

# PLANNING REPORT

Strategic Housing Development at  
Former Gallaher's site, Airton

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**On behalf of:**

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**RE: SHD Development on site of former Gallaher’s cigarette factory at the junction of Airton Road and Greenhills Road, Tallaght, Dublin 24, comprising:**

- Demolition of existing factory/warehouse buildings on site (total floor area c.10,076.8 sqm).
- Construction of 502 no. apartments (comprising 197 no. 1-bed; 257 no. 2-bed; and 48 no. 3-bed units) within 6 no. blocks ranging in height from 4 to 8 storeys. All residential units provided with associated private balconies/terraces to the north/south/east/west elevations.
- Provision of residential amenity facilities, 3 no. retail units, creche, and services/bin store areas (total non-residential floor area c.1,838 sq.m).
- A total of 202 no. car parking spaces (at basement and undercroft levels) and 584 no. bicycle parking spaces.
- Vehicular/pedestrian/cyclist accesses from Greenhills Road and Airton Road. Provision of road improvements and pedestrian crossings.
- All associated site development works, open spaces, landscaping, boundary treatments, plant areas, pv panels (at roof level), waste management areas, and services provision (including ESB substations).

## INTRODUCTION

On behalf of the applicant Greenleaf Homes Limited this planning report accompanies a planning application to An Bord Pleanála under Section 4 of the Planning and Development (Housing) and Residential Tenancies Act (2016) for a proposed Strategic Housing Development at the former Gallaher's site, at the junction of Airton Road and Greenhills Road, Tallaght, Dublin 24, in accordance with the Planning and Development (Housing) and Residential Tenancies Act 2016.

The application has been prepared by a multidisciplinary team on behalf of Greenleaf Homes Limited as set out in the table below:

<b>Company Name</b>	<b>Documents Prepared</b>
MCG Planning	Planning Report Statement of consistency Response to ABP Opinion Material Contravention Statement Environmental Impact Assessment Report
Ferreira Architecture	Housing Quality Assessment Design Statement Architectural Drawings Masterplan Document
Mitchell and Associate Landscape Architects	Landscape Design Statement Landscape Drawings
Tree Management Services	Arboricultural Assessment Tree Constraints Plan Tree Survey Drawing
GeoData Surveying Ltd	Existing building surveys
Whitehall Environmental	Appropriate Assessment Ecological Impact Assessment
3D Design Bureau	Photomontages and CGI’s
Barrett Mahony Consulting Engineers	Traffic Assessment DMURS Statement of Consistency Drainage Layout Drawings Flood Risk Assessment

	Lifecycle Report Construction and Demolition Waste Management Plan
IAC Archaeology	Archaeology Report
Traynor Environmental	Operational Waste Management Plan
IN2 Engineering Design Partnership	Microclimate Assessment
	Daylight/ Sunlight analysis
GeoData Surveying Ltd	Contour / site level map
Future Analytics	Report
Wildlife Surveys Ireland	Bat survey report
IGSL Ltd	Geotechnical Site Investigation
ILTP	Stage 1 Road Safety Audit
Phoenix Environmental Safety Limited	Asbestos Survey

The proposed application will provide a significant residential development together with supporting retail units, a creche and highly attractive and functional public open spaces. The site is ideally suited for this form of redevelopment due to its underutilised brownfield status, its zoning as “REGEN” and its proximity to high quality bus services, Luas, Tallaght Town Centre, Tallaght Village, Tallaght Institute of Technology, Tallaght Hospital and various other social infrastructure and amenities in the locality. Furthermore, the development is located in close proximity to a number of employment areas.

Prior to the commencement of any design of the proposed scheme, the client commissioned a Development Assessment from Future Analytics Consultants to inform the type of residential development to be pursued.

The design brief to the Architect and other design team members was in turn informed by the findings of this report. Some of the key finds of the report are as follows:

- Household sizes are falling such that by 2026 over 55% of the households in the study area will be 2 person or less. Furthermore 90% of all households in the study area by 2026 will be 4 person or less. Therefore, a bias towards one and two bed units is considered sustainable and justified.
- It was found that only 19% of the students enrolled in the adjacent Tallaght Campus originate from outside of the Dublin region. Therefore, it was felt that purpose built Student Accommodation would not be sustainable or justified and accordingly was omitted.
- Car Ownership Rates in the study area were determined to be low in comparison to other parts of the wider Dublin Region. It was established that 60% of residents have one car or less. The proximity to Public Transport and the falling car ownership rates evident in the study informed the car parking proposals for the submitted development.

## SUMMARY OF THE PROPOSED DEVELOPMENT

Airton Road Properties Ltd. (who have given consent to the applicant to lodge this application) own the subject site and the adjoining property to the west/south-west. Whilst the current site is vacant (since 2003) and available for development the other site is being leased by An Garda Siochana and used as a car compound. There are a number of years left on this contract until that site also becomes available for development.

Notwithstanding this, the applicant (with the consent and instruction of the landowner) has prepared a Masterplan for the redevelopment of the overall landholding (measuring c.3.8ha) into a significant, new residential quarter served by a network of accesses, streets, open spaces, and ancillary services.

The masterplan envisages a development of up to 11 no. residential blocks with key urban edges onto Greenhills Road to the west, Airton Road to the north and the river Tymon/Poddle to the south all interconnected by a series of open spaces and car free street running north-south and east-west through the development.

The Masterplan elaborates how the overall lands can be phased with the application site (2.79ha), coming forward in the immediate term as a cohesive and integrated residential development pending redevelopment of the remainder of the lands in the medium-long term.

