

RESPONSE TO AN BORD PLEANÁLA OPINION

In respect of

**PROPOSED MIXED USE RESIDENTIAL DEVELOPMENT AT A COMBINED
SITE LOCATED AT THE JUNCTION OF BELGARD SQUARE NORTH AND
BELGARD ROAD, TALLAGHT, DUBLIN 24**

Prepared on behalf of

ATLAS GP LIMITED
8-9 Hanover Street East,
Dublin 2,
D02 KX94

By

TOM PHILLIPS + ASSOCIATES
Town Planning Consultants
80 Harcourt Street
Dublin 2
D02 F449

in association with

O' Mahony Pike Architects

Brady Shipman Martin Landscape Architects

O'Connor Sutton Cronin Consulting Engineers

JV Tierney Consulting Engineers

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1.0 INTRODUCTION

This Response Report addresses issues raised by An Bord Pleanála (ABP) and *South Dublin County Council (SDCC)* during the pre-application consultation stage of the subject SHD application. Specifically, it outlines how the Applicant has addressed the issues highlighted in the ABP Opinion of 10th August 2018. In addition, items raised in South Dublin County Council's (SDCC) pre-application S.6 (4)(b) report are addressed, along with any other matters discussed during the tripartite pre-application consultation meeting of 30th July 2018.

2.0 RESPONSE TO ISSUES RAISED BY ABP

In its Opinion of 10th August 2018, *ABP* stated that the documentation submitted as part of pre-application consultation required further consideration and amendment in order to constitute a reasonable basis for an SHD application. Specifically, it required that the following issues be addressed:

1. Car Parking Provision Rationale and *Mobility Management Plan*;
2. Evidence of Standard of Amenity for Proposed Apartments and Student Accommodation;
3. Demonstration of Quality of Proposed Development (finishes, materials, detailing, landscaping, surface/boundary treatments);
4. Demonstration of Quality of Proposed Cycle Facilities and Parking;
5. Phasing and timeline of Proposed Development including compatibility with development of adjoining lands surface Water Drainage and Flood Risk;
6. Additional Details of Water Supply and Drainage Infrastructure.

In addition, a number of specific information items were requested as follows:

1. *A Mobility Management Plan*;
2. An Analysis of the Impact of the Development in terms of Daylight / Sunlight and Microclimate;
3. *Estate Management and Building Life Cycle Report*;
4. Report Demonstrating Compliance with the *Design Manual for Urban Roads and Streets* and the *National Cycle Manual*;
5. Details of compatibility with the BRT Project and BusConnects;
6. Details of measures to ensure aviation safety;
7. Part V proposals.

These are addressed in detail below.

2.1 CAR PARKING PROVISION RATIONALE AND MOBILITY MANAGEMENT PLAN

2.1.1 ABP's Requirement:

“Further Consideration / amendment of all the documents as they relate to the provision of car parking and mobility management with the proposed development. The documentation submitted at application stage should provide a robust rationale for the amount of car parking that is proposed. This should have due regard to the pattern of demand for travel that is likely to arise the occupation of the proposed development, as well as to the likely demand from households to have access to private transport even where it does provide the primary mode for travel to work or school. The documentation should also take proposed account of the prospective future development of the rest of the site, and to the prevailing patterns of car ownership in the area, whereby circa 87% of households in the county and circa 73% of households in the electoral division where the site lies reported having at least one car at the last census”

2.1.2 Applicant's Response

O'Connor Sutton Cronin, Consulting Engineers have prepared a *Response to ABP Opinion* which should be read in conjunction with the submitted *Traffic Impact Assessment* and *Mobility Management Plan* in order to provide a comprehensive rationale for the provision of car parking and mobility management within the scheme.

It is noted that the existing level of car ownership within the County and Electoral Division is reasonably high, however given the rural nature of much of the County which extends significantly into the Dublin Mountains, it is submitted that a higher proportion of car ownership is unavoidable due to reduced availability of public transport options. In addition, much of the housing stock within the Electoral Division (ED) of Tallaght-Springfield comprises suburban semi-detached housing with in-curtilage parking, which pre-dates the high capacity Luas line resulting in a greater challenge in terms of reducing car dependency and shifting towards more sustainable modal transport.

