

STATEMENT OF CONSISTENCY

Strategic Housing Development at
Former Gallaher's site, Airton

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1. INTRODUCTION

On behalf of Greenleaf Homes Limited this Statement of Consistency accompanies a planning application submitted to An Bord Pleanála in relation to a proposed Strategic Housing Development at the former Gallaher's cigarette factory 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 mixed use scheme includes 502 no. apartments, 3 no. retail units, a creche and associated communal facilities and is proposed on a brownfield site of c.2.79 ha. The site is bounded by Greenhills Road to the east and Airton Road to the north, to the south by the Institute of Technology Tallaght campus, and to the west by warehousing and industrial buildings. The wider area is predominantly characterised by a mix of employment, retail, local services and public spaces/recreational uses.

Currently the site contains vacant industrial buildings that were once part of a cigarette factory, which closed in 2003. There is an existing access to the site from Airton Road.

The site is located close to Tallaght village centre (c.0.5km to the south) and Tallaght Square (c.1.4km to the south-west). It is also well serviced by bus services along Greenhills Road whilst the LUAS is c.1.5km to the west. The existing bus routes along Greenhills Road are proposed to be further upgraded under Bus Connects and the proposed development is set back from the eastern boundary to maintain a land reservation for future CPO in associated with same.



Figure 1 Current site layout and existing buildings

This Statement of Consistency demonstrates that the proposal is in accordance with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy. It should be read in conjunction with the accompanying detailed documentation prepared by Ferreira Architects, McGill Planning, Traynor Consulting Engineers, Barrett Mahony Consulting Engineers, Mitchell Associates Landscape Architects, Whitehill Environmental Consultants, Tree Management Services - Arboricultural Consultants, IN2 Engineers and Renaissance Engineering.

2. DEVELOPMENT DESCRIPTION

The proposed development will consist of the following:

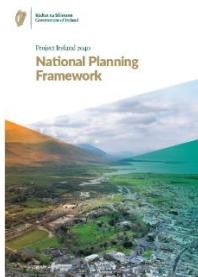
- Demolition of existing factory/warehouse buildings on site (total floor area c.10,076.8 sqm).
- Construction of 502 no. apartments (comprising 197 no. 1-bed; 257 no. 2-bed; and 48 no. 3-bed units) within 6 no. blocks ranging in height from 4 to 8 storeys. All residential units provided with associated 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.1,839 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).

3. NATIONAL AND REGIONAL PLANNING POLICY

The key national and regional policies and guidelines (including Section 28 Guidelines) relevant to the proposed development are as follows:

- *Ireland 2040 Our Plan - National Planning Framework (2018).*
- *Rebuilding Ireland – Action plan for housing and homelessness 2016.*
- *Regional Spatial and Economic Strategy 2019-31.*
- *Greater Dublin Area Transport Strategy 2016-35.*
- *Guidelines for Planning Authorities on Urban Development and Building Heights (2018).*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2018).*
- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual.*
- *Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities.*
- *Quality Housing for Sustainable Communities (2007).*
- *Design Manual for Urban Roads and Streets (2019).*
- *Guidelines for Planning Authorities on Childcare Facilities (2001).*
- *Smarter Travel – A New Transport Policy for Ireland (2009-2020).*
- *The Planning System and Flood Risk Management (2009).*

PROJECT IRELAND 2040 OUR PLAN - NATIONAL PLANNING FRAMEWORK (2018)



The National Planning Framework (NPF) is the Government's plan to cater for the extra one million people that is anticipated to be living in Ireland by 2040. The Eastern and Midland Region (including Dublin) will, by 2040, be a Region of around 2.85 million people, at least half a million more than today.

The NPF Strategy includes the following aims:

- Supporting the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city.
- Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.
- Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas.
- Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.

This major new policy emphasis on renewing and developing existing settlements aims to prevent the continual expansion and sprawl of our cities. This aim for Compact Growth promotes *"Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport."* This approach not only makes better use of land but it can also have a *"transformational difference"* to towns and villages bringing new life and footfall to an area and contributing to the viability of services, shops and public transport, and by increasing the housing supply, enables more people *"to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less"* (section 2.6).

