have been considerable changes in National policy guidance regarding housing provision, including the introduction of the Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018 (discussed in Section 6.3 previously).

It is also submitted that the proposed heights are justifiable given the recent decision by An Bord Pleanála to grant permission for a Strategic Housing Development on lands at Belgard Gardens, Belgard Square North and Belgard Road, immediately east and south-east of the subject site. This development comprises heights of up to 10 storeys.

The application is accompanied by a Daylight and Sunlight Analysis, prepared by 3D Design Bureau, that confirms that the building height and form proposed does not result in inappropriate levels of amenity to residents of the proposed apartments or users of the proposed central courtyard. 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.

In light of the amenity levels afforded to residents of the development, the public gain resulting from the proposed development and the location/design of the proposed development, it is submitted that the maximum height of 11 storeys proposed for this development is consistent with nearby precedents and is an acceptable one storey departure from the recommendations of the Draft LAP.

### 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:

- It creates active ground floor frontages due to the inclusion of commercial/retail and active residential (front doors, windows) uses along the Cookstown Road and Fourth Avenue 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.

## **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 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 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.

## 8.0 Information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018

The Notice of Pre-Application Consultation Opinion, issued by An Bord Pleanála on 11<sup>th</sup> July 2019, 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 specific information. This list of requested items included the following (Item No. 7 to be specific):

*The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2019, as amended.*

This requested information is included as an Appendix to this report (see Appendix A) thus satisfying this aspect of the Board's Notice of Pre-Application Consultation Opinion.

## 9.0 Conclusion

In conclusion, we submit that the proposal which comprises the demolition of the existing industrial buildings on site and the construction of a 'build-to-rent' housing development accommodating 245 no. residential apartments, 75 no. car parking spaces (plus an additional 4 no. limited mobility spaces); 388 secure bicycle parking spaces for residents; 2 no. commercial ground floor units; and 880sq.m of communal space at Units 66 & 67 Fourth Avenue, 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, which is the key planning policy document at a local level, and the Draft Tallaght Town Centre Local Area Plan 2020-2026.

It is considered that the proposed 'build-to-rent' development comprising 245 no. residential units 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, a hospital, numerous employment centres, and in close proximity to a Luas line, 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.



Kevin Hughes MIPI MRTPI Director  
for HPDC.

## **Appendix A - Information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2019, as amended.**

Article 299B of the Planning and Development Regulations 2001-2019, as amended, outlines requirements in relation to environmental impact assessment for subthreshold development where no screening determination was made under section 7 of Act. Article 299B(1)(b)(ii)(II) and Article 299B(1)(c) of the Planning and Development Regulations 2001-2019, as amended, read as follows:

*(b) (i) The Board shall carry out a preliminary examination of, at the least, the nature, size or location of the development.*

.....

*(ii) Where the Board concludes, based on such preliminary examination, that—*

.....

*(II) there is significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed development, it shall satisfy itself that the applicant has provided to the Board*

*(A) the information specified in Schedule 7A,*

*(B) any further relevant information on the characteristics of the proposed development and its likely significant effects on the environment, and*

*(C) a statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account.*

*(c) The information referred to in paragraph (b)(ii)(II) may be accompanied by a description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment of the development.*

Schedule 7A referred to in Article 299B(1)(b)(ii)(II)(A) reads as follows:

1. *A description of the proposed development, including in particular—*
  - (a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and*
  - (b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.*
2. *A description of the aspects of the environment likely to be significantly affected by the proposed development.*
3. *A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—*
  - (a) the expected residues and emissions and the production of waste, where relevant, and*
  - (b) the use of natural resources, in particular soil, land, water and biodiversity.*
4. *The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.*

To assist with the Board determination, we provide the following information:

**(i) Environmental Assessment**

An assessment against Schedules 7 and 7A of the Planning and Development Regulations 2001-2019, as amended, are provided below. Schedules 7 schedule sets out criteria for determining whether development listed in Part 2 of Schedule 5 should be subject to an environmental impact assessment. Schedule 7A outlines information to be provided by the Applicant or Developer for the purposes of screening sub-threshold development for environmental impact assessment.

**Schedule 7A**

Consideration of the proposed development in the context of Schedule 7A referred to in Article 299B(1)(b)(ii)(II)(A) is provided below (in some instances the reader is referred to previous sections of this report or documents accompanying the application):

**1. A description of the proposed development, including in particular—*****(a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and***

Please refer to Section 5.0 of this report in conjunction with the architectural drawings, prepared by C+W O'Brien Architects, which accompany this application for information pertaining to the proposed development and associated demolition works.