Therefore, it is considered appropriate to examine the Small Areas within the Tallaght-Springfield ED, which are more comparable to the proposed development in that they comprise higher density, apartment development within close walking distance of Tallaght Town Centre and high quality public transport. In this regard, the *Traffic Impact Assessment* (TIA) prepared by OCSC provides a detailed breakdown of 11 no. Small Areas, which surround the subject site and finds that households that do not own a car ranges between 8% - 49%. Notably, the small area which is most comparable to the subject site in terms of size and location has the lowest level of car ownership.

The TIA emphasises that existing car ownership rates are considered to represent a *worst case scenario* as these are without the benefit of the incorporation of specific measures to reduce car ownership and measures to facilitate a positive modal shift to sustainable transport use. It is also important to note that car ownership does not necessarily equate to frequent car use. In this regard, it is noted that the majority of residents commuting in the local area do so by means other than the private car resulting in the majority of cars remaining at home and used only for more infrequent trips.

Therefore, it is proposed to meet this infrequent trip demand by the provision of 3 no. car club scheme cars to be located permanently within the scheme, which will facilitate one off trips which require a car e.g. bulky shopping.

A Management Company will be responsible for the effective and safe management of parking within the site. The proposed 107 no. spaces within the podium will be allocated to those residents who have opted to rent a parking space here. This will also give the opportunity for residents who find they no longer have a need to rent a space to end their lease of a space when they require. A further 22 no. on street spaces will be dispersed at grade through out the scheme and will be used for short term parking and set down / drop-off. The Management Company will be responsible for managing the use of these spaces and a detailed management scheme will clearly communicated to all prior to occupation of the scheme.

In addition, it is important to note that many of the main destinations which future residents are likely to need to access in terms of employment and recreation are located within easy walking distance of the subject site.

These include Tallaght University Hospital, The Square Shopping Centre, Institute Technology Tallaght and South Dublin County Council. There are also a number of additional major employment hubs located in close proximity including the Lidl Headquarters, RUA Red South Dublin Arts Centre, Roadstone Ltd – Belgard, Maldron Hotel Tallaght and a large number of retailers and service providers.

Additional measures to reduce dependency on private car ownership include a significant quantum of cycle parking whereby a total of 1,227 no. spaces will be provided within secure and accessible areas throughout the scheme for the use of residents and visitors. A full breakdown of how these spaces have been allocated is provided within the TIA and *Mobility Management Plan* as prepared by OCSC. In addition, the Applicant is in advanced discussions with a local Bicycle Club operator and 20 no. club bicycles are proposed to be located within the plaza to the south of the Student Accommodation block, which will be easily accessible to residents and visitors.

It is submitted that the subject site represents one of the best suited locations for the provision of a near car-free development. It is envisioned that the proposed development will comprise a landmark development in terms of sustainability and this will be communicated at all points in the marketing process in order to ensure that prospective residents are fully aware that private car ownership will not be facilitated for all residents. This is also in line with the 2018 *Apartment Guidelines*, which permit 'car-free' developments provided this is fully communicated within sales and marketing processes.

2.2 EVIDENCE OF STANDARD OF AMENITY FOR PROPOSED APARTMENTS AND STUDENT ACCOMMODATION

2.2.1 ABP's Requirement:

"Further Consideration of the documents as they relate to the standard of amenity that would be provided to the occupants of the proposed development.

The documentation submitted at application stage should be sufficient to demonstrate that the proposed apartments and student accommodation would be provided with sufficient internal accommodation, privacy, daylight and sunlight, and private and shared open space, and that they would comply with the applicable requirements of the development plan and the apartment design standards issued in 2018, including its Specific Planning Policy Requirements”.