As a result of this new policy approach, and as set out in section 4.5, there is a recognition that infill, and brownfield development is more challenging to deliver across multiple streams including land management and integration within existing communities who prefer the status quo to be maintained. As a result, to enable infill and brown field development a flexible approach to planning policies and standards needs to be *"focusing on design led and performance-based outcomes, rather than specifying absolute requirements in all cases... planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes."* In particular, Section 4.5 highlights that *"general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc."* It highlights that there *"should also generally be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs of all five."*

The NPF also states that *"to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas"*.

Key National Policy Objectives which relate to this site are set out below:

National Policy Objective 4

Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

National Policy Objective 11

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 13

In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

National Policy Objective 27

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.

National Policy Objective 33

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

Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

National Policy Objective 31

NPF emphasises the importance of “the provision of childcare facilities and new and refurbished schools on well located sites within or close to existing built-up areas, that meet the diverse needs of local populations”.

EVALUATION OF CONSISTENCY

The subject site is zoned REGEN the objective for which is ‘to *facilitate enterprise and/or residential-led regeneration*’. This brownfield site was once a cigarette factory. These structures have been vacant for several years. The development proposed on the site is consistent with the NPO which aims to provide 40% of new residential development within the footprint of existing cities.

NPO 35 and 33 emphasises locating residential developments in sustainable and accessible locations. The proposed development is a high-density residential scheme that will be close to employment areas, local retail and services, public spaces and recreational areas, high quality public transport and education.

The development proposed seeks to deliver an appropriate scale of residential development at the site that is well connected to Dublin city centre. The subject site is well connected via:

- Dublin Bus route 27 connects the site to Clarehall along Greenhills road every 10mins at peak times
- 25-30 mins to cycle into the city centre through dedicated cycle paths along Greenhills road and Crumlin road. It is worth noting that the building line of the development has been set back to accommodate a future Bus Connects Corridor along the Greenhills Road.
- LUAS Red line Tallaght square/Cookstown stop is 1.5km(10 – 15 mins walk) from the site

This site is designed with undercroft/basement parking at a ratio of 1:0.40 car parking spaces. This is in line with the flexible approach advised by the NPF.

There are multiple new public spaces within the development. A childcare facility is also proposed as part of the development. This will cater for approximately 44 children. This is in accordance with NPO31. Local retail and residential amenity facilities are also provided.

This high-density design is considered to make the best use of a brownfield site in a highly sustainable and accessible location. The varying building height will provide interest along the existing and new streets, while the taller elements will provide a strong urban signpost in the area. The provision of 502 residential units in a highly accessible location is considered to be fully in accordance with the recommendations of the NPF.

REBUILDING IRELAND – ACTION PLAN FOR HOUSING AND HOMELESSNESS 2016



Rebuilding Ireland was launched in 2016 with the objective to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021. It was based on 5 no pillars. Pillar 3 – Build More Homes aims to increase the output of private housing to meet demand at affordable prices.

The Action Plan puts locating houses in the right place at the centre as stated in page 24: *“locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision”*

EVALUATION OF CONSISTENCY

The proposed development is consistent with Pillar 3 to build more residential units in suitable urban locations. The proposed development provides for 502 no. new residential units. This will add to the housing stock and mix of the area.

GREATER DUBLIN AREA TRANSPORT STRATEGY 2016-35

The Greater Dublin Area Transport Strategy has been prepared by the National Transport Authority for Dublin, and the surrounding counties Meath, Kildare and Wicklow. With respect to Tallaght area the transport strategy identifies the demand in the area for higher quality of service and recommends an objective to increase the capacity of LUAS Red line that connects Tallaght to Dublin City centre and also to provide a Bus Rapid Transit system connecting Tallaght town centre to the city centre.