***(b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.***

The location of the subject site is discussed in Section 2.0 of this report. The subject site is located in a long-established industrial estate, known as the Cookstown Industrial Estate, and is not located in or adjacent to a geographical area of particular environmental sensitivity.

**2. A description of the aspects of the environment likely to be significantly affected by the proposed development.**

There are no aspects of the environment likely to be significantly affected by the proposed development.

**3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—*****(a) the expected residues and emissions and the production of waste, where relevant, and***

Please see the Construction and Demolition Waste Management Plan, prepared by GDCL Consulting Engineers, which accompanies this application for information on expected waste resulting from the proposed development, both as a result of demolition/construction and operation.

***(b) the use of natural resources, in particular soil, land, water and biodiversity.*****4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.**

The criteria set out in Schedule 7 are provided below.

**Schedule 7**

Consideration of the proposed development in the context of Schedule 7 is provided overleaf (in some instances the reader is referred to previous sections of this report or documents accompanying the application):



## **1. Characteristics of proposed development**

### ***The characteristics of proposed development, in particular—***

#### ***(a) the size and design of the whole of the proposed development,***

Please refer to Section 5.0 of this report in conjunction with the architectural drawings, prepared by C+W O'Brien Architects, which accompany this application for information pertaining to the size and design of the proposed development. In summary, the proposal involves a small-scale residential development.

#### ***(b) cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment,***

The subject site is located in an area which is subject to a Local Area Plan (LAP), more specifically the Tallaght Town Centre Local Area Plan. The most recent iteration of this LAP, the Draft Tallaght Town Centre Local Area Plan 2020-2026, was published in September 2019. This LAP, as did ones previous to this iteration, provides a detailed framework for the development of the Tallaght Town Centre including lands within the Cookstown Industrial Estate.

In preparing the Draft Tallaght Town Centre Local Area Plan 2020-2026 and previous iterations of this LAP, South Dublin County Council would have had to carry out a Strategic Environmental Assessment (SEA), pursuant to the requirements of Directive 2001/42/EC. A SEA is the process by which environmental considerations are required to be fully integrated into the preparation of plans and programmes prior to their final adoption. An SEA is mandatory for such LAPs.

The SEA carried out concludes that subject to the full and proper implementation of the mitigation measures outlined in this SEA Environmental Report and the Tallaght LAP 2020-2026 including detailed design at planning application stage, it is considered that significant adverse impacts on the environment will be avoided.

The proposed development has been set within the context of the Draft Tallaght Town Centre Local Area Plan 2020-2026 and therefore is responsive to and consistent with the plan-led future potential development of the wider area.

#### ***(c) the nature of any associated demolition works,***

Please refer to Section 5.0 of this report in conjunction with the architectural drawings, prepared by C+W O'Brien Architects, which accompany this application for information pertaining to demolition. In summary, the proposal involves the demolition of industrial buildings on site (comprising 2,518sq.m).

#### ***(d) the use of natural resources, in particular land, soil, water and biodiversity,***

The subject proposal does not involve the use of natural resources save for the use of soil and water in the context of construction works.

#### ***(e) the production of waste,***

Please see the Construction and Demolition Waste Management Plan, prepared by GDCL Consulting Engineers, which accompanies this application for information on expected waste resulting from the proposed development, both as a result of demolition/construction and operation.

#### ***(f) pollution and nuisances,***

Due to the nature of the proposed development, being residential, and construction method being utilised, modular construction, there is limited risk of pollution. This limited risk will be minimised through the adoption of best practise construction and site management. During construction, there will be a

degree of pollution associated with resultant noise and dust. However, the quick construction time facilitated by modular construction means this pollution/disruption will be for a relatively short period of time.

***(g) the risk of major accidents, and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge, and***

Given the scale and nature of the development, a residential scheme on a 0.71Ha site, there is no potential for major accidents, and/or disasters.

***(h) the risks to human health (for example, due to water contamination or air pollution).***

There may be possible short-term nuisances to human beings during the construction phase of the development as a result of noise, dust and minor traffic delays/diversions resulting from material deliveries and ground excavation works during demolition and construction. Noise, dust and pollution will be subject to standard mitigation measures as per typical construction projects. Construction vehicles and plant will give rise to exhaust and particulate emissions. No adverse effects on human health from vehicle and plant emissions during construction are anticipated.