2.2.2 Applicant’s Response

Internal Accommodation

With regard to the proposed residential apartment accommodation, a detailed Housing Quality Assessment (HQA) has been prepared by OMP Architect’s which sets out the residential floor areas required including overall area, storage spaces and private amenity space.

It is noted that Specific Planning Policy Requirement 3¹ (SPPR 3) of the *Apartment Guidelines* provides for the following minimum apartment floor areas:

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

The HQA demonstrates that in all cases, the minimal requirements as set out in SPPR 3 are met, and in many cases exceeded.

It should be noted that 52% of apartment exceed the 10% additional floorspace requirement as required by the Apartment Guidelines.

Privacy

All apartments are orientated to ensure that no overlooking occurs and that sufficient distances are provided between opposing windows. Separation distances of between 30 and 45m are provided throughout the scheme.

Daylight and Sunlight

A *Daylighting and Sunlight Report* has been prepared by JV Tierney Consulting Engineers and should be referred to in terms of the detailed analysis of the quality of internal and external access to light. The report demonstrates that access to daylight is very positive throughout the scheme. In summary, all 4 no. courtyards within the scheme receive adequate levels of sunlight on the 21st March with access to sunlight increasing as the months progress.

In addition, 80% of habitable rooms within the scheme meet average daylight factor targets as set out by *BS 8206-2:2008: Lighting for buildings - Part 2: Code of practice for daylighting*. This exceeds international environmental assessment standards.

¹ Sustainable Urban Housing Design Standards for New Apartment: Guidelines for Planning Authorities, 2018, p. 11

These international standards include BREEAM, which targets a figure of 80% and LEED, which targets a figure of 75% in order to award a credit under the daylighting criteria. Notwithstanding this, it is acknowledged that a proportion of rooms do not meet the ADF target.

In this regard, the *Apartment Guidelines* state 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, which planning authorities should apply their discretion in accepting taking account of its assessment of specific. This may arise due to a design constraints associated with the site or location and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution”².

In line with the above, it is submitted that given the requirement to ensure the sustainable use of this prime, zoned site, it is necessary to provide for higher buildings with the result that buildings on the lower floors have reduced access to natural daylight. It is submitted the desirability to retain a low site coverage (through generous public realm and open spaces) requires that density be provided via higher buildings which reduces the ability to achieve 100% compliance with ADF targets. It is also important to note that the scheme will be fully compliant with the stated international standards which demonstrates that the development has ‘maximised the daylight’ for the occupied spaces and therefore there is sufficient justification for the levels of daylighting achieved.

Private and Shared Open Space

All apartments are provided with a private amenity space in the form of a terrace, balcony or wintergarden which meet or exceed private open space requirements. In addition, a number of apartments are provided with very generous balcony which avail of excellent views towards the Dublin Mountains which will be particularly suitable to larger households.

Communal open space is provided throughout the scheme and will be easily accessible to all residents. As per the requirements of the 2018 *Apartment Guidelines*, a total of 2,850 sqm of communal open space would be required. The proposed development significantly exceeds this as 4,266 sqm of communal open space is provided within Courtyards A1, A2/A3 and B1. In addition, residents internal amenity space is provided at ground floor within Blocks A1, A2 and A3 amounting to c.732 sqm in total and facilitating a range of uses including resident’s lounge, multi-use function room and work spaces.

It is noted that there is no standard in place for the provision of communal open space for student accommodation, however a courtyard of 1,250 sqm is provided which equates to 3 sqm per student. In addition, c.815 sqm of internal communal space is provided for the use of student residents which results in a total of 5.1 sqm per student.

A detailed design rationale for communal open space provision is provided within the accompanying *Landscape Design Rationale* prepared by Brady Shipman Martin Landscape Architects and should be consulted in this respect.

² Sustainable Urban Housing Design Standards for New Apartment: Guidelines for Planning Authorities, 2018, p. 34

A summary overview of all issues relating to the standard of amenity of the scheme is provided by the submitted *Response to ABP Opinion* as prepared by O'Mahony Pike Architects.