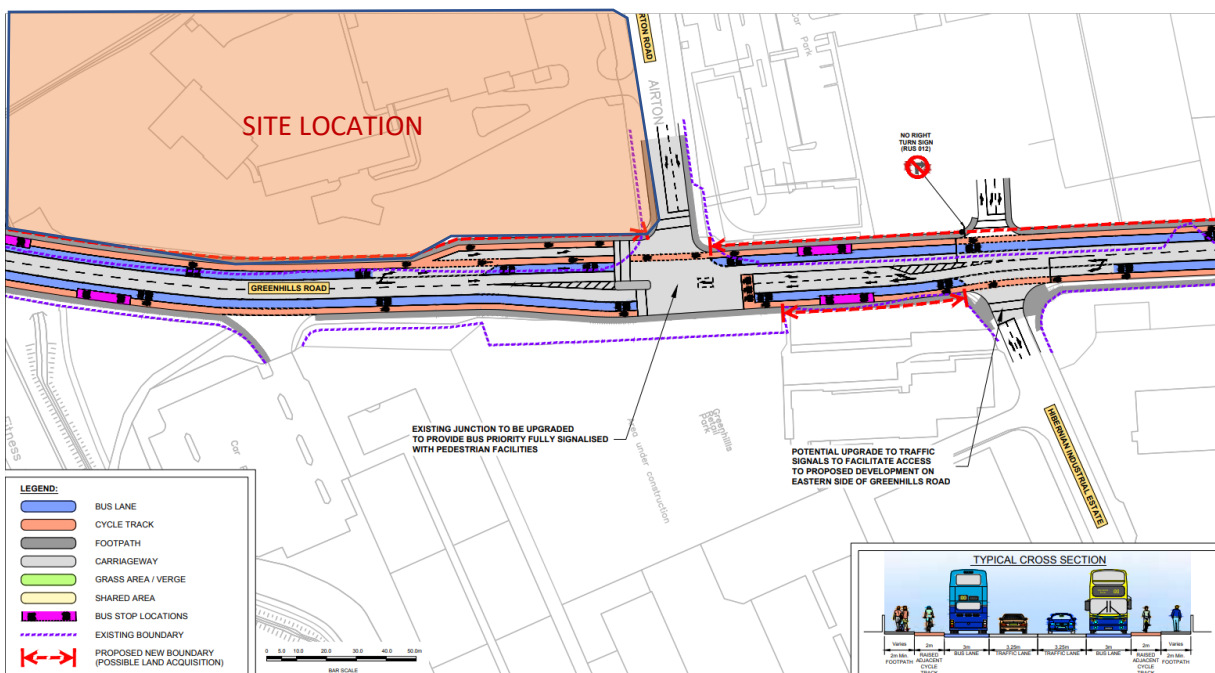


Figure 2 Proposed Bus connects route passing through Greenhills road

EVALUATION OF CONSISTENCY

This proposed development, due to its location, along the high frequency bus corridor, which may be upgraded along Greenhills road in line with Bus Connects plans, its proximity to LUAS red line and cycle links makes the development a sustainable and appropriate location in accordance with the Greater Dublin Area Transport Strategy.

Both of the proposed upgrades to the redline LUAS and also to provide a Bus Connects Route also will benefit the proposed residential development. It is worth noting that as part of the Greenhills Road Bus Connects improvements under route 9, some of the site will be required to enable the road widening. To this end the buildings have been sited with an increased set back from the road to facilitate this when it is delivered.

REGIONAL SPATIAL AND ECONOMIC STRATEGY 2019-31



Under the Local Government Reform Act 2014 the Regional Planning Framework has been revised with the previous Regional Authorities/Assemblies (ten in total) now replaced with three Regional Assemblies. The Regional Authorities for the Greater Dublin Area – The Dublin Region and the Mid-East Region - have been replaced by the Eastern and Midland Regional Assembly (EMRA).

The Regional Spatial and Economic Strategy was adopted on the 28th June 2019 and is a strategic plan and investment framework to shape the future development of the eastern regional to 2031 and beyond which is a new concept in Irish Planning tying spatial planning to economic factors. The region covers nine counties, Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, and Dublin.

The RSES will support the implementation of Project Ireland 2040. It addresses employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development and climate change. The vision for the RSES is to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.