The current proposal before the Board is for the demolition of the existing 4 no. industrial buildings on the site measuring c. 10,076.8 sq.m and the construction of 6 no. blocks comprising 502 residential units with ancillary communal residential amenity facilities, retail floor space and a creche. Parking will be facilitated in basement of blocks E,F and at under croft level of blocks A,B,C. The statistics for the proposed development are set out below

<b>Development Proposal</b>	<b>Statistics</b>
No. of apartments	502 residential units comprising <ul style="list-style-type: none"> <li>- 197 no. 1-Bed (39%).</li> <li>- 257 no. 2-Bed (51%); and</li> <li>- 48 no. 3-Bed (10%)</li> </ul>
Residential communal facilities	704 sqm comprising <ul style="list-style-type: none"> <li>- 465sqm in block C</li> <li>- 93sqm in block D</li> <li>- 146sqm in block E-F</li> </ul>
Commercial facilities	811 sqm comprising <ul style="list-style-type: none"> <li>- 329 sqm Creche (44 spaces) in block C</li> <li>- 187sqm retail unit in block C</li> <li>- 161sqm retail unit in block D</li> <li>- 134sqm retail unit in block D</li> </ul>
Site Area	Gross site area: c. 2.79 ha  Gross site density: 180 units per hectare  Net site area: 2.48  Net site density: 202 units per hectare
Plot Ratio	1.8
Site Coverage	40%
Building Height	4 to 8 storeys
Aspect	43.8% dual aspect

Communal Open Space	4372 sqm
Public Open Space	6747 sqm
Carparking	202 no. parking spaces
Cycle parking	584 no. cycle parking spaces within covered and secure parking

The proposed development also includes all other associated site development works including bin storage, boundary treatments, green roofs, hard and soft landscaping, plant, lighting, ESB Sub stations, switch rooms and generators and all other associated site works above and below ground.

### SITE LOCATION AND CONTEXT

The former Gallaher’s cigarette factory site is a strategically located brownfield, corner site at the junction of Airton Road and Greenhills Road.

The site is located c. 9km south west of Dublin City Centre, c. 750m north of Tallaght Village, and c. 1.4km north east of The Square Tallaght Shopping Centre. The site is located directly adjoining a high quality bus route (Dublin Bus No. 27) which runs every 10 mins until 7pm Monday to Saturday and every 15 mins on Sundays. The site is also c.1.5km from the Luas Red line to the north-west.

This high profile site fronts onto Airton Road to the north and Greenhills Road to the east. To the south of the site is the Tallaght Institute of Technology Campus. The property to the immediate west/south-west is also in the ownership of the landowner of the current site. However, that property is not vacant but is being leased as a car compound by An Garda Siochana.

**Figure 1- Site Location Map**



(Source: Google, 2019)



**Figure 2 View from Airton Road and Greenhills Road junction**



**Figure 3 View from Airton Road**

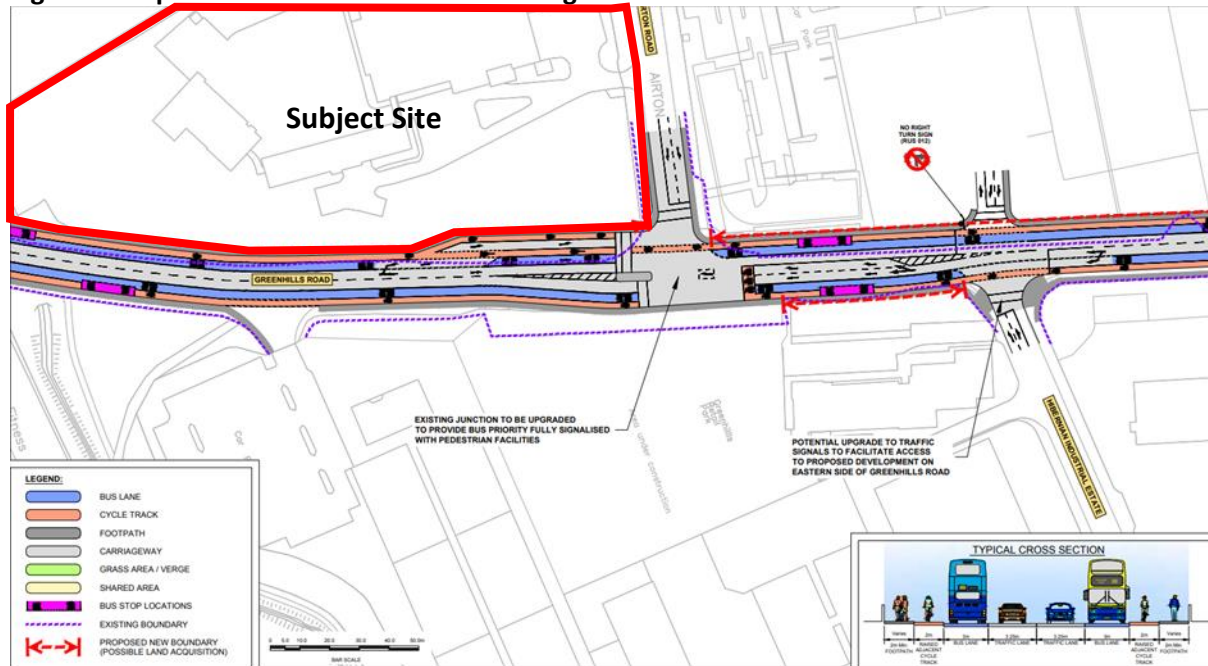


**Figure 4 View from Greenhills Road**



*(Source: Google, 2019)*

**Figure 5 Proposed Bus Connects corridor along Greenhills Road**



(Source: Bus Connects, 2019)

To the west is an Adult disability training centre (Cheeverstown Centre). To the north of Airton Road is the Kilnamanagh Tymon Primary Health Care Centre and a wide other retail/commercial/employment uses (e.g. Harvey Norman, Ford & Kia car sales, etc) within Broomhill Industrial Estate. To the north-east is Greenhills Retail Park with a range of retail services including convenience retail, take-away, and other retail services and commercial/employment uses. To the east and south-east are a range of recreational uses including Bancroft Park, Tallaght Athletics Club, Westpark Fitness club, and Astro Park.