2.3 DEMONSTRATION OF QUALITY OF PROPOSED DEVELOPMENT (FINISHES, MATERIALS, DETAILING, LANDSCAPING, SURFACE/BOUNDARY TREATMENTS)

2.3.1 ABP's Requirement:

"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 and that the landscaping and surface / boundary treatments of the streets and outdoors space would be of sufficient quality to ensure that the proposed development made a positive contribution to the character of the area over the long term".

2.3.2 Applicant's Response

External Finishes, Materials and Detailing

A number of design changes in respect of external finishes, materials and detailing were undertaken by O'Mahony Pike Architects following the receipt of the ABP Opinion. These amendments were sent to the County Architect of SDCC for review and approval was received on 11th October 2018. A summary of the issues raised and response is provided below.

a) Massing and treatment to proposed 10 - storey 'gateway' building in Block A3 at the junction of Belgard Square North and proposed new North/ South access avenue.

The previously proposed 12 storey element of Block A3 has been reduced to 10 storeys in height with an amended sculptural form at the upper levels with a light filigree top to reduce the potential for visual bulk. The 7 storey datum height from blocks A1 and A2 form the 'shoulder' to block A3 on the corner which provides a continuous rhythm and continuity along the street. The 10 storey 'gateway' element is setback from the 7 storey element and emerges from this form as a 9 storey brick volume with a light metal clad penthouse level on top. A line of winter gardens are provided along its eastern façade to create a strong visual marker and help accentuate the corner while marking the main access point into the development.

A brick grid pattern has also been extended around the sides of each of blocks A1, A2 and A3, which breaks up the façade and adds visual interest. Secondary windows are introduced within this grid to animate the sides and facilitate passive surveillance along the street.

b) Refined frame support detail to balconies on 4 – storey elements along with revised balcony treatment illustrating a combination of vertical railing and solid side aluminium panel.

The balcony detail and treatments facing onto Belgard Square North have been further refined to provide improved privacy for residents, mitigate noise levels and create an improved public realm.

On the 4 storey elements, all projecting balconies are supported by a steel frame and are provided with a 50% solid face finished in a grey aluminium panel. This also acts as a partial screen for residents' laundry. All private amenity space on the taller 7 storey elements are inset terraces within the form of the building.

c) Additional 2 floors added along Western edge of student accommodation block.

In order to improve consistency in height and scale an additional 2 floors of accommodation have been added to the West wing of the student accommodation block. This improves the sense of enclosure to the central student courtyard at podium level and improves sense of presence onto the public street.

d) Massing, setback and material treatment to the top 7th and 8th floors of Block B2 student accommodation at junction with Belgard Road.

The top 2 levels are provided with a change in material and fenestration treatment in order to give a subtle variation and emphasis to the building top signifying its importance as a 'Landmark' building at the prominent junction between Belgard Square North and Belgard Road. A lighter render finish is provided with a rhythm of recesses infilled with a gold/ bronze metal panel and glass system to create an elegant double height emphasis.

e) Introduction in variety of finishes and treatments.

The overall intention is to provide a strong built form characterised by the use of brick to address the public realm and create an enduring and long lasting aesthetic. There are two types of different brick finishes provided to the apartment blocks, with red brick defining the principle 7 storey facades addressing Belgard Square North, creating a strong rhythm along the street. A lighter tone, in a more buff colour brick is used on the 4 storey setback areas to provide variation. A darker brown brick is proposed to distinguish the student accommodation block and help give it a unique identity on the corner, separate to the residential apartments. A mixture of grey and bronze metal panelling is introduced to provide additional richness in material and variation. A render finish is predominantly used on the inner courtyards to provide a lighter aesthetic and to facilitate brighter communal amenity spaces.

Landscaping and Scheme Management

In line with the landscaping led approach of the scheme, significant green roof provision is facilitated for each block. Higher roofs are provided with extensive sedum roofs (low level grasses) whilst the lower roofs will be provided with intensive green roofs, which will be planted with a range of plants and soft landscaping. These roofs will not be publicly accessible, however they will provide a high quality visual amenity, particularly when viewed from upper residential storeys.