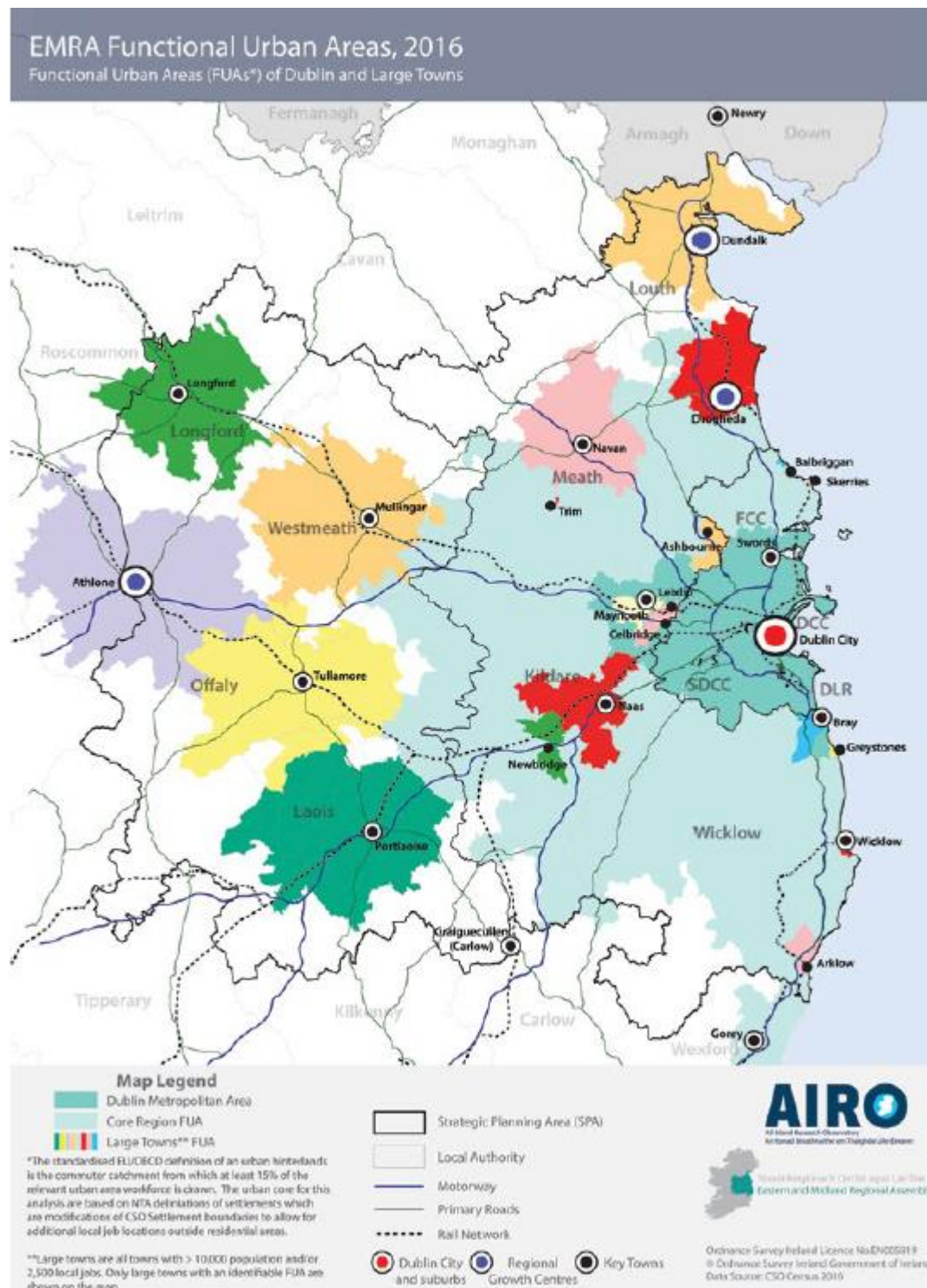


Figure 3 Functional Urban areas within EMRA (Source RSES 2019)

The central need identified by the RSES is ‘to be people focused as quality of life encapsulates strong economic output and stability, good environmental performance and good standard of living for all.’ RSES Settlement Strategy supports, and as set out in Regional Policy Objective 4, the consolidation and redevelopment of infill, and brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs. The aim is to have **“50% of all new homes to be provided in the existing built up area of Dublin City and Suburbs in tandem with the delivery of key infrastructure to achieve a population of 1.4 million people by 2031.”**

RPO 4.3 supports development of brown field sites as follows:

‘Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.’

