



An
Bord
Pleanála

S. 4(1) of Planning and Development (Housing) and Residential Tenancies Act 2016

Inspector's Report ABP-303911-19

Strategic Housing Development

Construction of 150 Build-to-Rent and
222 shared accommodation
bedspaces

Location

Unit 21, First Avenue, Cookstown
Industrial Estate, Tallaght, Dublin 24

Planning Authority

South Dublin County Council

Applicant

Bartra Property Ltd

Prescribed Bodies

Irish Water

National Transport Authority

Transport Infrastructure Ireland

The Irish Aviation Authority

Health Service Executive

Observer(s)

4 no. submissions/observations

Date of Site Inspection

3rd May 2019

Inspector

Joanna Kelly

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1.0 Introduction

This is an assessment of a proposed strategic housing development submitted to the Board under section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016 as amended.

2.0 Site Location and Description

- 2.1 The development site is located approx. 9kms south-west of the city centre within the jurisdiction of South Dublin County Council. The subject site, which has a stated area of circa 1.077 hectares, is located on First Avenue within the Cookstown Industrial Estate, approx. 1.1km north of the Square, Tallaght.
- 2.2 The site currently has two larger warehouse/industrial type units and a number of smaller types structures/units along the western boundary including a small café which was operational at time of inspection. The site is bounded by First Avenue to the north and Cookstown Road to the east. The immediate land-uses within the industrial park are industrial/warehouse type units. First Avenue is characterised by a number of engineering/industrial units including accident or service repair garages. Parking in the area is very limited with vehicles parked along roads and within sites. The immediate local road network also carries a significant number of HGVs as witnessed at time of inspection.
- 2.3 The Belgard Luas stop is located approx. 500m north of the site via the industrial estate. There are also bus stops located along Belgard Road.

3.0 Proposed Strategic Housing Development

Table 1: Build-to-Rent Units proposed

Units Type	No of units	% of each Unit type
1 bed	57	38%
2 bed	72	48%
3 bed	21	14%
Total	150 Units	100%

Table 2 Specifics of each BTR Block

Block 1	No. of Units	Communal Space and Terrace 710sq.m.
1 bed units	19	
2 bed units	23	
3 bed units	4	
Total	46	

Block 2	No of Units	Communal Space and terrace 593sq.m.
1 bed units	16	
2 bed units	30	
3 bed units	6	
Total	52	

Block 3	No of Units	Communal Space 380sq.m.
1 bed units	22	
2 bed units	19	
3 bed units	11	
Total	52	

Table 3: Key development details

Detail	Proposal
No. of Units	150 Build to Rent units
Shared Accommodation	222 Bedspaces
Commercial floor space	92 sq.m. total
Site Area – stated by applicant	1.077 ha red-line boundary

Density	673 bedspaces per hectare net (stated by applicant)
Building Height	5-8 storeys
Site Coverage	38%
Dual Aspect Apartments	58%
Childcare Facility	No
Car parking	64 spaces
Bicycle parking	488 total + visitor spaces approx. 98
Part V proposal	52 units – 35% of overall units

4.0 Planning History

No noted recent planning history with the application site

Recent SHD applications in the Cookstown Area

File Ref. No. ABP303306-18 Permission granted under SHD for 438 no. apartments and 403 no. student bedspaces at the junction of Belgard Road and Belgard Square north.

File Ref. No. ABP 303803-19 Current SHD Application for 196 Build-to-Rent Scheme on lands at Cookstown Way.

5.0 Section 5 Pre-Application Consultation

5.1. Overview

A section 5 pre-application consultation took place at the office of An Bord Pleanála on 23rd October 2018. The main topics raised for discussion at the tripartite meeting were based on the agenda that issued in advance as follows:

1. Development strategy for the site in the context of its location relative to Tallaght town centre and adjoining REGEN lands: layout; connectivity; height and design
2. Residential amenity- quantum and distribution of communal facilities, internal amenity and open space
3. Access and parking
4. Any other matters

A copy of the Inspector's report and Opinion is on the file for reference by the Board.
A copy of the record of the meeting is also available on the file.

5.2. Notification of Opinion

An Bord Pleanála issued notification that, it was of the opinion, the documents submitted with the request to enter into consultation, require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development. The following is a brief synopsis of the issues noted in the Opinion that needed to be addressed:

1. Further consideration of the documents as they relate to the site's context in particular the relationship of this site with other REGEN lands within the overall area. Further consideration of the documents as they relate to the height strategy for the site and the design of the proposed development. In this regard, the prospective applicant should satisfy themselves that the design strategy for the site provides the optimal architectural solution for this strategic site and that it is of sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term. In this regard, the submitted documents should allow for further consideration of the elevational treatments and proposed materials. The proposed development shall have regard to inter alia, national policy including the National Planning Framework and Sustainable Urban Housing: Design Standards for New Apartments March 2018 and local planning policy, the site's context and locational attributes.

2. Further consideration of documents as they relate to the layout of the proposed development particularly in relation to permeability and the criteria set out in the Urban Design Manual relating to 'Connections' which accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' and the Design Manual for Urban Roads and Streets. The configuration of the layout particularly as it relates to the creation of an urban edge along Cookstown Road to First Avenue should be given further consideration. Further consideration and/or justification of the documents as they relate to the proposed ground floor element of the scheme in terms of possible provision of commercial uses and the creation of an active streetscape. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.
3. Further consideration and/or justification of the documents as they relate to the internal layout of the proposed development, having particular regard to the provision of resident support facilities and amenities and their location within the overall development, having regard to the provisions 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 further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

The Opinion notification pursuant to article 285(5)(b) also referred to specific information that should be submitted with any application as follows:

1. A Design Statement addressing the criteria contained within section 11.2.4 of the South Dublin County Development Plan 2016 in relation to development within regeneration zones, and which includes, *inter alia*, justification outlining how the proposal would not give rise to an isolated piecemeal pocket of residential development that is disconnected from shops, amenities and/or other residences

2. 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)
3. 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
4. Construction and Demolition Waste Management Plan
5. Details of any measures required to prevent interference with aviation, in particular the use of the helipad at the hospital at Tallaght.
6. Landscaping proposals including an overall landscaping masterplan for the development site. Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including boundary treatments should be submitted. Proposals relating to improving accessibility for vulnerable road users into/out of site and in accessing surrounding area should also be submitted.