A full overview of the landscaping, boundary treatments and public realm proposals is given within the submitted landscaping drawing pack and Design Rationale Report prepared by *Brady Shipman Martin*.

It is clear that significant consideration has been given to the creation of an exemplary urban quarter, which will be inviting and easily enjoyed by a wide range of persons. In particular, the central public plaza will act as a focal point for the scheme with a range of benches and seating option, multi-use space and high quality planting.

A comprehensive overview of the maintenance and cost considerations of proposed materials is provided within the *Building Lifecycle Report and Estate Management Strategy* prepared by Aramark, which accompanies this planning application.



Fig. 1: CGI A illustrating proposed public plaza (Source: 3DDB)

2.4 DEMONSTRATION OF QUALITY OF PROPOSED CYCLE FACILITIES AND PARKING

2.4.1 ABP's Requirement

"Further consideration / amendment of the documents as they relate to the provision of cycle facilities. The documentation submitted at application stage should demonstrate that the cycle facilities along streets are designed in accordance with the National Cycle Manual and they provide an acceptable quality of service with continuity and suitable priority across junctions; that they avoid conflict between cyclists and pedestrians; and that they allow access to destinations on both sides of the street for cyclists. Segregated facilities should only be provided where the criteria set out at section 1.7 of the manual have been met. The documentation should show cycle parking in secure and convenient locations across the development to meet the needs of occupants and visitors and in various formats that are accessible and easy to use by cyclists with the range of physical capabilities that would be expected in a residential scheme. The documentation should indicate how the amount of cycle parking would comply with the relevant guidance set out in the development plan, section 5.5 of the National Cycle Manual and section 4.15 of the apartment design standards".

2.4.2 Applicant’s Response

A detailed overview of the design and provision of cycle facilities within the scheme is provided by the submitted *Response to ABP Opinion* and *Traffic Impact Assessment* prepared by OCSC Consulting Engineers.

It is submitted that all cycle facilities have been designed in accordance with the *National Cycle Manual* (NCM) and in consultation with the NTA and SDCC and a detailed overview of the cycle lane design throughout the scheme is provided in the accompanying documentation.

Cycle parking is provided in secure, convenient locations through the scheme within bicycle storage areas within building blocks or the internal courtyards.

A detailed overview of the breakdown of cycle space provision is provided within the OCSC Response to Opinion, however the following table provides a summary of the proposal.

Block	A1, A2, A3	B1	B2
Required Spaces	731 ³	257 ⁴	484
Proposed Spaces	548 ⁵	193 ⁶	484
Location Breakdown	548	679	

Table 1: Summary of cycle space provision proposals

Essentially, it is proposed to provide 75% of the cycle spaces required by the *Apartment Guidelines*. It is noted that deviation from the required standards shall be at the discretion of the Planning Authority and subject to adequate justification. Based on the existing modal split within the area, availability of public transport and close walking distance from the site to key destinations, a 75% provision of cycle parking is considered appropriate. Cycle parking for student accommodation is compliant with *Development Plan* standards.

In terms of the nature and range of cycle space options available to residents, it is proposed to provide a number of different options suitable for different users, ages and ability. The spaces allocated for student accommodation residents will be higher density stacked versions (suitable for higher mobility users) whilst the residential blocks will have a greater proportion of traditional Sheffield stand arrangements.

2.5 PHASING AND TIMELINE OF PROPOSED DEVELOPMENT AND TIMELINE OF PROPOSED DEVELOPMENT INCLUDING COMPATIBILITY WITH DEVELOPMENT OF ADJOINING LANDS

2.5.1 ABP’S Requirement

“Further consideration / amendment of the documents as they relate to the phasing of development on the site and its integration with the development and regeneration of the town centre.