As part of the Bus Connects scheme there is a proposed priority bus corridor for Greenhills Road. When this bus corridor is constructed it will significantly reduce journey times to the City Centre. This proposal will also provide excellent cycle infrastructure for the area. Currently the site is a c. 28 minute cycle to St Stephen’s Green. The proposed site layout is stepped back from the eastern boundary along Greenhills Road to fully accommodate the Bus Connects plan.

Vehicular access to the site is from an existing access point off Airton Road to the north of the subject site and a new access off Greenhills Road to the east of the site. There are also a number of pedestrian entrances to the north and east of the site along Airton Road and Greenhills Road. These pedestrian accesses also provide access for emergency vehicles.

The site has existing factory buildings on it which will be demolished as part of this application. It is not located within a Conservation Area or an Architectural Conservation Area. The topography of the site is generally flat. There are no protected structures on site or within the immediate vicinity of the site.



## PLANNING HISTORY

The site was subject to one previous planning applications in 2007. The application details are as follows:

**SDCC Reg Ref: SD07A/0990**

**Location: Former Gallaher's site at junction of Airton Road and Greenhills Road, Tallaght, Dublin 24.**

**Decision: Granted, 11/11/08**

Permission was sought for the demolition of existing buildings on site and the construction of:

- Block A consisting of three single storey retail warehouse units and an external garden centre (Unit 1 - 3354sq.m., Unit 2 - 1543sq.m., Unit 3 - 1525sq.m. and garden centre - 952sq.m).
- Block B consisting of two single storey car showrooms, security office and bin store (Showroom 1- 1316sq.m., Showroom 2- 934sq.m., security office - 26sq.m., bin store - 40sq.m).
- Construction of car parking providing 229 public parking spaces (including 11 disabled spaces).
- Construction of external car showroom display parking areas - 877sq.m.
- The moving/de-canting of an existing vehicular entrance on Airton Road and the construction of an additional vehicular entrance on Greenhills Road.
- This application was accompanied by an Environmental Impact Statement.

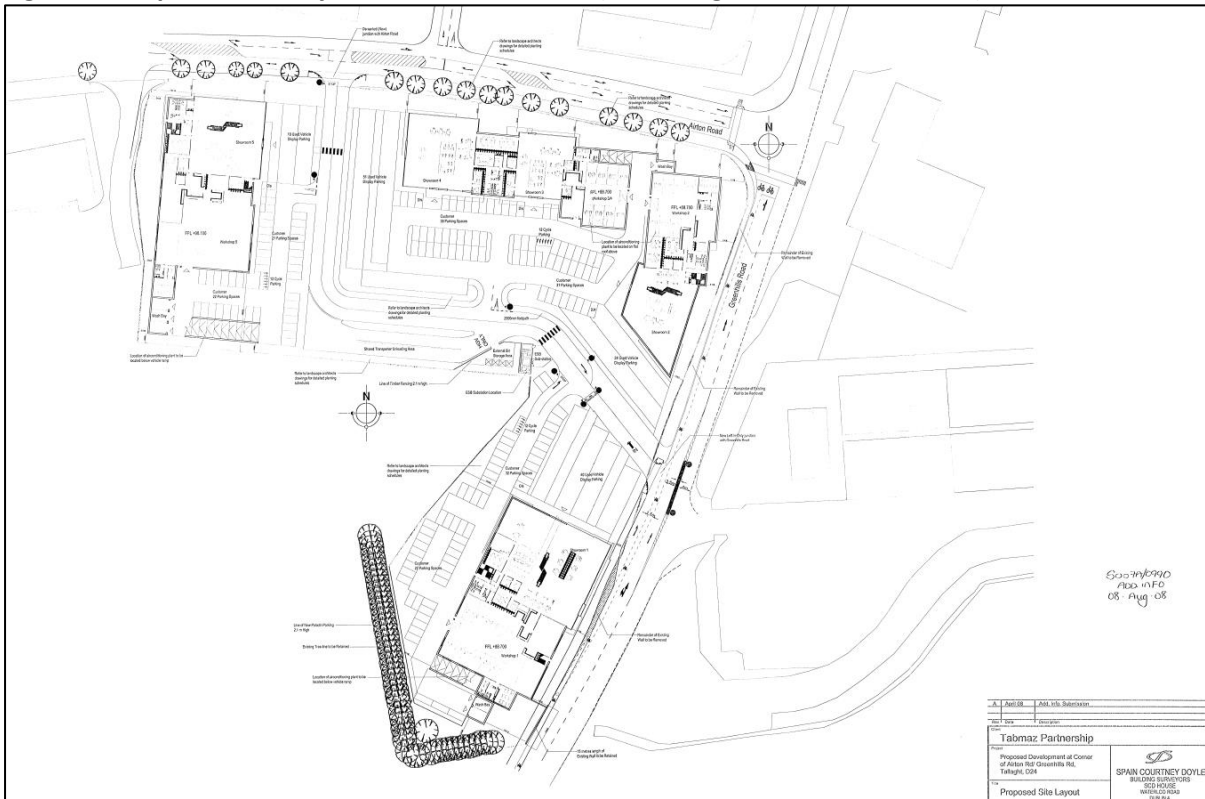
Significant Additional Information was requested by SDCC in February 2008. This saw significant changes to the proposed development consisting of the following:

- The re-design and re-location of car Showroom 1 consisting of an increase in internal floor area from 1316sq.m. to 4547sq.m. and change from a single storey building to a two storey building including ground floor workshop area and car display and first floor compound area and car display.
- The re-design and relocation of Car Showroom 2 consisting of an increase in internal floor area from 934sq.m. to 3402sq.m. and change from a single storey building to a two to three storey buildings including ground floor workshop area and car display, first floor compound area and car display and second floor compound area;
- The change of use and re-location of Retail Warehouses 2 and 3 to Car Showrooms 3 and 4 with an increase in internal floor area from 3068sq.m.(combined) to 3597sq.m. (combined) and change from a single storey building to a two storey building including ground floor workshop area and car display and first floor compound area and car display;
- The change of use and re-location of Retail Warehouse 1 and Garden Centre to Car Showroom 5 with an increase in internal floor area from 4306sq.m. (combined retail warehouse and garden centre) to 4633sq.m. and change from a single storey building to a two storey building including ground floor workshop area and car display and first floor compound area and car display;
- The re-location of the northern access junction on approx. 16metres west along Airton Road.
- The re-location of the in-only eastern access road approx. 30metres to the south along Greenhills Road including the removal of the stone wall along Greenhills Road.
- The omission of the security office. The proposed gross internal floor area has increased from 9722sq.m. to 16211sq.m. (incl. sub-station). Public car parking provisions have reduced from 229 spaces to 168 spaces with an additional 123 external display parking spaces proposed.

Permission was granted by the Local Authority subject to conditions. This development never commenced.

It is considered that this is of little relevant to the assessment of the proposed development.

**Figure 6- Proposed Site Layout Plan SD07A/0990 (Following Further Information)**



(Source: [sdublincoco.ie](http://sdublincoco.ie), SDCC Ref. SD07A/0990)

### Planning history of neighbouring developments

We note that there are a small number of applications within the surrounding area of Airton Road. There are three of particular pertinence which we would like to highlight due to their nature and location

#### ABP SHD

**Reg Ref: ABP -305763**

**Location: Airton Plaza, Lands at the corner of Airton Road and Belgard Road, Tallaght, Dublin 24**

**Decision: Due to be determined on 24<sup>th</sup> February 2020**

Permission is sought for the construction of 328 no. apartments along with ancillary support facilities and commercial floorspace including offices and retail, a café and a creche. The buildings range in height from 5 to 9 storeys.

Figure 7- Photomontages of proposed Airton Plaza SHD



The Airton Plaza SHD which is currently before the Board is at the opposite end of Airton Road to the site the subject of this application, c. 650m away from the application site. It also proposes a mixed-use development and has a height of up to 33.13m above ground level (9 storeys) with a density of 276 units per hectare and with a car parking ratio of 0.56 spaces per residential unit. The Airton Plaza SHD provides for the western access to the potential new green linear route which will connect to the proposed green linear route located to the south of the site the subject of this current application.

The provision of this route at opposite ends of Airton Road enables the comprehensive development of this route as sites come forward for development in line with the Regen zoning for this area.

The re-development of these two sites, at opposite ends of Airton Road, will provide for an attractive street scene, setting the standard for future development along this road. It is also seen as a catalyst for development in this area.

**ABP SHD**

**Reg Ref: ABP -303306-18**

**Location: Belgard House, Belgard Square and the former Uniphar factory, the junction of Belgard Road and Belgard Square North, Tallaght, Dublin 24**

**Decision: Granted, 15/04/19**

Permission was granted for the construction of 438 no. apartments and 403 no. student bedspaces and amenity and staff facilities, creche, 6 retail/ commercial units, parking, public plaza and associated works. The building height ranged from 4 to 9 storeys.

**Figure 8- Photomontages of Permitted Belgard Square developments**

*Top: Proposed elevation along Belgard Road*

*Bottom: Proposed elevation along Belgard Square*



This site is within 900m of the application site with many similarities to the proposed site. Both sites are large sites which will be delivered in two phases with the first phase being granted permission in April 2019 and the second phase, as indicated in the masterplan, to come forward under a second separate planning application. Both sites front onto two roads and are of sufficient size to create their own urban quarter within this area. Given the similarities between the two sites it is important to review and be informed by the Inspectors Opinion when determining this SHD which have similarities



with regard to building heights, car parking and densities. Within the Inspectors Opinion there are logical and clear advice on developments for residential units on Regen zoned lands.

This is a mixed use development on zoned regeneration lands which was granted permission for 1, 2 and 3 bed apartments and student accommodations. The proposed density is 146 units per hectare

In the inspectors opinion, when assessing the application, they highlighted that *“it is unfortunate that an LAP is not in place, it is not reasonable to hold up development in the Tallaght Town Centre area for 3 – 4 years 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 an LAP.”* The inspector also highlighted in their assessment that as the site addresses two public roads with suitable separation distances, that *“the site is wholly capable of establishing its own height”* and that *“the higher elements of the proposed scheme are located at pivotal corners and junctions which create a presence for the development and way finding of the wider area.”* Furthermore, they considered it to be *“effectively a new urban quarter in the area given the size of the site.”*

When examining the proposed mix of the development the Inspector acknowledged that the mix within the wider Tallaght area *“includes large areas of traditional suburban housing comprising 3 and 4 bed units which are often referred to as family homes.”*

Finally, when assessing the application with regard to the proposed car parking levels for the development the Inspectors opinion stated that *“car ownership does not necessarily equate to frequent car use and 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. I would suggest to the Board that the subject site comprises an appropriate location where such car parking provision would be appropriate with the provision in the proposed scheme substantially reduced comprising 0.24 spaces per unit. I consider that if a substantially reduced provision of parking is not appropriate on a site like this then it is unclear where it would be appropriate.”*

**SDCC Reg Ref: SD18A/0219**

**Location: Amazon Data Services Ltd, corner of Belgard Road and Airton Road, Tallaght, Dublin 24**

**Decision: Granted, 20/09/18**

Permission was granted for the construction of a new two storey c. 23,283sqm building for use as data storage facilities containing: data storage rooms, electrical and mechanical plant rooms and support areas, 27 car parking spaces and landscaping.