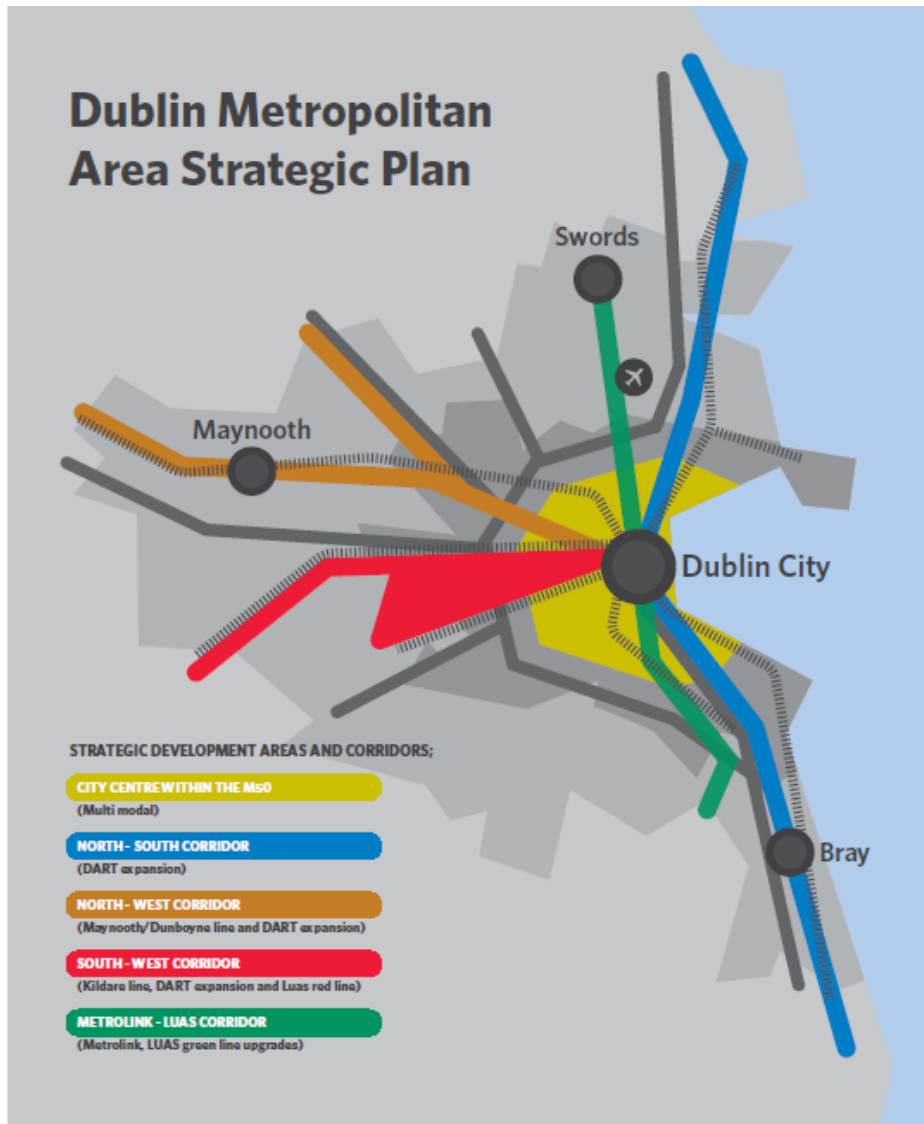


Figure 5.2 Dublin Metropolitan Area Strategic Plan

Figure 4 Dublin Metropolitan Area Strategic Plan (Source RSES 2019)

Section 5.4 identifies the Metropolitan Area strategy and development corridors. This includes the South West corridor which has been identified as strategic development corridor for the DART expansion and LUAS red line supported by additional bus connections. Regeneration of the brown field sites in Tallaght along with other South western corridor sites has been identified to provide for a total population capacity of 66,000(as per Table 5.1). MASP has identified brownfield sites in Tallaght along with other SDZ locations in Dublin as strategic residential development opportunities.

Section 5.3 sets the Guiding Principles for the growth of the Dublin Metropolitan Area. Some of these principles include:

- **Compact sustainable growth** - Promote consolidation of Dublin city and suburbs, refocus on the development of brownfield and infill lands to achieve a target of at least 50% of all new

homes within or contiguous to the existing built up area in Dublin and at least 30% in other settlements.