5.3. Applicant’s Statement

The applicant has submitted a statement of response to ABP Opinion’s which is briefly summarised as follows:

Item 1

Relationship of site with other REGEN lands within the overall area.

Response

The planning report details compliance with the wider zoning objectives. The development site is strategically located in close proximity to employment uses and excellent public transport links and has been designed to allow for links to adjoining sites, should that be required, safe pedestrian access to services and facilities, and provides a high-quality design solution. Cookstown industrial estate has already begun its transition towards a residential and mixed land-use. Further to the Opinion, the layout of the proposed development now allows for pedestrian and cycle integration with the adjoining development sites should they be brought forward in the short, medium or long term. Future pedestrian permeability has been prioritised in the redesigned scheme. The height has been revised from 5 to 6 and part 8 storey acknowledging it appears to contravene the CDP a statement of material contravention has been submitted. Further consideration has been given to design with 4 no. blocks now proposed access the site.

Item 2

Permeability and Connections

Response

The layout has been modified to allow for increased potential connectivity to adjoining sites that will, in the future, transition from industrial lands to uses permissible under the REGEN zoning pertaining to the Cookstown area.

Item 3

Internal Layout

Response

A breakdown of facilities and amenities provided in each of the blocks is set out in the response.

With regard to the specific additional information required, the applicant has submitted/ responded as follows:

- A detailed design statement has been submitted including an urban design study. It is set out that the site is conveniently located near facilities.
- Legal Covenants are provided.
- Daylight/sunlight analysis is submitted which sets out sufficient access to sunlight for future residents is achieved.
- An outline construction and demolition waste development plan is submitted.
- Reference is made to correspondence on file between the Irish Aviation Authority and the Department of Defence.
- Details of landscaping proposals are submitted. The final layout shall incorporate features that benefit vulnerable road users by encouraging low vehicle speeds.

6.0 Relevant Planning Policy

6.1. Project Ireland 2040 – National Planning Framework

The NPF includes a Chapter, No. 6 entitled 'People, Homes and Communities'. It sets out that place is intrinsic to achieving good quality of life. A number of key policy objectives are noted as follows:

National Planning Objective 13 provides that “in urban areas, planning and related standards, including in particular, 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 Objective 33 seeks to “prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location”.

National Policy Objective 35 seeks “to increase residential density in settlements, through a range of measures including restrictions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights”.

6.2. Section 28 Ministerial Guidelines

The following is a list of section 28 Ministerial Guidelines considered of relevance to the proposed development. Specific policies and objectives are referenced within the assessment where appropriate.

- ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ (including the associated ‘Urban Design Manual’)
- ‘Design Manual for Urban Roads and Streets’ (DMURS)
- ‘The Planning System and Flood Risk Management’ (including the associated ‘Technical Appendices’)
- ‘Childcare Facilities – Guidelines for Planning Authorities’
- ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’ 2018
- ‘Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment’, August 2018.
- Urban Development and Building Height, Guidelines for Planning Authorities, 2018.

Other relevant guidelines include:

- Rebuilding Ireland: Action for Homelessness
- Guidelines for Planning Authority, Appropriate Assessment, NPWS
- Framework and Principles for the Protection of the Archaeological Heritage Department of Arts, Heritage, Gaeltacht and the Islands 1999.

6.3. Local Planning Policy

The South Dublin County Development Plan 2016-2022 is the operative County Development Plan.

Zoning:

‘Objective REGEN’ which seeks to ‘facilitate enterprise and/or residential-led regeneration’

Residential and restaurant/cafe development is ‘permitted in principle’

SDCC Vision

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

11.2.4 Regeneration Zone

Development proposals in REGEN zones should address the following criteria:

- (1) Demonstrate a clear transition towards a more urban form of development and a traditional street network. Address connectivity and linkages in the area and demonstrate that the development of the site would not give rise to isolated piecemeal pockets of residential development that are disconnected from shops, amenities and/or residences.

The Tallaght Town Centre LAP 2006-2016 has expired and the Planning Authority are stated to be engaged in drafting a new LAP for Tallaght Town Centre.

6.4 Applicant’s Statement of Consistency

The applicant has submitted a statement of consistency with relevant policy required under Section 8(1)(iv) of the Act which provides, *inter alia*:

- The proposal will deliver on the objectives of the NPF.

- Low-density housing development and underused sites have been a feature of Ireland's housing landscape and to avoid urban sprawl increased residential densities are required in the urban areas.
- The proposal for a high density mixed tenure development at this highly accessible location is consistent with the NPF for 2040 and the Regional Planning Guidelines.
- A response is set out in respect of each of the 12 criteria in the Urban Design Manual.
- It is submitted that the proposal is supportive of the objectives of the Sustainable Urban Housing, Guidelines for Planning Authorities, the Urban Design Manual and DMURS.
- No crèche is proposed and a rationale for such is provided.
- With regard to the Sustainable Urban Housing: Design Standards for Apartments, it is set out that the site is considered a 'central and/or accessible urban location'.
- With regards to SPPR 4 the proposal consists of 59% of dual aspect units for the BTR block 1 and 58% for BTR blocks 2 and 3. The ground floor, floor to ceiling heights are achieved.
- A legal covenant is provided with regard to the BTR units.
- A full housing quality assessment has been submitted
- With regards to car parking, 64 no. spaces are proposed all at grade. This is considered appropriate given the intended profile and most will walk to the local centres of employment, or education and will avail of the excellent public transport network.
- Notwithstanding that there is no need to comply with SPPR 8 (iv) the development complies with it.
- With regards to the shared accommodation, the young professionals in Tallaght hospital or Tallaght IT are amongst the key groups that find this concept attractive.