**Figure 9- Photomontage showing permitted Data centre development along Airton road**



This is located on Airton Road, and the large building will alter the character of this end of the road. While the proposal is for a data centre expansion, it provides for a large building on a corner site.

As can be seen from this brief review of the neighbouring sites planning history, this area of Tallaght is currently undergoing significant change into a more urban area. With this in mind this proposed development is considered to be in keeping with the modern, developments that area permitted and proposed within this area.

### PROPOSED DEVELOPMENT

The proposal is for a mixed-use development on a site of c. 2.79ha. The proposal consists of:

- Demolition of existing factory/warehouse buildings on site
- Construction of 502 no. apartments (comprising 197 no. 1-bed; 257 no. 2-bed; and 48 no. 3-bed units) within 6 no. blocks ranging in height from 4 to 8 storeys. All residential units provided with associated private balconies/terraces to the north/south/east/west elevations.
- Provision of residential amenity facilities, 3 no. retail units, creche, and services/bin store areas
- A total of 202 no. car parking spaces (at basement and undercroft levels) and 584 no. bicycle parking spaces.
- Vehicular/pedestrian/cyclist accesses from Greenhills Road and Airton Road. Provision of road improvements and pedestrian crossings.
- All associated site development works, open spaces, landscaping, boundary treatments, plant areas, pv panels (at roof level), waste management areas, and services provision (including ESB substations).

**Figure 10- Site plan of proposed scheme( Source: Landscape Masterplan, Mitchell Associates)**



### RATIONALE FOR DEVELOPMENT

This site is zoned Objective REGEN “to facilitate enterprise and/or residential led regeneration” in the South Dublin County Development Plan 2016-2022. Residential, childcare facilities, and local shops are all permissible uses under this zoning.

The proposal presents an opportunity to develop the site for modern residential and ancillary commercial use at a well located and serviced site adjoining high quality public transport and a wide range of social infrastructure, amenities and employment opportunities to serve future residents.

The redevelopment of this site accords with the National Planning Framework which aims to develop underutilised sites and deliver significant residential development on sustainable, accessible urban sites, which are beside existing social and physical infrastructure.

This site is considered to be a “Central and/or Accessible Urban Location” for large scale, high density apartment development as set out in the Apartment Guidelines 2018. The No. 27 Dublin Bus service operates along the Greenhills Road directly past the site with buses every 10 minutes until at least 7pm Monday to Saturday and every 15 minutes on a Sunday. The Tallaght IT campus abuts the site to the south. The site is also within walking distance of the Luas Red Line (Belgard stop), Tallaght Village Centre, Tallaght Hospital, and the Square Tallaght is within 1.4km of the site while Tallaght Village is within 500m of the site.

This site has access to a wide range of significant employment opportunities within easy walking and cycling distance or bus connections of the site. The range of easily accessible businesses located proximate to the site, or that are easily accessed by sustainable modes of transport include TU Dublin, Tallaght Hospital, Lidl Ireland Headquarters, Revenue Regional Offices, Amazon Data Centre (which was recently granted permission), City West Business Park, Park West Business Campus, Clondalkin Industrial Estate and Cherry Orchard Industrial Estate.

The site is also directly accessible to a wide range of social infrastructure including a variety of food outlets, schools, playschools, health services, leisure facilities and shops all provided within 15 minutes walking distance of the site in either Tallaght Village or the Square Tallaght. Bancroft Park is located immediately to the east with Tymon Park further east. There are also a range of sports clubs including Tallaght Athletics Club, Westpark Fitness and Astro Park Tallaght, Glenanne Sports Club, and St Marks GAA Club.

The proposed mixed use development will comprise the construction of 502 residential apartments. This includes 197 no. 1-Bed; 257 no. 2-Bed; and 48 no. 3-Bed Apartments across 6 no. blocks and ranging in height up to 8 storeys. The proposal also includes 3 no. retail units (c. 482sq.m total), communal facilities (c. 704sq.m), and a creche (c. 329sq.m).

The net site area for the development is 2.48 Ha which will result in a net density of c. 202 uph. This high density development is comparable to other recently granted SHD permissions in the Tallaght area.

The proposal is fully compliant with the Apartment Guidelines in terms of unit design, communal facilities, refuse storage, communal amenity space, bicycle parking and storage provided within the scheme. A Housing Quality Assessment has been prepared by Ferreira Architects and demonstrates that the provision of a mixed use scheme, with a variety of unit types is appropriate for this site.

## LAYOUT AND DESIGN

The scheme is proposed in 6 no. blocks.

### **Blocks A, B & C**

Blocks A, B, and C are located on the north west corner of the applications site. These blocks are linked by the undercroft parking with podium communal open space. Buildings A and B range in height from 4 to 7 storey rising to 8 storeys in Block C. The combined block contains 130 no. 1-Beds, 132 no. 2-Beds and 13 no. 3-Beds apartments. Block C has a creche (c. 329sq.m) and a retail unit (c. 187sq.m).