- ***Integrated transport and land use*** – Target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects including Bus Connects, DART expansion and Luas extension programmes and the Metro Link, along with better integration between networks.
- ***Accelerate housing delivery***– Activate strategic residential development areas and support the steady supply of sites to accelerate housing supply and the adoption of performance-based standards to achieve higher densities in the urban built up areas, supported by better services and public transport.
- ***Co-ordination and active land management*** - enhanced co-ordination across Local Authorities and relevant agencies to promote more active urban development and ***land management policies that focus on the development of underutilised, brownfield, vacant and public lands.***

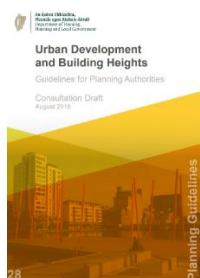
RSES along with the NTA and Local Authorities have developed Guiding Principles for Integration of Land Use and Transport in the region. They include the following:

- ***For urban-generated development, the development of lands within or contiguous with existing urban areas should be prioritised*** over development in less accessible locations. Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.
- ***Planning at the local level should prioritise walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools.***
- ***Support the '10 minute' settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.***
- ***Cycle parking should be appropriately designed into the urban realm and new developments at an early stage to ensure that adequate cycle parking facilities are provided.***
- ***Support investment in infrastructure and behavioural change interventions to encourage and support a shift to sustainable modes of transport and support the use of design solutions and innovative approaches to reduce car dependency***

EVALUATION OF CONSISTENCY

The proposed scheme is a brownfield site within the Dublin Metropolitan Area located in close proximity to existing and proposed high capacity transport corridors that link the site to Tallaght Village, Hospital, TU Dublin and commercial areas and to Dublin city centre. The proposed scheme will establish a large residential development close to major centres of employment retail and education. The site is a highly accessible site by both pedestrians and cyclists as well as public transport. There are a wide range of services within a 10 to 15 minute walk of the site. The scheme is a well-designed and appropriately located site that meets all of the criteria set out in the principles of the RSES – allowing for compact development on brownfield underutilised lands which are readily accessible by a variety of modes of transport and to a range of existing services and facilities in the area.

URBAN DEVELOPMENT & BUILDING HEIGHTS: GUIDELINES FOR PLANNING AUTHORITIES, 2018



The Guidelines set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040. There is a presumption in favour of high buildings at public transport nodes and state that it is Government policy to promote increased building height in locations with good public transport services.

Under Section 28 (1C) of the Planning and Development Act 2000 (as amended), Planning Authorities and An Bord Pleanála are **required to have regard to the guidelines and apply any specific planning policy requirements (SPPR's) of the guidelines in carrying out their function. SPPRs as stated in the Guidelines, take precedence over any conflicting, policies and objectives of development plans, local areas plan and strategic development zone planning schemes.**

The Guidelines emphasise the policies of the NPF to **increase levels of residential development in urban centres and increase building heights and overall density** by both facilitating and encouraging the development of increased heights and densities by Local Authorities and An Bord Pleanála. It identifies the need to focus planning policy on *“reusing previously developed “brownfield” land, building up urban infill sites”*. With regard to major towns that has been identified for growth it is appropriate to support heights of at least 6 storeys at street level with scope of greater height subject to design parameters.

They place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks. *“In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors”*.

It goes on to highlight that *“the preparation of development plans, local areas plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights”*. It encourages local authorities away from setting generic maximum height limits across their functional areas identifying *“such limits, if inflexibly or unreasonably applied, can undermine wider national policy objectives to provide more compact forms of urban development as outlined in the National Planning Framework and instead continue an unsustainable pattern of development whereby many of our cities and towns continue to grow outwards rather than consolidating and strengthening the existing built up area. Such blanket limitations can also hinder innovation in urban design and architecture leading to poor planning outcomes.”*

Development management criteria set out in Section 3.2 asks planning applications to demonstrate that they satisfy the following criteria:

	CRITERIA	EVALUATION OF CONSISTENCY
SPR1	Support increased building height and density in locations with good public transport accessibility	The proposed development ranges in height from 4 to 8 storeys, with the increased height placed strategically within the development. The site is located on the Greenhills Road and has access to a range of high frequency bus services and also is in walking distance to the LUAS.
At the scale of the town	Site is well served by public transport with high capacity, frequent service and good links to other modes of transport	There are a number of Dublin Bus services operating in the vicinity of the site including nos. 27, 54a, 65, 75, 75a, 76, 76a, 77a, and 175 are all within 5 minutes' walk of the site.
	Successfully integrates into/enhances the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views.	The proposed development will make optimum use of a large vacant, brownfield site that is zoned for REGEN in a highly accessible area which is undergoing significant regeneration and change. There is well-established social infrastructure within walking distance of the site.
	Make a positive contribution to place-making	It is wholly appropriate for redevelopment to higher density mixed use residential use within this urban setting, creating a new urban quarter, providing access to services in the wider area. It will create a new focal point for the area with a variety of open spaces and pedestrian connections through the development.
At the scale of the neighbourhood	Responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.	The proposed development responds to the natural environment by providing new attractive routes and public spaces within the development. The aim is to retain as many of the existing trees as possible within the development to the south along the river. A series of open spaces and streets are created within the scheme. The development will act as a local nodal development at a strategic junction.
	The proposal is not monolithic and avoids long, uninterrupted walls of building.	The proposed apartment blocks are provided at a variety of heights and finishes making for a visually interesting residential development.
	Enhances the urban design context for public spaces and key thoroughfares	The proposed development will provide a series of public spaces that will be accessible to all, will provide through-access and will be overlooked by the proposed apartment blocks. Overall this will enhance the public realm in the area.

	Makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.	The new streets through the site will be overlooked by the apartment blocks. People will be able to navigate through the development to get to local retail and health services, public parks and recreational areas. This will ensure that the development integrates well with its existing environment.
	Positively contributes to the mix of uses and/or building typologies available in the neighbourhood.	The scheme contributes to an overall sustainable mix of residential types in the area by introducing a significant apartment development.
At the scale of the site/building	Form, massing and height should be modulated to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light	The form, massing and height have been designed to optimise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.
	Regard should be taken of quantitative performance approaches to daylight provision	A daylight/ sunlight assessment was carried out by IN2 to ensure daylight is optimised throughout the site. The layout and design of the scheme will enable sufficient sunlight and daylight into the apartments, communal open space and public open spaces.
Specific Assessment	Specific impact assessment of the micro-climatic effects such measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.	The height and orientation of the proposed blocks indicates that the development is unlikely to create negative local wind microclimate impacts. This has been confirmed by the Microclimatic Wind Analysis and Pedestrian Comfort Report submitted.
	Development locations in proximity to sensitive bird/bat areas need to consider the potential interaction of the building location, materials and artificial lighting.	The site and location have been assessed from an ecological perspective and in relation to potential impact on European sites, bats, birds and other fauna. We refer to the submitted EIAR Summary submitted with this application.
	Relevant environmental assessment requirements.	

EVALUATION OF CONSISTENCY

It is considered that the subject site, a prominent corner site, is an appropriate site for taller development. The blocks proposed within the scheme are arranged in 6 blocks with heights from 4 to 8 storeys. The proposed height is also reflective of recent SHD's in the area which have been permitted (Belgard Gardens SHD measuring up to 9 storeys) and proposed, Airton Plaza which has a proposed height of up to 9 storeys.

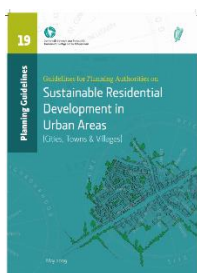
The proposal responds to the changing nature of the regeneration area while also taking into account the existing natural and built environment and it makes a positive contribution to the urban context. The proposed open spaces and active ground floor uses will create an attractive setting and enhance the sense of place. The heights, ranging from 4 to 8 storeys will provide visual interest to the street scene and will also provide a sense of enclosure to Airton Road and Greenhills Road, both of which are wide roads. It is felt that this increase in height will provide a strong and appropriate urban edge to this location.

The materials and finishes of the proposed blocks will be designed to a high architectural standard.