## **2. Location of proposed development**

***The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to—***

- (a) the existing and approved land use,***
- (b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,***
- (c) the absorption capacity of the natural environment, paying particular attention to the following areas:***
  - (i) wetlands, riparian areas, river mouths;***
  - (ii) coastal zones and the marine environment;***
  - (iii) mountain and forest areas;***
  - (iv) nature reserves and parks;***
  - (v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;***
  - (vi) areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure;***
  - (vii) densely populated areas;***
  - (viii) landscapes and sites of historical, cultural or archaeological significance.***

The subject site is located in a long-established industrial estate, which has negligible natural resources (including soil, land, water and biodiversity). The subject site is not in close proximity to any wetlands, riparian areas, river mouths, coastal zones and the marine environment, mountain and forest areas, nature reserves and parks, densely populated areas or landscapes and sites of historical, cultural or archaeological significance. The subject proposals potential impact on Natura 2000 areas is considered in Section ii of this Appendix.

## **3. Types and characteristics of potential impacts**

***The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of***

***‘environmental impact assessment report’ in section 171A of the Act, taking into account—***

- (a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),***
- (b) the nature of the impact,***
- (c) the transboundary nature of the impact,***
- (d) the intensity and complexity of the impact,***
- (e) the probability of the impact,***
- (f) the expected onset, duration, frequency and reversibility of the impact,***
- (g) the cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment, and***
- (h) the possibility of effectively reducing the impact.***

This is not a large-scale project or overly dense in an urban context. There are no apparent characteristics or elements of the design of the scheme that are likely to cause significant effects on the environment. A more detailed assessment of the proposed developments impact on the environment is provided under various headings below:

#### Population and Human Health

There may be possible short-term nuisances to human beings during the construction phase of the development as a result of noise, dust and minor traffic delays/diversions resulting from material deliveries and ground excavation works during demolition and construction. Noise, dust and pollution will be subject to standard mitigation measures as per typical construction projects. Construction vehicles and plant will give rise to exhaust and particulate emissions. No adverse effects on human health from vehicle and plant emissions during construction are anticipated.

The proposed development is likely to have a positive direct effect on local employment and economic activity, particularly in the construction sector. The construction phase will also have positive indirect effects on employment and economic activity in associated and secondary building services industries, e.g. quarrying, building supplies, retail and technical professions.

Once completed, the proposed development will deliver 245 no. residential units and 2 no. commercial/retail units. The proposed residential units, once available, will reduce pressure on the existing rental market in the area, while the commercial/retail units will serve residents in the surrounding area/provide employment.

In the case of the proposed residential units, a high standard of living which will be beneficial for the wellbeing of the future inhabitants, will result from the layout/quality of the proposed units, the large open space areas and the ancillary services provided on site. Residents of the surrounding area will also benefit from the commercial units and landscaped areas provided along the Cookstown Road and Fourth Avenue frontages.

More broadly, the resultant increase in population will assist with the delivery of critical mass to support a wider range of businesses, services, public transport and employment opportunities in the area.

No significant adverse cumulative effects on population and human health are anticipated during the construction or operational phases of this development.

#### Biodiversity

The subject site is devoid of any ecological significance having previously been almost entirely dominated by man-made structures such as buildings and hard surfaces.

As will be discussed in Section ii, the subject site is not included in any Natura 2000 site and does not support any of the habitats or species of interest listed. The nearest Natura site is the Glenasmole Valley

SAC which is located c. 4km away, and there is no direct connection to these Natura 2000 sites from proposed site.

Given the above, it is considered that the proposed development will not impact on the existing flora and fauna network in the area.

The proposed development includes large areas of landscaping and planting. Once completed, the development will enhance the flora and fauna network in the area.

#### Land, soil, water, air and climate

##### *Lands and Soils*

The subject lands are a brownfield on what is typically made land. There is not likely to be significant effects on the environment with regard to soils and/or geology due to the site being connected to public foul, storm and water services.

According to the EPA website, there are no recorded waste disposal or contaminated sites located in proximity to the proposed site. According to the EPA database there are no reported contaminated soil or groundwater issues present at this site.

##### *Water*

The subject site is generally brownfield formerly in use as an industrial unit (presently a motor showroom). The land is zoned and relatively small in scale at c. 0.71 hectares. The construction or operation of the scheme would not use such a quantity of water to cause concern in relation to significant effects on the environment.

