



An
Bord
Pleanála

**Case Reference:
ABP-311753-21**

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: 236 no. apartments, creche and associated site works. Lands at Greenhills Road, Tallaght, Dublin 24.

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

1. Further clarification of the documents as they relate to the nature of the development and the proposed tenure mix.
2. Further consideration / justification of the documents as they relate to the height, scale and density of development proposed. In this regard the application should be accompanied by a detailed Rationale / Justification for the proposed density and building heights, having particular regard to section 2.6 of the Tallaght Town Centre LAP 2020 in respect of *Intensity of Development* and

section 3.6 in relation to the Greenhills neighbourhood, and the provisions of the County Development Plan in this regard, as well as the criteria set out in Section 3.2 of the Urban Development and Building Height, Guidelines for Planning Authorities' 2018.

This may require possible amendment to the documents and/or design proposals submitted.

3. Further consideration and elaboration of the documents as they relate to the design and capacity of the existing vehicular access from the north which is to serve the proposed development.

This access route should be described in detail in the application drawings and an assessment of its capacity in terms of width, alignment, pedestrian facilities and existing parking and access functions should be undertaken. The requirement for any improvement works along this route to safely and satisfactorily accommodate the traffic movements arising, and the ability of the applicant to undertake same, should be clearly described.

This may require possible amendment to the documents and/or design proposals submitted.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. Having regard to the response to item no. 1 above, the Statement of Consistency and Housing Quality Assessment should clearly address the particular requirements of Build-To-Rent and Build-To-Sell accommodation proposed, including inter alia, requirements relating to floor areas, mix, storage, units per core etc. A statement demonstrating compliance with SPPR7 with regard to provision of supporting communal and recreational facilities for BTR accommodation, should be provided.

Regard should be had to relevant and up to date S.28 Ministerial Guidelines, including the Sustainable Urban Housing Design Standards for New Apartments, Guidelines for Planning Authorities (2020).

2. A management plan which addresses the varied requirements of the proposed tenure mix within the development, and associated amenities and facilities, as well as the relationship with other commercial uses within the development.
3. The application should include a comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity / open spaces, as well as potential impacts on daylight and sunlight to adjoining properties. In preparing such assessment regard should be had to the provisions of section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and to the approach outlined in guides like the BRE 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.
The assessment should provide a comprehensive view of the performance of the entire development in respect of daylight provision. Where any alternative, compensatory design solutions in respect of daylight are proposed, these should be clearly identified and justified, and their effect appropriately described and / or quantified.
4. An analysis of wind microclimate and pedestrian comfort, with reference to pedestrian occupation and usability of new public spaces in the context of the proposed development and adjoining permitted developments. The analysis should also address the safety and comfort of residential amenity spaces, including communal spaces, roof terraces and private upper floor balconies. Any required mitigation or other design measures arising from such assessment should be clearly described and assessed in the study.
5. A noise impact assessment having regard to the pattern of commercial uses to the north and east, as well as commercial uses within the proposed development, which should identify measures necessary to ensure the achievement of adequate levels of residential amenity for future occupiers.

6. An Aeronautical Assessment in respect of the proposed development.
7. Drawings clearly showing the relationship between the proposed development and future public transport improvements along Greenhills Road as part of Bus Connects, including modifications and upgrades to footpaths, bus stops and junctions. The application should clearly describe works in the public realm, including responsibility for completion, and how the development will connect to the existing and future public footpath network on Greenhills Road.
8. The application should be accompanied by the following:
 - a) A Traffic and Transport Impact Assessment (TTIA), which includes consideration inter alia of proposed modifications to traffic flow on Greenhills Road and roads within the Hibernia Industrial Estate as part of Bus Connects.
 - b) A Mobility Management Plan.
 - c) A Parking Management Strategy, including detail on the breakdown of parking provision by type and land use.
 - d) A Quality Audit demonstrating compliance with the principles and specifications set out in DMURS and the National Cycle Manual. This should include a Road Safety Audit which considers inter alia the design and layout of the proposed car park and the vehicular access route from the north.
 - e) Details of the quantum and design of bicycle parking / storage, which should accord with the provisions of the guidelines on Sustainable Urban Housing: Design Standards for New Apartments. Regard should be had to the access and operational requirements of such parking / storage provision.
 - f) A Servicing and Operations Management Plan for commercial, childcare and residential uses across the site. The application should also address possible impacts on ground floor residential amenities in Block A from commercial servicing arrangements.

9. A full landscape and visual impact assessment which shall include photomontages and appropriate CGI's showing the proposed development from the surrounding area. Application documentation should illustrate the relationship between the proposed development and adjoining existing and permitted development in this area.
10. A report that specifically addresses the proposed materials and finishes to the scheme, including specific detailing of external finishes, landscaping and paving, pathways, entrances and boundary treatments. Particular regard should be had to the requirement to provide high quality, durable and sustainable finishes which have regard to the context of the site.
11. A Building Lifecycle Report in accordance with section 6.13 of the Sustainable Urban Housing, Design Standards for New Apartments, Guidelines for Planning Authorities (2020) guidelines which should consider the external materials on all elevations. The report shall also address the management and maintenance of public spaces and access routes to the development.
12. A site layout plan, which clearly identifies areas to be taken in charge, if any.
13. Where the applicant considers that the proposed strategic housing development would materially contravene the South Dublin County Development Plan or the Tallaght town Centre LAP 2020, other than in relation to the zoning of the land, a statement indicating the plan objective(s) concerned and why permission should, nonetheless, be granted for the proposed development.
14. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 unless it is proposed to submit an EIAR at application stage.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

- 1. Irish Water**
- 2. National Transport Authority**
- 3. South Dublin Childcare Committee**

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Stephen O'Sullivan
Assistant Director of Planning
January, 2022