³ Based on *Apartment Guidelines*, 1 space per bedroom (569 no. spaces) and 1 visitor space per 2 apartments (162 no. spaces)

⁴ Based on *Apartment Guidelines*, 1 space per bedroom (199 no. spaces) and 1 visitor space per 2 apartments (58 no. spaces)

⁵ Based on a 75% provision of the requirement based on existing quality of public transport options and walkability

⁶ Based on a 75% provision of the requirement based on existing quality of public transport options and walkability

The documentation should indicate how the timeframe in which the proposed development would proceed and that the infrastructure required to support and facilitate development on the rest of the application site and on neighbouring land was provided in a timely manner. The documentation should also demonstrate that the layout and design of the development would be compatible with the proper and sustainable development of adjoining land”.

2.5.2 Applicant’s response

The design team has ensured that the development will be compatible with the proper planning and sustainable development of adjoining land, and the wider area, through establishing a ‘Masterplan’ approach to the development of the site.

This masterplan approach takes full cognisance of the Phase I and Phase II proposals, in addition to the development potential of the adjoining land to the west in the ownership of SDCC. The proposed development has been designed as a result of this masterplan approach and in line with ongoing discussions with SDCC which ensures that there will be no conflict with the future development of their lands.

In terms of the development phasing of the subject site, a detailed *Construction Management and Phasing Management Plan* has been prepared by OCSC Consulting Engineers and provides an analysis of the proposed demolition and building out works for the development which is expected to have a final completion date of Q4 2021. A phasing programme is provided within the *OCSC Response to ABP Opinion* and the *Construction Methodology and Phasing Management Plan*.

The phase I construction process is split into 5 stages commencing with the southern portion of the primary north-south street. The second construction phase will commence the construction of the western residential blocks and the upgrade of Belgard Square North and the Belgard Road pedestrian crossing. The construction of the remainder of the north-south street will then begin, in addition to the public plaza and the final residential Block B1. Phase 4 will see the 4 no. residential blocks and the road upgrades completed with a temporary car park installed for the use of residents. Construction of the student accommodation block will also begin. The final phase of development will see all phase I elements completed and the removal of the temporary car park.

It is important to note that ensure the timely delivery of the north south street is acknowledged to be an important objective for the site and surrounding area and therefore, the Applicant has undertaken to deliver this road within three years of commencement of construction. The entire phase I scheme is likely to be completed in Q4 2021.

Design proposals for phase II are well advanced and it is anticipated that planning approval will be in place during Q2 2019. A revised phasing plan will be put in place for the phase II proposal, however it is likely that there will be some construction synchronicity between both schemes. In total, an overall construction build time of seven years is expected for the full 7.2 hectare site which will deliver c.1,500 residential units, a student accommodation scheme, a childcare facility, community centre, public plaza and commercial units.

It is important to note that no additional infrastructure outside of that proposed as part of the subject planning application is required to facilitate the proposed development.

Cognisance has been had to external local proposals, which may integrate with the proposed scheme including the Cookstown Extension Road as recently approved under the Part 8 process and *BusConnects* programme. OCSC met with the Council’s Cookstown Extension Road design team and agreed interfaces between the Part 8 road through the SDCC site and connecting to the proposed scheme. In addition, OCSC have liaised with the NTA with regard to accommodating the *BusConnects* programme on Belgard Square North. Therefore, the proposed development is fully compatible with these proposals.

It is noted that there is a long term roads objective located to the north of the subject site which is known as the Airton Road Extension. The exact route of this new road has not yet been determined by SDCC and direct discussion between SDCC and land owners along the route are due to commence in the near future. This proposal is unaffected by the Phase I scheme and the design of the Phase II site is progressing based on a layout that would accommodate different scenarios which will allow for the delivery of the road.

The Applicant (via its parent company, Marlet) continues to engage with SDCC regarding the proposed HeatNet project which intends to develop a pilot 4G (fourth generation) district-heating network linked to waste-heat generated from the new data-centre on Belgard Road. SDCC commenced a Part 8 consultation for the construction of an energy centre and associated underground heat network pipes on 19th October 2018, which was approved on 10th December 2018. Marlet has provided a letter of consent to SDCC for the inclusion of pipes which traverse the subject site within the Part 8 consultation and continues to support the project subject to detailed design and agreement. The finalised location of the pipe route (which SDCC have confirmed to be exempted development, will be subject to agreement and the consent of Marlet. This will ensure that there is no conflict with services or structures associated with the proposed scheme should permission be granted for both the subject proposal and the Heatnet project.