- With regards SPPR 9 all units are 16sq.m. and exceed the recommended minimum bedroom sizes. A range of support and amenity facilities will be available to residents.
- A building life cycle report is submitted
- Details of local policy objectives are outlined
- A contextual map indicating adjoining facilities is submitted. Vacant sites are also indicated.
- Regarding the transitional nature of regeneration zones, the design has been adapted accordingly to include buffering of the open space and improving the performance of the building envelope. It was not considered necessary to instruct a noise assessment in this instance.
- It is concluded that the statement of consistency has identified the compliance of the scheme with relevant strategic planning policy documentation.

7.0 Observer Submissions

A total of 4 no. observations were received in respect of the proposed development. A brief summary of each submission received is set out hereunder:

1 Cllr Charlie O'Connor

- Objects to development.
- Height will impact on other local buildings
- Concerns regarding density
- Will not provide for sustainable community
- Excessive number of smaller apartments and a lack of larger apartments and houses
- Lack of green space and biodiversity
- Height raises concerns about fire safety
- Distinct lack of iconic innovation or interesting design in the application.

- Proposal puts huge strain on local services and facilities including school places
- Proposal will create much strain on the local road network

2. Colm Brophy T.D.

- Object to proposed density
- This current application does not cater for family living desperately needed in Tallaght area
- Size and height is not in keeping with conventional housing nearby
- Overdevelopment, which in the long term will be damaging to both existing and the new community created is never acceptable

3. Gerard Stockil – Voluntary Chair, Tallaght Community Council

- Requests that the proposal is rejected as it contravenes the SDCC Development Plan and includes an unproven “shared living” model for Tallaght without evidencing a local housing demand / need for this model.
- Concerns raised about apartment sizes, lack of housing mix, fire safety and the risk of excessive BTR schemes in such a condensed area.
- Reference is made to the lapsed LAP and lack of public consultation regarding applications in the area.
- Proposed mix of dwellings does not match the socio-economic demand. Larger apartments with access to private gardens are needed.
- Reference is made to the permitted SHD whereby a consultant’s housing report was submitted for Tallaght and the disparity between demand and the proposed supply from these SHDs.
- All SHD applications to date have been on REGEN lands. Zoning is flawed and has not delivered regeneration – just a glut of apartment only developments replacing enterprise /employment

- Distinct lack of any iconic, innovation or interesting design
- Concerns regarding fire safety
- Concerns about apartment sizes and the creation of an excess of small housing units
- Conflicts with LAP and CDP regarding tenure mix. Concerns about the excess BTR units.
- Is the location really suitable for shared-living. While the development is located near a hospital, will staff choose a location in the middle of an older industrial estate?
- This new living model needs a critical view and some negative feedback from HMO's in the UK are set out in the submission to counter balance the positive aspects presented by applicant
- Lack of ambition regarding the formation of civic spaces. There is no overall plan to create something new. It is ad-hoc development and does not show a coordinated or strategic plan for the whole REGEN zone.
- Application contravenes the development plan regarding building heights policy.
- The potential mix of lands based on the range of uses listed as permissible and open for consideration is not being achieved by this application. It is submitted that the spirit and intention of the regeneration zoning objective is not being implemented in full.
- Minimal element of employment uses proposed as part of this development and would not generate meaningful enterprise or employment creation to qualify as having a regeneration or evolutionary impact.
- Architectural design is monotone in nature and finished in materials that will decay overtime resulting in an urban form that does not positively contribute to the visual aesthetics in Tallaght.
- The quality and functionality of the open space does not deliver a good standard of residential amenity for future occupants.
- Proposal premature pending adoption of the LAP.

- Emphasis on the references in CDP/LAP regarding public participation.
- It is acknowledged that the site is in an area proximate to Tallaght Town centre and the Luas light rail however it is also noted that the REGEN zoning objective provides for more intensive enterprise uses as well as residential
- Approx. 40ha of land have been rezoned to REGEN in the Cookstown Industrial estate. Scale of lands would justify designation as SDZ.
- The approach for ad hoc residential development in an industrial estate would not foster the creation of new communities and integration with existing communities.

4. Belgard Residents' Association

- Pattern has emerged where developers have shown clear intent on flooding Cookstown industrial estate with small build to rent apartments in blocks up to ten-storey with little or no provision for enterprise.
- In the absence of an LAP, there is no vision or masterplan for the county town with beginnings of developer-led, ad-hoc development in the town centre
- Notable absence of enterprise or employment uses with retail units at street levels.
- Density is concerning and family housing virtually non-existent
- Height is completely out of character
- Tallaght needs a coherent and ambitious plan that has the potential to form a vibrant and thriving community with an influx of new people living and working locally. Requested that permission is refused.

8.0 Planning Authority Submission

8.1. Overview

The planning authority, South Dublin County Council has made a submission which was received by ABP 9th May 2019. The report notes pre-planning consultations in the area and summarises the submissions received in respect of the application.

8.2 Summary of Views of Elected Members

A synopsis of the comments/views in respect of the proposed development is set out as follows:

- Significant developments progressing without a LAP. Concerns that the zoning is flawed.
- Concerns re traffic and likely congestion on the local road network
- Concerns regarding density
- Concerns re lack of open space and capacity of schools
- Lack of uses demonstrates a lack of commitment to providing additional facilities for the area
- Design is unambitious

8.3 Planning Analysis

The report which sets out the principle planning considerations and response to issues raised is summarised as follows:

- Site is zoned 'REGEN' to facilitate enterprise and/or residential-led regeneration and site is within the land incorporated within the unpublished Draft Tallaght LAP.
- The expired LAP should be used as a reference point in conjunction with the CDP and the recently published national policy and guidance documents.
- The site is somewhat removed from supporting retail facilities at the present time, the proposed development now provides for a retail/café unit of 92sq.m.