The increased height on the corner of Block C adds to the legibility of the scheme denoting the entrance from the north, off Airton Road, into the site. This block also contains generous communal facilities (c. 464sq.m). These facilities will incorporate Management Offices, Residents Gym, Meeting Area, Workstations, Residents Lounges and other resident facilities required to ensure the highest quality living experience and support. This block has a shared communal courtyard at podium level and undercroft parking at ground floor level. Along the north elevation the building heights range from 6 to 8 storey however, in order to maximise sunlight to both the apartments and the communal open spaces the height of this block steps down to 4 storeys to the south of the block. The ranging heights of this block also breaks up the scale and massing.

### **Blocks D, E & F**

Block D is a standalone building which is located in the north eastern corner of the site measuring 6-8 storeys in height. This block contains 36 no. 1-Beds, 56 no. 2-Beds and 15 no. 3-Beds apartments. This block also contains 2 no. retail units (Unit 1 c. 161sq.m and Unit 2 c. 134sq.m). This block has public



open space located to the south west of the block ensuring that the apartments and the public open space have access to sunlight and daylight. This public open space is a key focal point within the development with both the creche and the retail facilities opening onto it. This will be a key link through the centre of the development and a destination point for visitors to the site, including those walking along the Tymon/Poddle River. There is also a public plaza to the north of the building, on the corner of Airton Road and Greenhills Road providing an attractive square on this important corner junction. The retail units provide activity in this area.

Blocks E and F form one large block which is located towards the south of the site measuring 5-7 storeys in height. This block contains 31 no. 1-Beds, 69 no. 2-Beds and 20 no. 3-Beds apartments. This block has a shared communal courtyard and an underground basement parking. This area is overlooked by the public route through the site from the south.

The overall development will be up to 8 storeys in height towards the north and north east of the site along Airton Road and Greenhills Road creating a strong frontage along this important intersection at the north eastern corner of the site. Both of these roads are wide and can facilitate increased the proposed heights it will result in a sense of enclosure of two otherwise very wide roads. The varying heights and the proposed massing of the buildings are considered appropriate to this brownfield site and the REGEN zoning for the site. Within the context of the surrounding area, it is reflective of the taller HSE building on the opposite corner of Airton Road/ Greenhills Road and is considered an appropriate urban design response to this context and its position on a key junction in Tallaght.

It is also noted in the NPF that increased heights are encouraged with the aim of ensuring the growth and development of cities and towns is upwards rather than outwards. This in conjunction with the Urban Development and Building Heights Guidelines 2018 identifies that the increase in building heights is needed in order to ensure compact growth in urban areas enhancing the scale and density of development to ensure sustainable development.

There are 2 no. large areas of public open space. One area is located between Blocks C and D and the other is located south of Block F including the riparian strip of 10m for Tymon/Poddle river, linking into this attractive potential future riverside walk. A total of 6747sq.m of public open space is provided within the scheme. This equates to 27% of the gross site area which is considered generous and appropriate for a development of this kind. There are also significant communal courtyards at ground and podium level within Blocks A, B, C, E and F. All of the open spaces are overlooked by the residential units offering great passive surveillance.

The mixed-use development is located on land zoned for regeneration development. The creche, gym and retail units are all permissible uses under this zoning. The net density of the development equates to c. 202uph which is in line with the Development Plan policy, which sets no upper limits. Heights range from 4 to 8 storeys throughout the site.

There are no residential developments on any of the adjoining land and the immediate area is largely characterised by industrial estate buildings and for that reason overlooking, loss of privacy or residential amenity will not be an issue.

Within the development the appropriate separation distances have been achieved to ensure that there is no overlooking between neighbouring properties. The distance between the properties also ensures that all of the units get appropriate levels of daylight and sunlight internally. Please refer the Daylight and Sunlight Analysis by IN2 Design Partnership which underlines the high quality of sunlight and daylight in the proposed scheme.

An appropriate mix of unit types has been chosen to provide housing options for a wide variety of people. This comprises of c. 39% no. 1 bed, 51% no. 2 bed, and 10% no. 3 bed dwellings. This mix has been informed by the analysis carried out by Future Analytics into the type of development appropriate for this site. This is also supported by the Inspectors Opinion on the Belgrave Square SHD. The proposed mix will provide greater choice of residential stock within the wider area, which is currently dominated by 2 storey detached, semi-detached and terraced houses. It is submitted that the proposed mix caters more towards the emerging and established household size trends that are explained in the Future Analytics Report.

### Open space

As can be seen from the drawings prepared by Ferreira Architects and Mitchell + Associates Landscape Architecture, a large quantity of high quality landscaped open space has been incorporated into the scheme. There is c. 6747sq.m of public open space and c. 4372sq.m of communal space, or 27% net site area is provided as public open space.

The open space has been planned for two phases. There is the overall landscape masterplan for the entire site which provides an attractive link the central spine of the development linking phases 1 and 2 of the masterplan together. In addition to providing a central high quality landscaped route through phases 1 and 2 of the development, the landscaping along the riparian way has also been planned in two phases, with the initial phase providing an attractive entrance space to the south along leading to the main public plaza to the north east of the site, while in the longer term when the second phase of the masterplan is developed an attractive riverside walk is developed.

The current application provides the first phase of this central spine of the development, with an attractive soft landscaping along the existing boundary between the two phases. This soft landscaping can be re-located and reused within the long term development, when phase 2 is permitted.