Fig. 2: Integration of the development with surrounding area

Please see the accompanying *Masterplan* document prepared by OMP Architects and the Engineering Services Report prepared by OCSC Consulting Engineers, which provides further detail regarding the masterplan and consultative processes.

2.6 ADDITIONAL DETAILS OF WATER SUPPLY AND DRAINAGE

2.6.1 ABP'S Requirement

"Further Consideration of the documents as they relate to water supply and drainage infrastructure. The documentation submitted at application stage should be sufficient to demonstrate that the proposed surface water infrastructure would be adequate to cater for the proposed development and whether the council has indicated its agreement or otherwise to the proposals in this regard".

2.6.2 Applicant's response

A comprehensive response to this issue has been prepared by OCSC and included in their *Response to ABP Opinion*. The *Response* provides an overview of their undertaken consultations with Irish Water and SDCC in order to ensure the most appropriate water supply and drainage infrastructure for the scheme.

OCSC met with SDCC Water Services a number of times (most recently on 14th August 2018), as detailed in the accompanying *OCSC Response to ABP Opinion*, to discuss and agree the water supply and drainage infrastructure proposals for the application. Further subsequent discussions, in the form of email and telephone correspondence, took place in order to clarify the proposed surface water drainage design strategy and is provided within Appendix A of the *OCSC Response to ABP Opinion*.

The submitted documentation relating to surface water drainage shows that 3 no. separate drainage catchments are proposed as follows:

- Main attenuation catchment (4.93 hectares)
- Taken in Charge Road (0.57 hectares)
- North East Corner of Site (1.14 hectares)

The design approach used in determining the attenuation volume is part of an overall integrated drainage network, comprising intensive green roofs, extensive green roofs, bio-retention strips with filter drains under, as well as conventional pipe and underground storage system. This is detailed extensively in Section 3.4 of the Engineering Services Report. As part of discussions with SDCC, an executive summary of this approach was relayed via a series of emails and telephones calls concluding on 25th October 2018 (see Appendix A of *OCSC Response to ABP Opinion*).

It should be noted that the concern of SDCC relating to the potential undersizing of the proposed attenuation system was resolved via further correspondence from OCSC which further explained the design methodology of applying a runoff coefficient of 0.84 (winter) and 0.75 (summer) for hardstanding and landscaped areas, while using a Time Area Diagram input for the green roof areas, as opposed to reduced runoff coefficient.

A catchment overview table was also provided which demonstrated to SDCC that the attenuation system and drainage proposal was acceptable and no further clarification was requested from SDCC.

Irish Water have provided a confirmation of feasibility and a Statement of Design Acceptance for the proposed development with details provided within the OCSC documentation. In addition, a copy of the email correspondence between OCSC and the Drainage Division of SDCC is set out in Appendix A of the OCSC *Engineering Services Report*. Correspondence with Irish Water is provided in Appendix E of the *Engineering Services Report*.

3.0 RESPONSE TO ISSUES RAISED BY SDCC

In addition to the issues raised by ABP in their Opinion dated 10th August 2018, we note that South Dublin County Council's S.6(4)(b) submission documents to the Board contain various items of detail. We address these issues below where they are not already covered by the above numbered items from An Bord Pleanála's Opinion.

3.1 Expiration of Tallaght LAP and Proposed heights

In their Report, SDCC acknowledge that the Tallaght LAP 2006 – 2016 has recently expired but state that *"it is considered an appropriate aid and carries a degree of significance as it is the most recent LAP for the area and has only – relatively recently – expired"*⁷. Notwithstanding this, there is a clear recognition of the way in which National Policy has evolved in the time since the adoption of the LAP and that the proposed density and height proposals are reflective of this.