- Whilst it is recognised that the site is somewhat removed from supporting retail facilities, the land use objective for the area is for residential/enterprise regeneration. The proposal must strike a balance between delivering a viable development whilst also meeting the needs of residents. The proposed uses are acceptable
- The principle of re-developing the site to a higher density is acceptable.
- The draft LAP will be on public display in summer of 2019. The unpublished draft LAP sets the maximum heights for this site at 4-6 storeys along the road frontage to the east of the site only. The maximum height on commercial blocks for the road frontage (eastern side only) of this site is 3-5 storeys. It is recommended that a condition be imposed restricting the height of the perimeter blocks along the road frontages to the north and east to be no taller than 6 storeys.
- A reduction in height would go some way to achieving a more sustainable plot ratio.
- There would be no significant detrimental impact on nearby dwellings in terms of residential or visual amenity.
- CDP emphasises urban design within regeneration areas and includes demonstrating that the development of the site would not give rise to piecemeal development, disconnected from shops and amenities.
- The scale of the development delivers a robust building line which would define the future urban environment whilst creating the potential for defended spaces for residents within the development.
- The approach provides a strong edge to the adjoining public roads and for future developments to reflect.
- Vehicular access is provided only from First Avenue.
- Pedestrians can move into the site from Cookstown Road and First Avenue.
- The improvements to the locations of various uses collectively seek to engage with the public roads and public realm whilst creating protected public and communal spaces within the development.

- It is considered that the proposed balconies help to provide passive surveillance to the adjacent roads within the industrial estate. Overall the elevations are relatively well-considered.
- The palette of materials achieves an overall cohesive design.
- It would be beneficial to provide analysis of the most appropriate unit mix for the Cookstown area.
- The mix is generally considered consistent with national guidance.
- Having regard to the fact that the site is located wholly within an industrial estate, the public realm is that associated with an industrial/warehouse location.
- Overall considering the proposal is an early stage in the regeneration of an industrial estate, it is considered that the proposal resolves the need to provide a robust urban development which responds appropriately to the surrounding industrial area, with the need to enable integration with future neighbouring development to create a quality urban environment within Cookstown.
- Adequate open space is provided. Whilst the public open space is acceptable, the proposed communal open space is not considered to be of a good quality.
- The majority of communal amenity open space is located between the proposed blocks and the perimeter of the site. It is acknowledged that the shared living block will have access to a dedicated communal open space in the form of a south facing terraced courtyard adjacent the proposed public open space. Other spaces proposed within the development are generally leftover/incidental spaces.
- Whilst the long-term land use objective for the area is enterprise-led or residential-led regeneration, it is considered that ahead of such redevelopment the proposed communal open spaces will not be of a good quality. The preferred approach would be to locate the majority of communal open space within the central area created by perimeter blocks.
- Overall the majority of communal open space proposed is not considered to be of a good quality. However, having regard to the quantum proposed and

the land use objective for redevelopment of the adjacent sites, it is considered that the proposed communal spaces meet the requirements, subject to Parks conditions in relation to detailed design.

- A toddler's play area is proposed. Having regard to the mix of units proposed and the block layout, the approach of splitting the play areas and locating them within the communal areas is in principle acceptable.
- Applicant has not demonstrated the overall quality of the facilities provided in respect of the shared accommodation and it is considered that the proposal falls short of the requirements for common shared area for living and kitchen facilities and for private amenity spaces set out in the Guidelines.
- A condition should be attached which requires the applicant to submit amended plans and particulars which demonstrate that the proposed shared living element of the development meets the minima for common living and kitchen facilities and private amenity space set out in the Apartment Guidelines.
- Roads Department has raised significant concerns regarding level of parking to be provided.
- No childcare facilities are proposed. A crèche facilities assessment is submitted and the applicant disregards the 222 shared living units, 57 one bed units and the 4 no. 2 bed apartments contributing to childcare demand.
- Not providing formal childcare in this instance is acceptable.
- A condition should be attached requiring direct consultations with stakeholders in relation to potential hazards for air traffic during construction and operational phases.
- It is concluded that the development subject to 37 no. conditions would be generally consistent with national and local policies.

8.4 Inter-Departmental reports

8.4.1 Parks and Landscape Services

This department recommends 12 no. conditions to be attached to any grant of permission. A tree bond is recommended.

8.4.2 Environmental Services Planning report with respect to Project C & D Waste Management Plan

A project construction and demolition waste management plan must be prepared for this proposed development. No objection subject to condition of producing site specific C & D waste management plan.

8.4.3 Water Services Planning report

No objection subject to conditions

8.4.4 Roads Department

Concerns that the significant under provision of car parking may result in parking and traffic issues both within the development and on the surrounding public road network. The immediate surrounding area and road network is industrial in nature and does not provide adequate walking or cycling infrastructure at present. The Roads Department consider that the parking provision is not sustainable and does not mitigate against future potential changes of residential use/market within the development. Conditions are provided should permission be granted.

8.4.5 Housing Procurement Section

Part V condition should be attached to any grant of permission

9.0 Prescribed Bodies

9.1 Transport Infrastructure Ireland

No observations to make

10.0 Environmental Impact Assessment

- 10.1 The applicant has addressed the issue of Environmental Impact Assessment (EIA) within the application documentation. The applicant states that the proposed development is considered to be sub-threshold in terms of EIA having regard to Schedule 5, Part 2, 10(b) (i) and (iv) of the Planning and Development Regulations 2001-2017. The development comprises of 150 no. residential units and 222 shared bed-spaces. It is not a large-scale project and there are no apparent characteristics or elements of the design of the scheme that are likely to cause significant effects on the environment.
- 10.2 The proposed development would be located on brownfield lands that are zoned and serviced. The site is not designated for the protection of a landscape or of natural or cultural heritage. The proposed development is not likely to have a significant effect on any Natura 2000 site (as per findings of section 11 of this assessment).
- 10.3 Having regard to:
- (a) the nature and scale of the proposed development, on zoned lands served by public infrastructure,
 - (b) the absence of any significant environmental sensitivities in the area,
 - (c) the location of the development outside of any sensitive location specified in article 109(3) of the Planning and Development Regulations 2001 (as amended),

It is concluded that, by reason of the nature, scale and location of the subject site, the proposed development would not be likely to have significant effects on the environment. It is, therefore, considered that an environmental impact assessment report for the proposed development is not necessary in this case.