The scheme at surface level is car free. There are 2 no. vehicular accesses into the site both of which access directly the undercroft and basement car parking. Other than for emergency access the surface of this development is free from vehicles. This in turn provides a safe relaxing environment with ample public and communal open space.

Blocks A, B and C benefit from having podium level communal open space enabling the exclusion of cars from the development and also providing very private communal open space which is not readily visible from the road or from the public areas surrounding the development.

The main area of central public open space is located between Blocks C and D. This public open space is in the heart of the scheme and will be highly active. The 3 no. retail units and the creche all have access to this area. This area will cater for a range of people through a broad range of uses such as seating areas, kick about area, table tennis, basketball area, play areas to cater for different ages.

This central public open space branches off to the rest of the scheme through a completely pedestrianised network. A green route is provided to the south and west of Blocks A, B and C which links the central public open space with the stair cores to internal apartments and access to communal courtyards throughout this block as well as to the wider surrounding area. This green route also provides for an outdoor gym, kick about area, and other amenity areas. This route as mentioned above is completely car free and will be an attractive place for walking and jogging.

Directly south of the central open space is the communal open space at surface level for Blocks E and F. This area provides flexible lawns, play and seating areas. To the south of the site there is another

area of public open space. This area along the River Tymon/Poddle has excellent biodiversity with 10 metre riparian strip with retained mature trees and hedgerows. The proposal also includes a new pedestrian crossing point, over Greenhills Road, to link into the riverside walk to the east of the development through Bancroft Park.

All open spaces are easily accessed with strong pedestrian links to the proposed residential units and to the wider Greenhills Road and Airton Road areas. In addition to the pedestrian links mentioned above future possible connection points have been enabled throughout the scheme which will link up with possible future developments to the west of the site. All open space is overlooked by the residential units within the scheme.

The proposed routes through site also link in a logical manner to the surrounding area, in particular the green link through Bancroft Park located to the east and also into the Technological University Dublin, Tallaght.

All of the units have access, from their living room, to a private balcony or terrace. These areas of private open space have been located to ensure that they have sufficient privacy as to enable the enjoyment of future residents of these units. At ground floor level and at podium level additional planting has been provided as a buffer zone to these private spaces to ensure that they are useable, enjoyable spaces to be in.

#### Aspect

In total, 219 apartments are dual aspect (43.8%) while the remaining 281 are single aspect (56.2%). This is in excess of the minimum 33% dual aspect required for apartment developments required at Central/Accessible Urban locations. Of the single aspect units none are north facing. The single aspect apartments all overlook open spaces which provides a pleasant landscaped area. The width of these units are large size with large windows ensuring that these units will be bright and will benefit from a source of constant daylight.

#### Unit Sizes

The average 1-bedroom size within the proposed development is 49.5sqm which is 10% more than the minimum standards set by the Design Standards for New Apartments 2018. The average 2 bedroom size is 81.1sqm and the average 3 bedroom size is 100sqm, both of which are 11% above the minimum requirements for 2 and 3 beds required within the Apartment Guidelines. Please see the Housing Quality Assessment for a full breakdown of each apartment.

## **VISUAL IMPACT ASSESSMENT**

The proposed development will be a significant new apartment development of scale replacing the vacant and low scale manufacturing buildings. This site and the surrounding area is not considered visually sensitive location – there are no protected views, protected structures on site or in the vicinity, and the site is not within an Architectural Conservation Area.

The proposed development is located in an area that currently comprises educational, recreational, commercial and employment uses. It is a designated regeneration area and new development is expected to bring forward buildings of scale along with strong urban frontage and significant improved streetscape.

The views from the surrounding areas and public footpaths will be improved as a vacant, derelict site will be replaced by attractive residential development in this area. The proposed development will

have high quality materials throughout and high quality landscaping. The overall effect of this proposal, when viewed from the surrounding areas is considered to be strongly positive. The application is accompanied by Photomontages prepared by 3D Design Bureau demonstrating the positive impact the development will have on the surrounding area.

## CHILDCARE FACILITIES

As part of the application a childcare facility (c. 329sq.m) has been provided. This facility will have 4 no. classrooms and can accommodate 44 no. children. The unit mix of the proposed development is 197 no. 1 Bed, 257 no. 2 Bed and 48 no. 3 Bed apartments. As the development comprises largely of 1 and 2 Bed units a creche of this scale is appropriate. This facility will cater for the demand for childcare places generated from the proposed development.

## TRANSPORT

The scheme has 202 no. car parking spaces located at undercroft level of blocks A, B and C and at basement level of blocks E and F. It is accepted that this is below the standards set out in the South Dublin Development Plan however, as the subject lands are located beside excellent sustainable transport infrastructure it is considered that this level of car parking is ample. The Transport Impact Assessment has reviewed the development in terms of levels of car parking, the rate of growth of car ownership as part of this scheme and the access arrangements to the car parking. This report demonstrates that the level of car parking and access point is acceptable.

Furthermore, it is note that on Belgard Gardens SHD the inspector noted with regard to reduce car parking that *“car ownership does not necessarily equate to frequent car use and 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... the subject site comprises an appropriate location where such car parking provision would be appropriate with the provision in the proposed scheme substantially reduced comprising 0.24 spaces per unit. I consider that if a substantially reduced provision of parking is not appropriate on a site like this then it is unclear where it would be appropriate.”*

This application site is located c. 900m away from Belgard Gardens SHD site, so the same principle of reduced car parking is appropriate for this site. However, the parking ratio on this application site is slightly higher in order to acknowledge the slight increase in distance to the nearest luas stop for the application site. The ratio of 0.4 car parking space per unit is considered to be appropriate.