The SDCC Report agrees that the proposed development comprises a mix of residentially led uses which would support an intensive and integrated working and residential population.

The Report considers that although 50% of the proposed blocks are above the identified height restrictions within the expired LAP, this is reflective of National Policy.

The Planning Authority note that the location of the proposed 10 storey block is reflective of the identified Landmark location within the LAP. The Planning Authority submitted that the visual appearance of the 10 storey block could be improved through recessing elements of the top two storeys to improve its relationship between the block and the street.

In addition, the Planning Authority noted that the location of the 9 storey block at the south eastern corner of the site is in line with the Gateway location indicated within the LAP and considered this broadly acceptable and consistent with National Policy. As with the recommendation with regard to the 12 storey block (subsequently revised to 10 storeys), it was considered that a visual improvement could be made through recessing elements of the upper storeys.

Finally, the Planning Authority submitted that any planning application should be accompanied by supplemented and improved photomontages.

⁷ SDCC S.6(4)(b) submission document to An Bord Pleanála, 17th July 2018

3.1.1 Applicant's Response

The Application has considered the views of SDCC with regard to the visual appearance and proposed height of the development and has undertaken a number of design changes in the preparation of this planning application.

With regard to Block A3 which was previously proposed to be 12 storeys in height, this has now been revised to 10 storeys. In addition, a number of design and massing amendments have been undertaken in order to sculpt the massing of the upper storeys and to provide a light filigree set back 10th storey. The streetscape for Blocks A1, A2 and A3 now reads as four storeys stepping to 7 storeys with Block A3 acting as the landmark block being 10 storeys in height and marking the entrance to the scheme.

Block B2, which forms the landmark corner, remains 9 storeys in height, however additional façade articulation has been provided through a change in materials at the upper two floors of both Block B1 and B2. The upper two storeys are to be finished in a light coloured render which reduces any potential visual bulk.

A comprehensive set of photomontages including CGIs have been prepared by 3D Design Bureau and accompany this planning application. An LVIA in respect of the proposal has been prepared by Mitchell and Associates and is included as part of the EIAR.

4.0 OTHER ISSUES

In addition to the items outlined above, we note that ABP's Opinion required that the following be submitted with an application

1. *A Mobility Management Plan*

A Mobility Management Plan has been prepared by OCSC Consulting Engineers and accompanies this planning application.

2. *An Analysis of the impact of the Development in terms of Daylight / Sunlight and Microclimate*

A Daylighting and Suncast Report has been prepared by JV Tierney Consulting Engineers and accompanies this planning application. In addition, a MicroClimate Assessment Report prepared B-Fluid has also been submitted.

3. *Estate Management and Building Life Cycle Report*

An Estate Management and Building Life Cycle Report has been prepared by Aramark and accompanies this planning application.

4. *Report Demonstrating Compliance with the Design Manual for Urban Roads and Streets and the National Cycle Manual*

An Engineering Services Report and Traffic Impact Assessment have been prepared by OCSC Consulting Engineers and demonstrate compliance with *DMURS* and the *National Cycle Manual*.

5. Details of compatibility with the BRT Project and BusConnects

An *Engineering Services Report* and *Traffic Impact Assessment* have been prepared by OCSC Consulting Engineers and demonstrate compliance with DMURS and the *National Cycle Manual*.

6. Details of measures to ensure aviation safety

Please see enclosed *Glint and Glare Assessment* undertaken by MacroWorks. In addition, an overview of the correspondence between Marlet and The IAA, TUH and the Air Corps has been provided (see Appendix C of the *Planning Application Form*).

7. Part V proposals

A copy of the Part V proposals including a schedule of accommodation and indicative costings with a letter from SDCC stating acceptability in principle of the proposal is enclosed.

5.0 CONCLUSION

We consider that all issues that have been raised during pre-application consultation have been successfully addressed in the proposal now before the Board.

The subject proposal represents the opportunity to deliver a significant quantum of much needed housing in Tallaght as well as a substantial public amenities and facilities including new streets and public realm works in addition to a new public plaza.