11.0 Assessment

Pursuant to site inspection and inspection of the surrounding environs, examination of all documentation, plans and particulars and submissions/observations on file, the following are the relevant planning considerations of this application:

- Zoning

- Local Area Plan
- Height
- Urban Design including site context and connections
- Build to Rent
- Shared Accommodation
- Residential Amenity
- Other Issues
- Appropriate Assessment

11.1 **Zoning**

11.1.1 The site in question is zoned 'REGEN - To facilitate enterprise and/or residential led regeneration' in the South Dublin County Development Plan 2016-2022. Residential use is a permissible use. It is also proposed to provide a commercial component to this development consisting of a café of 92sq.m. The zoning matrix in the Development Plan indicates that residential use, childcare facilities, restaurant/café, shop-local are permitted in principle. Shops – Neighbourhood are 'open for consideration'.

11.1.2 The Planning and Development (Housing) and Residential Tenancies Act of 2016 provides that other uses on the land, the zoning of which facilitates such use, can be included but only if the cumulative gross floor area of the houses comprise not less than 85% of the gross floor space of the proposed development and that the other uses cumulatively do not exceed 15sq.m. gross floor space for each house subject to a maximum of 4,500sq.m. gross floor space for such other uses in any development. The proposed development is consistent with the land use zoning objectives set out in the South Dublin County Development Plan 2016-2022 and the provisions of the Planning and Development Act of 2016 as amended in respect of strategic housing applications. However, the qualitative nature of the proposed residential development needs to be assessed in more detail having regard in particular to the immediate environment in which it would be located.

11.2 Local Area Plan

11.2.1 The most recent Tallaght LAP 2011-2017 has expired and it was proposed as part of the County Development Plan 2016-2022 to prepare a new one. The development site falls within the Cookstown North precinct of the LAP, the northern edge of the estate and the lands were zoned 'Objective E – to provide for Enterprise, Employment and Related Uses'. The LAP indicates that pedestrian activity is low and permeability is very limited. The lands in question were re-zoned in the South Dublin CDP 2016 to REGEN.

11.2.2 The PA has indicated in the Chief Executive's report that it is progressing the preparation of a draft LAP for Tallaght and expects the plan to be placed on public display in the summer of 2019. While it is unfortunate that a LAP is not in place, it is not reasonable to hold up development on lands specifically zoned for regeneration in anticipation of an adopted Plan and in this regard, I do not consider that the proposal could be determined to be premature on the basis of the absence of a LAP. It is also unfortunate that no masterplan or phasing proposals were prepared for the 'REGEN' lands given the extent of lands involved. However, I do consider that section 11.2.4 of the CDP in respect of the REGEN lands provides some guidance regarding the sequential release of REGEN lands and is examined in more detail in the urban design, locational context and connections section of this report.

11.3.0 Height

11.3.1 With regards to height, many of the observers raised this as a concern. The overall development ranges from 5 to 8 stories with the taller of the structures fronting the local road network i.e. junction of First Avenue and Cookstown Road. The planning authority indicates that the draft LAP is expected to be on display in the summer of 2019. The Chief Executive's report sets out that the unpublished LAP sets the maximum heights for this site at 4-6 storeys for residential along the road frontage to the east of the site only. The maximum height on commercial blocks for the road frontage (eastern side only) of this site is 3-5 storeys. The PA recommend that a condition be imposed restricting the height of the perimeter blocks along the road frontages to the north and east to no taller than 6 storeys.

11.3.2 The LAP while expired provides details on the potential sites for landmark buildings under section 5.2.4. Performance criteria is set out in the LAP as to where such structures will be considered. Map 5.2.3 identifies sites for potential landmarks and while the site in question is not identified as a landmark or gateway site, I do consider that having regard to national policy in particular the provisions of the Urban Development and Building Heights Guidelines that increased height is appropriate in or close to transport corridors and town centres. However, due regard should be given to the site context.

11.4.0 Urban Design including site context and connectivity

11.4.1 The Urban Design Manual – A Best Practice Guide which is a companion document to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, uses 12 criteria that are designed to encapsulate the range of design considerations for residential development. The Urban Design: New Apartment Guidelines for Planning Authorities, 2018 also provides relevant standards both in quantitative and qualitative terms. The ABP Opinion that issued required further consideration of *inter alia*, the design of the proposed development and further consideration of the documents as they related to the proposed ground floor element of the scheme in terms of possible provision of commercial uses and the creation of an active streetscape. The revisions now provide for the communal living block to be located in the north-east corner of the site overlooking the roundabout junction of Cookstown and First Avenue. The documentation submitted indicates that this is to be the landmark building, the focal point in a drab, low rise brownfield environment. In general, I consider that the layout of the overall scheme is acceptable subject to achieving qualitative standards particularly sunlight and daylight standards. The café use has been provided where it would be the focal point of the development helping to create a more vibrant street scape at this location.