The proposed development does not adjoin a river or stream, therefore, there are no anticipated significant effects on the environment arising from the proposed development, in relation to water.

In terms of water integrity, the scheme is to be connected to public foul and storm water systems and as such, no significant effects on the environment are likely.

##### *Air & Climate*

There may be a minor degradation of the air quality in a very localised area during certain parts of the construction process. Activities associated with this development such as excavation and backfill having the potential to generate dust. There is no impact on air pollution expected from the development outside of the potential dust impact. Standard mitigation measures will be employed to limit this impact.

There will be no large use of natural resources. The main use of resources will be the construction materials used. The scale and quantity of the materials used will not be such that would cause concern in relation to significant effects on the climate or the environment.

There is the potential for a number of greenhouse gas emissions to the atmosphere during the construction phase of the development. Construction vehicles, generators etc., may give rise to CO<sub>2</sub> and N<sub>2</sub>O emissions, however, the exhaust emissions from on-site plant and site traffic are unlikely to make a significant impact on local air quality.

It is considered that there will be no negative impact on the climate that would be likely to have a significant effect on the environment.

#### Material assets, including the architectural and archaeological heritage, and the cultural heritage

The land on which the site is situated is a material asset. It has been zoned for development through the appropriate process, and as such, the use of this material asset in a manner compatible with the zoning designation, is entirely appropriate. Once constructed, the operational phase will provide an important material asset for the area in terms of residential units.



The subject lands are not proximate to any Protected Structure or Architectural Conservation Area. There are no known recorded archaeological monuments within the boundary or within several hundred metres of the site.

The expected effects deriving from the vulnerability of the project to risks of major accidents and/or disasters

Standard construction practices will be employed throughout the construction phase. There are no technologies or substances to be used in the development which may cause concern for having likely significant effects on the environment.

The subject lands are zoned under the South Dublin County Development Plan and as such have been subject to a strategic flood risk assessment. A site-specific flood risk assessment, prepared by GDCL Consulting Engineers (forming part of the Engineering Services Report), included with this application to the Board has not highlighted cause for concern in terms of flooding allowing for climate change. This assessment concluded that the site is at low risk of flooding from fluvial, pluvial, tidal and groundwater sources.

In conclusion, it is considered that the proposed development will not have any significant impacts on the environment. All recommended mitigation measures and standard practices will be employed throughout the construction and operation phase of the development to ensure that the proposed development will not create any significant impacts on the quality of the surrounding environment.

**(ii) Appropriate Assessment – EU Habitats Directive**

The EU Directive on the Conservation of Habitats, Flora and Fauna (92/43/EEC), commonly known as “the Habitats Directive”, was adopted in 1992, came into force in 1994 and was transposed into Irish law in 1997. The main aim of the Habitats Directive is to contribute towards the conservation of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes to the Directive at a favourable conservation status. These annexes list habitats (Annex I) and species (Annexes II, IV and V) which are considered threatened in the EU territory.

This section provides for a screening of the proposed residential development and its potential effects in relation to Natura 2000 sites (SACs and SPAs).

With regards to effects on a European site, from analysis of the NPWS mapping system it was determined that the site of the proposed development and the corresponding grid connection is not located in a site of European importance (Natura 2000 Site). We note, there is no prescribed radius around a site for determining what Natura 2000 sites should be studied. The screening process has examined the details of the proposed residential development and has considered the Initial screening of NATURA 2000 sites within 10km of the proposed development (Figure 1.0 and Table 1.0 overleaf).

The proposed development will have no direct or measurable indirect impacts on the habitats in question. The screening assessment found that significant impacts of the proposed development on the qualifying interests of the SPA's and SAC's are not likely. This development site is not an important feeding habitat for merlin or peregrine falcon and has no direct or indirect pathway to the Wicklow Mountains SPA. The main potential indirect risk from the development of the subject site to SAC's is considered to be the indirect hydrological connection of the development to the surrounding aquatic Natura sites. However, foul and surface water management in accordance with current standards and best practice will ensure no negative impact on any protected habitats.

Accordingly, progression to Stage 2 of the Natura Impact Statement process is not considered necessary.