As an alternative to private car ownership it is proposed to provide 10 no. car club vehicles to cater non-work related car demand of the residents. This demand will be monitored on an ongoing basis by the management for the development and number of spaces can be increased as required.

584 bicycle parking spaces are proposed within the scheme which exceeds the minimum standards set out in the Development Plan. Secure bicycle parking is provided at undercroft level for the residents and visitor bicycle stands located throughout the site at surface level. The proposed scheme has been designed to provide fully integrated and safe bicycle paths, allowing ease of access throughout and secure bike parking facilities.

## NOISE REPORT

Traynor Environmental Ltd have completed Chapter 8 of the Environmental Impact Assessment Report which assesses the noise impacts. It has recommended that monthly noise monitoring surveys are carried out during the construction and demolition phase of development. During the operational phases it is noted that the residential development will not increase the noise levels at any noise



sensitive locations. It also notes that no noise mitigation measures are deemed necessary for the development.

## DAYLIGHT AND SUNLIGHT

A Daylight & Sunlight Analysis has been carried out by IN2 Engineering Design Partnership. This report assesses the predicted daylight availability for the proposed Airton Road development scheme. Analysis was based on drawings and 3D Model received from Ferreira Architects on 18<sup>th</sup> December 2019.

Sunlight availability to the amenity spaces was assessed against the BRE guideline criteria target of 50% achieving 2-hours sunlight on March 21st. The amenity spaces exceed this requirement achieving in excess of 97% sunlight availability. The Shadow Analysis illustrates no significant impact onto adjoining buildings as a result of the proposed scheme.

The internal daylight was assessed to determine how the arrangement and layout of the proposed development effected the quality of the internal living spaces. All spaces were assessed against the minimum daylight requirements as prescribed by the BRE. The analysis determines that 97.4% of rooms within the apartment blocks exceeded the minimum BRE requirements (1314 of 1349 rooms).

Overall the finding demonstrated that the proposed development performance is in line with BRE recommendations in the BRE "Site Layout Planning for Daylight and Sunlight" guide.

## MICROCLIMATIC WIND ANALYSIS AND PEDESTRIAN COMFORT REPORT

An analysis of wind and associated pedestrian comfort has been carried out for the development by IN2. This report found that the predicted pressure differentials and associated air velocities were not excessive around the development.

With regard to predicted pedestrian comfort the proposed development was *"predicted to not negatively impact on the micro-climate at ground level with respect to buildings with no areas determined as being 'Not Suitable for Pedestrian Comfort' in accordance with the Lawson Criteria utilised within the analysis. All amenity spaces and balconies in the proposed development had were determined to be suitable for either 'Long' or 'short term sitting' in accordance with the methodology. The analysis identified relatively sheltered conditions for Block D roof terrace, as the building mass of Blocks A, B and C in the proposed development provides sheltering from prevailing W/SW wind direction. The analysis also demonstrated that localised landscaping effects as proposed for the development were found to mitigate against pedestrian discomfort, in particular to the walkway adjacent to basement car park ramp located at the under-croft below Block F."*

## ENERGY STATEMENT

An Energy Statement has been prepared for this development. The strategy for this site has been approached in a holistic manner using the energy hierarchy of "Be Lean, Be Clean, Be Green" in order to ensure a sustainable development while also meeting the requirements of Part L.

The design and layout of this development places a high emphasis on passive solar design, combining external local shading with high performance glazing in order to minimise solar heat gain while also maximising natural daylight access.

A key feature of the energy efficient design of Greenleaf Homes Ltd. Include enhanced building fabric performance, mechanical ventilation heat recovery, hot water pump systems, electric radiators, and high efficiency lighting with occupancy and daylight controls where applicable. The proposed energy

as detailed in the accompanying report is compliant with the requirements of Part L and achieves NZEB.

### COMPLIANCE WITH PART V

The applicant has allocated 50 no. units for Part V on-site. The 50no. Part V units are identified on the attached Architects Drawings. These units are indicated on the associated plans submitted as part of this pre-application. The costings of the Part V units are attached in the Part V planning pack. This is in accordance with the Part V of the Planning and Development Act 2000.

### APPROPRIATE ASSESSMENT SCREENING REPORT

An Appropriate Assessment Screening Report has been carried out for this site. It has found that this development occurs on a site that is of low biodiversity value and is not directly adjacent to any SAC.

The conclusion of the report finds that the project has been screened for likely significant effects to the Natura 2000 network under the appropriate methodology. In view of best scientific knowledge and on the basis of objective information, it can be concluded that this application, whether individually or in combination with other plans and projects, will have no impacts upon the Natura 2000 sites. The integrity of these sites will be maintained, and the habitats and species associated with these sites will not be adversely affected. It is of the opinion of this author that this application does not need to proceed to Stage II of the Appropriate Assessment process.

### ENVIRONMENTAL IMPACT ASSESSMENT

This development exceeds both the 500-unit threshold and the 2ha threshold set out in Class 10, Part 2 of Schedule 5 of the Planning and Development regulations 2001-19 and as a result requires an Environmental Impact Assessment Report to be prepared. The EIAR submitted with the application considers the effects of the development on its environment and specifies remedial mitigation measures to address any potential negative environmental impact foreseen.

### CONCLUSIONS

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines.

The design and layout of the proposal is of high quality and makes the best use of available allocated brownfield land in line with current policy. It is a well-designed scheme that will provides a unique sense of place.

We trust the above and enclosed documentation and information provides a reasonable basis sufficient to allow the proposal to proceed through the Strategic Housing Development Application process and we look forward to hearing from An Bord Pleanála in relation to our request for a Pre-Application Consultation meeting.