11.4.2 The documentation submitted indicates that addressing the lack of connectivity in Cookstown Industrial Estate will be a gradual process, particularly given the

fragmented pattern of land ownership which entails improvements being carried out in an incremental fashion. While reference is made to some of the more significant proposals contained in the CDP to address the issue of connectivity such as a recent Part 8 in respect of the Belgard Square/ Cookstown estate link road scheme, the fact is that current linkages to the town centre are indirect due to the layout of the roads in the industrial estate; a fact which the applicant accepts in the documentation submitted. Notwithstanding the existing permitted developments in the area and any improvements they will provide in terms of connections, I consider that the site remains detached from the town centre lands with poor pedestrian routes. In order to ensure that residential developments create sustainable and vibrant communities, the key is successful transformation of neighbourhoods into permeable ones where people can walk and cycle safely and conveniently to shops, local services and other such social and recreational facilities thus promoting social interaction in the neighbourhood. The absence of other residential uses or night time uses and indeed on-street frontage (due to the industrial nature of the site) that generate movements reduces passive surveillance in the general area which in turn reduces the attractiveness of the area for pedestrians. The footpaths in the general area are less than 2m in width with steep gradients changes in places. Public lighting is also considered poor and is provided on one side of the road only although additional lighting was noted at roundabout junctions within the estate.

11.4.3 Section 11.2.4 of the CDP provides that any development proposals in REGEN zones should address, *inter alia*, connectivity and linkages in the area and demonstrate that the development of the site would not give rise to isolated piecemeal pockets of residential development that are disconnected from shops, amenities and/or residences. The proposed development would, in my opinion, result in an isolated residential development within the industrial estate surrounded by existing industrial sites that may take a significant length of time to be redeveloped or indeed may never be redeveloped. The scale and pattern of the proposed development in this location at this time is, in my opinion, contrary to the proper planning and sustainable development of the area. The 'REGEN' lands

should be redeveloped in a logical and coherent manner so as to underpin the creation of strong, vibrant and sustainable communities. In this regard, the proposed density should also be considered having regard to the detached nature of the site from any social/recreational amenities in the immediate area. While the density is considered appropriate having regard to the general proximity of the Luas and town centre lands, the location of a residential population within an industrial estate in the absence of any meaningful presence of public open spaces and other social/recreational amenities without having to travel through the industrial lands is, in my opinion, unacceptable and would result in poor residential amenities for future occupants.

11.5.0 Build to Rent and Shared Accommodation

11.5.1 Section 5 of the Sustainable Urban Housing: Design Standards for New Apartments, 2018 provides guidance on Build-to-Rent (B2R) and Shared Accommodation sectors. The guidelines define B2R as “purpose built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord”. These schemes have specific distinct characteristics which are of relevance to the planning assessment. The ownership and management of such a scheme is usually carried out by a single entity. In principle, I have no objection to the proposal for a B2R scheme at this location however consider that the locational attributes as discussed heretofore remain. The public notices refer to the scheme as ‘Build-to-Rent’ and a draft Agreement Pursuant to section 47 of the Planning and Development Act, 2000 as amended has been submitted.

11.5.2 SPPR 8 sets out proposals that qualify as specific BTR development in accordance with SPPR 7. In this regard, no restrictions on dwelling mix apply. Flexibility also applies in relation to the provision of a proportion of the storage and private amenity spaces associated with individual units as set out in Appendix 1 and in relation to the provision 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. While there is flexibility regarding unit mix, there is no flexibility regarding the unit sizes. I note that a Housing Quality Assessment

Schedule has been submitted and that the size of the one bed units is generally set out as 45.3sq.m. however I consider the floor areas to be generally 43.4sq.m. which below the minimum floor areas set out in the 2018 guidelines. I also note that the aggregate floor area of living/dining/kitchen area for the one and two bed units falls below the respective 23sq.m. and 30sq.m. standards in all cases, albeit on a marginal basis. Appendix 1 of the Guidelines provides for a 5% variation which can be applied to room areas and widths subject to overall compliance with required minimum overall apartment floor areas. Given that the overall floor areas are not met, I consider that the variance cannot apply in this instance. While the shortfall could be considered minimal, it has to be considered in the wider context having regard in particular to the locational attributes of the site and the need in this instance for a development of a higher standard given the absence of public open space/realm which could compensate for the shortfall in floor areas. Furthermore, while the guidelines provide minimum quantitative standards these should not become the target for developers to meet while simultaneously proposing increased densities rather the focus should be on the qualitative aspect of any development with a focus on providing higher quantitative standards having regard in particular to the densities proposed.

11.6.0 Shared Accommodation

11.6.1 222 no. bedspaces are proposed as shared accommodation. Specific Planning Policy Requirement 9 sets out that:

Shared Accommodation may be provided and shall be subject to the requirements of SPPRs 7 (as per BTR). In addition,

- (i) No restrictions on dwelling mix shall apply;
- (ii) The overall unit, floor area and bedroom floorspace requirements of Appendix 1 of these Guidelines shall not apply and are replaced by Tables 5a and 5b;
- (iii) Flexibility shall be applied in relation to the provision of all storage and amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities. 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;

(iv) A default policy of minimal car parking provision shall apply on the basis of shared accommodation development being more suitable for central locations and/or proximity to public transport services. The requirement for shared accommodation to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures.

11.6.2 A socio-economic potential of shared living accommodation report has been submitted. I also note documentation submitted in support of the co-living/shared accommodation format and the design-led approach to this new concept is to promote community and social interaction. This concept is critical to the success of any shared living format. Conclusions of the report submitted indicate that a key determinant for shared accommodation is location, particularly proximity to work, amenities and public transport. In this instance, while the site is within 1km of Tallaght town centre, access to same requires walking through an industrial estate which would in my opinion detract from the residential amenities of this particular scheme. The lack of any adjoining residential/social/recreational amenities immediately adjacent the site would promote an insular type development detached from the wider community which runs counter to the determinants for choosing co-living.

11.6.3 Having regard to the provisions of SPPR9, I draw attention to that the fact that 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. Having regard to the isolated nature of the site surrounded by existing industrial units within an established industrial estate, notwithstanding the zoning objective to promote regeneration within the area, I am not satisfied that the applicant has demonstrated that the proposal provides an enhanced level of amenities for future occupants. This matter is assessed further hereunder.