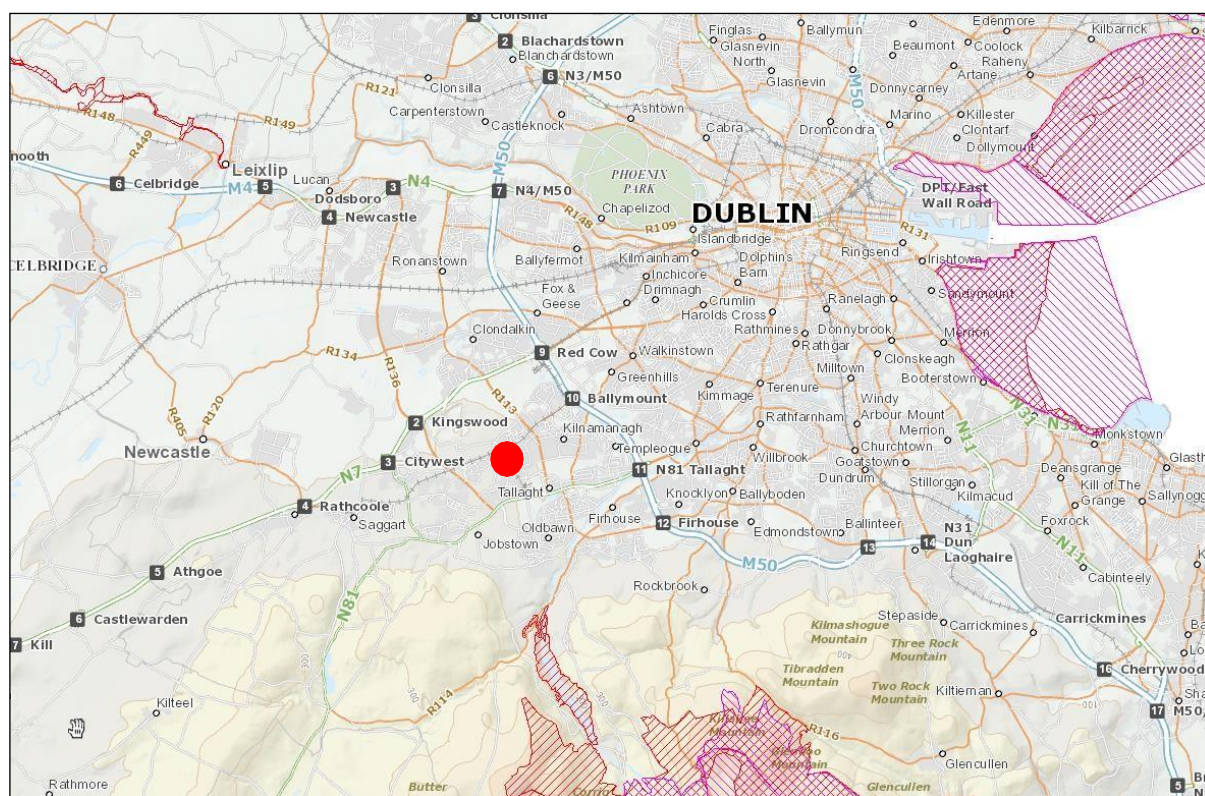


Figure 1.0 Extract from [www.npws.ie](http://www.npws.ie) showing the application site (marked in red) and proximate Natura 2000 habitats

Designated Area	Site Code	Distance from Subject Site	Qualifying Interests
Glenasmole Valley SAC	001209	c. 4km	<ul style="list-style-type: none"> <li>6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco Brometalia</i>);</li> <li>6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>); and</li> <li>7220 Petrifying springs with tufa formation (<i>Cratoneurion</i>).</li> </ul>
Wicklow Mountains SAC	002122	c. 6.3km	<ul style="list-style-type: none"> <li>3110 Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>);</li> <li>3160 Natural dystrophic lakes and ponds</li> <li>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i>;</li> <li>4030 European dry heaths</li> <li>4060 Alpine and Boreal heaths;</li> <li>6130 Calaminarian grasslands of the <i>Violetalia calaminariae</i>;</li> <li>6230 Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe)</li> <li>7130 Blanket bogs; and</li> <li>8110 Siliceous scree of the montane to snow levels.</li> </ul>
Wicklow Mountains SPA	004040	c. 8.3km	<ul style="list-style-type: none"> <li><i>Falco colombarius</i> (Merlin) [A098]</li> <li><i>Falco peregrinus</i> (Peregrine) [A103]</li> </ul>

Table 1.0 List of Special Areas of Conservation (SAC) and Special Protected Areas (SPAs) and their distance from the subject site