11.6.4 Section 5.13 of the Apartment Guidelines 2018 refers to a new format of residential accommodation described as “shared accommodation”. One format of shared accommodation which is proposed by these guidelines is a residential unit comprising of 2-6 bedrooms of single and/or double occupancy with a common shared area within the residential unit for living and kitchen facilities. Each of the provided bedrooms is required to be ensuite and to be of a floorspace size per Table 5a below. The minimum floorspace extent of the common shared area for living and kitchen facilities will be calculated on a per bedroom basis per Table 5a.

Table 5a: Shared Accommodation – minimum bedroom size

Single* 12m²

Double/twin* 18m²

*Including ensuite

Table 5b: Shared Accommodation – minimum common living and kitchen facilities floor area

Bedrooms 1-3 8m² per person

Bedrooms 4-6 Additional 4m² per person

11.6.5 The Guidelines appear to only make reference to one type/format of shared accommodation i.e. shared accommodation units would have a maximum occupancy of 8 persons calculated on the single or double occupancy of the bedrooms provided i.e. 8 persons occupancy. The plans before the Board propose 40 rooms on each floor with only one communal kitchen/living/dining area of 122sq.m. Additional library/quiet space is provided at c. 37sq.m. If the same standards are to be applied to the proposed format as that set out in the Table above, there is a requirement for a common living and kitchen facility floor area of 172sqm. required on each floor. There is a shortfall of 50sq.m. on each floor. Having regard to the number of people using this one space, it is questionable as to whether a smaller kitchen/living area should be introduced on some floors to

provide a greater choice for future tenants. There is a communal lounge/social space located at ground floor which comprises of two separate areas of c. 248sq.m. and 73.5sq.m. respectively. However, I consider that this is space that should be provided as per section 5.17 of the Apartment Guidelines so as to ensure wider recreation and leisure amenities as part of the overall development. Therefore, I consider that there is a shortfall in the common living and kitchen facilities on each floor.

11.6.6 The Guidelines also refer to the need for such a type of accommodation and the prevailing context of the proposed site shall be considered, with city centres being the appropriate locations for such developments. The site in question is not city centre or even town centre. The site is located within an industrial estate unlike other SHD applications in the general areas which have been either on the periphery of the estate opposite public transport routes or immediately adjacent to town centre lands. Cookstown industrial estate is an old estate with a concentration of industrial/warehouse type uses in the immediate vicinity of the development site. There are no residential amenities immediately abutting or adjacent to the site. Residents would be required to walk through an existing poorly lit industrial area which would have poor passive surveillance at night so as to access social or recreational amenities located closer to the town centre. The documentation submitted refers to the “drab low-rise brownfield environment” in which the development site is located and while the development itself may represent a more aesthetically pleasing development to that which exists and act as a catalyst for further redevelopment in the immediate, the existing environment is not in my opinion conducive for residential living and the proposal for shared accommodation at this location is at odds with the apartment guidelines which clearly direct shared accommodation to city and town centre locations. As the industrial lands redevelop outwards from the town centre or from the periphery inwards towards the development site, the environment will change and should become more conducive for residential uses.

11.7.0 Residential Amenity

11.7.1 A daylighting and suncast report has been submitted. I would have concerns about the findings in respect of the daylight factor results indicating that 25 of the B2R units and 1 shared living unit fall below the threshold. The report does not detail which

units are above or below the criteria on each floor within each block and more importantly, there is no detail provided as to the how far below the threshold the daylight factor is. This is unacceptable and brings into question the qualitative standards of the overall development. I also note that the threshold of 1.5% has been used for living rooms, however the more appropriate threshold would be 2% given that the kitchen areas are communal. Section 6.7 of the Apartment Guidelines provides that “where an applicant cannot fully meet all of the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out....” No such details are submitted. In the absence of such details, the qualitative aspect in terms of sunlight/daylight to units within the overall development is questionable. This combined with the locational attributes of the site and shortfall in floor areas associated with the residential units would result in a substandard form of residential development where both national and local planning guidance seek to ensure the delivery of increasingly attractive and desirable housing options.

11.8 Other Issues

11.8.1 Infrastructural Services

An engineering services and flood risk assessment report has been submitted with the application. A water services planning report raised no objection to the development subject to conditions.

11.8.2 Childcare Facility

A childcare facility is not proposed as part of the development. A crèche facilities assessment report has been submitted and indicates that there are 12 facilities available within a 1.5km of the subject site. Only 12 spaces have been identified as available however the report sets out reference to extant permissions for childcare facilities in the area. I am satisfied having regard to the permitted developments in the general area and the housing model proposed in this application that a childcare facility is not required.

11.8.3 Part V

Details in respect of Part V have been submitted and a condition should be attached in respect of Part V.

11.8.4 Aviation Considerations

I note correspondence on file which refers to the observations from Air Traffic Control Services at Casement Aerodrome who have no issue in respect of obstacle limitation surfaces for Casement Aerodrome. The Defence Forces require the erecting and operation of cranes at the site to be coordinated with Air Corps Air Traffic Services no later than 28 days before use. It is set out that there is a requirement to engage with the ground team at Tallaght hospital who operate the Helipad. The application was referred to the IAA and the Department of Defence and no observation has been received. I am satisfied that the proposal would not encroach into the Inner Horizontal Surface area.

11.8.5 Duration of Permission

I note that reference is made in the 'Engineering Solutions' report on 'Daylighting and Suncast report' that the proposal is for a 10-year permission. The public notices do not refer to a 10-year permission and in any event, having regard to the nature of the development proposed, I consider that the 5 year permission is appropriate. A condition should be attached if a grant of permission is considered to clarify the duration of this permission.

11.9 Appropriate Assessment

Screening report

11.9.1 The applicant has submitted an AA screening report. The screening report sets out that given the scale of the proposed works and their distance from any European sites, there is no potential for significant effects on any of the European sites considered and therefore potential effects on European sites can be excluded at pre-screening stage.

11.9.2 Identification of sites

Table 3: Natura 2000 sites within 15km range of site

Natura 2000 Code	Site Code	Distance to site (as crow flies)	Qualifying Interests
Glenasmole Valley SAC	001209	3.9km south of site	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410] Petrifying springs with tufa formation (Cratoneurion) [7220]
South Dublin Bay SAC	000210	12km east of site	Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Embryonic shifting dunes [2110]
South Dublin Bay and River Tolka Estuary SPA	004024	12km east of site	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Ringed Plover (<i>Charadrius hiaticula</i>) [A137] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144]

			<p>Dunlin (<i>Calidris alpina</i>) [A149]</p> <p>Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]</p> <p>Redshank (<i>Tringa totanus</i>) [A162]</p> <p>Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]</p> <p>Roseate Tern (<i>Sterna dougallii</i>) [A192]</p> <p>Common Tern (<i>Sterna hirundo</i>) [A193]</p> <p>Arctic Tern (<i>Sterna paradisaea</i>) [A194]</p> <p>Wetland and Waterbirds [A999]</p>
Wicklow Mountains SAC	002122	c. 6.4km south east of the site	<p>Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110]</p> <p>Natural dystrophic lakes and ponds [3160]</p> <p>Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]</p> <p>European dry heaths [4030]</p> <p>Alpine and Boreal heaths [4060]</p> <p>Calaminarian grasslands of the <i>Violetalia calaminariae</i> [6130]</p> <p>Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230]</p> <p>Blanket bogs (* if active bog) [7130]</p> <p>Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110]</p> <p>Calcareous rocky slopes with chasmophytic vegetation [8210]</p> <p>Siliceous rocky slopes with chasmophytic vegetation [8220]</p> <p>Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0]</p> <p><i>Lutra lutra</i> (Otter) [1355]</p>

Wicklow Mountains SPA	004040	c. 8.3km	Merlin (<i>Falco columbarius</i>) [A098] Peregrine (<i>Falco peregrinus</i>) [A103]
Rye Water Valley/Cartron SAC	001398	c.10.5km	Petrifying springs with tufa formation (Cratoneurion) [7220] Vertigo angustior (Narrow-mouthed Whorl Snail) [1014] Vertigo moulinsiana (Desmoulin's Whorl Snail) [1016]
Knocksink Wood SAC	000725	c.14.2km	Petrifying springs with tufa formation (Cratoneurion) [7220] Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) [91E0]
Poulaphouca Reservoir SPA	004063	c.14.8km	Greylag Goose (<i>Anser anser</i>) [A043] Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183]
North Bull Island SPA	004006	c. 14.9km	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Shelduck (<i>Tadorna tadorna</i>) [A048] Teal (<i>Anas crecca</i>) [A052] Pintail (<i>Anas acuta</i>) [A054] Shoveler (<i>Anas clypeata</i>) [A056] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144]

			Dunlin (<i>Calidris alpina</i>) [A149] Black-tailed Godwit (<i>Limosa limosa</i>) [A156] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Curlew (<i>Numenius arquata</i>) [A160] Redshank (<i>Tringa totanus</i>) [A162] Turnstone (<i>Arenaria interpres</i>) [A169] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Wetland and Waterbirds [A999]
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Site synopsis and conservation objectives for each of these Natura 2000 sites are available on the NPWS website. In particular the attributes and targets of these sites are of assistance in screening for AA in respect of this project. Of note while the applicant considered the North Dublin Bay SAC to be within 15km of the site, I consider it to be in excess of 15km and having regard to the source-pathway-receptor model excluded the site.

11.9.3 Assessment of likely Significant Effects on Designated Sites

The potential for likely significant effects should be assessed in the context of the relevant sites' conservation objectives. The development site in question is not part of or located adjacent to any of the designated sites. Having regard to the 'source-pathway-receptor' model and lack of any direct entry of surface and untreated waste waters to any of the Natura 2000 sites, the use of best construction practices as an integral component of the development and the treatment of waste waters prior to discharge, the proposal either individually or in-combination with other plans or projects could not be considered to have likely significant effects in view of the sites' conservation objectives.

AA screening – Conclusion

11.9.4 I have had due regard to the screening submission by the applicant and the details available on the NPWS web-site in respect of the Natura 2000 sites identified as being within 15km radius of the development site, including the nature of the receiving environment and proximity to the nearest European site. I consider it is reasonable to conclude that on the basis of the information on the file which includes inter alia, AA screening report submitted by the applicant and all of the planning documentation, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on any European site, in view of the said sites' Conservation Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required.

12.0 Recommendation

I recommend that permission be **refused** for the proposed development for the following reasons and considerations.

13.0 Reasons and Considerations

1. Having regard to the location of the site within the established Cookstown Industrial estate, to the established built form, uses and character of the industrial estate particularly along First Avenue and Cookstown Way, it is considered that the proposed residential development would give rise to isolated piecemeal pockets of residential development that is disconnected from shops, amenities and or residential services and would be contrary to section 11.2.4 of the current South Dublin Development Plan 2016-2022 and would, therefore, be contrary to the proper planning and sustainable development of the area.
2. The proposed development by reason of inadequate details regarding sunlight and daylight analysis to the units and a rationale for any alternative, compensatory design solutions; a shortfall in the overall minimum floor areas

of the proposed residential units and minimum aggregate floor areas; and a shortfall in the common living and kitchen facilities for the shared accommodation, having regard to the provisions set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2018, in conjunction with the locational attributes of the proposed site within an established industrial estate surrounded by industrial type uses, would result in a substandard form of residential development detached from other social or recreational amenities to serve future occupants. The proposal would be contrary to national and local policies which seek to deliver attractive and desirable housing options in appropriate locations, would set an undesirable future precedent and as such would be contrary to the proper planning and sustainable development of the area.

Joanna Kelly
Senior Planning Inspector
4th June 2019