An assessment of access to natural daylight, views and ventilation has been conducted for the proposed units within the scheme. The open spaces areas achieve in excess of 97% sunlight availability (50% is the require pass/ fail target). In terms of internal daylight, it was found that 98% of all of the rooms in the apartment's blocks exceeded the minimum BRE requirements.

It is respectfully submitted that the proposed development accords with the policies of the Building Height Guidelines and National Planning Framework. The provision of residential development at this location is supported by the height guidelines. This site is appropriate for an increase in height when examined at a city/ town scale; at a district/ neighbourhood/ street scale and at a site/ building scale.

GUIDELINES FOR PLANNING AUTHORITIES ON SUSTAINABLE RESIDENTIAL DEVELOPMENT IN URBAN AREAS, 2009



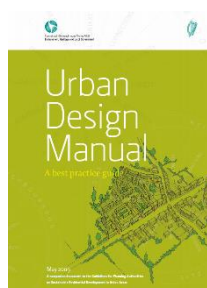
The guidelines set out the key planning principles to be reflected in development plans and local area plans, to guide the preparation and assessment of planning applications for residential development in urban areas.

The Guidelines elaborate a range of high-level aims for successful and sustainable residential development in urban areas. These are assessed against the proposed scheme as follows:

GUIDANCE	EVALUATION OF CONSISTENCY
<i>Prioritise walking, cycling and public transport, and minimise the need to use cars;</i>	<p>The application site is well served by good quality walking and cycling routes that connect the development with the Tallaght town centre, Tallaght village, local employment and other services.</p> <p>The development provides car parking at a ratio of 0.4 which is considered acceptable for this highly accessible location.</p>
<i>Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;</i>	<p>The scheme has been designed to the highest residential standard. All units accord with the quantitative and qualitative standards sets down in the national guidelines and South Dublin County Council Development Plan 2016.</p>

<p><i>Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;</i></p>	<p>The development will consist of apartments, gym, creche, communal facilities, public open spaces and retail outlets.</p> <p>The development is also well located in relation to existing/planned social infrastructure in the locality particularly and with respect to major employment centres and commercial centres located at reasonable distance of the site providing for a range of community facilities.</p>
<p><i>Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;</i></p>	<p>This significant development will establish a new sense of place for the area with a series of new public routes through the development connection to local employment, services and amenities. High quality building and landscape materials will create an attractive new urban location.</p>
<p><i>Are easy to access for all and to find one's way around.</i></p>	<p>The development has been designed in 6 blocks that steps up in floors from 4 to 8 storeys in height. The blocks will have communal landscaped open areas associated with each block and undercroft or basement level car parking facilities. The layout provides an uncomplicated and logical approach, making wayfinding simple. The undercroft/ basement parking also ensures that the development is car free, and a safe, pleasant, tranquil environment for people to enjoy.</p> <p>The public open space is provided at ground level with access from the retail outlets and creche.</p> <p>Pedestrian and vehicular access into the site has been provided at multiple points along Airton road and Greenhills road. Additional emergency accesses have also been provided for the site from both the roads.</p>
<p><i>Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;</i></p>	<p>The proposal seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity and minimise impacts of climate change in accordance with current buildings regulations.</p>
<p><i>Provide a mix of land uses to minimise transport demand;</i></p>	<p>The site is zoned as REGEN lands 'to facilitate enterprise and/or residential-led regeneration'. The proposed scheme on the site is for a mixed-use development that will consist of 502 units, 3 retail units, a creche and other communal services. Retail units are located to the corner of Airton road and Greenhills road ensuring visibility of the retail element and providing activity at this junction. Access into the development has been provided along both the roads to increase permeability into the site and accessibility to public transport corridors. Cars cannot</p>

	drive through the development; however, the site is highly permeable to pedestrians and cyclists.
<i>Promote social integration and provide accommodation for a diverse range of household types and age groups;</i>	This apartment development will further improve the quantum and mix of residential types available in the Greenhills Road/Tallaght Village area and will provide opportunities to a greater demographic range.
<i>Enhance and protect the green infrastructure and biodiversity; and</i>	The proposed development seeks to preserve the existing mature trees and protect the riparian corridor to the south and west of the site.
<i>Enhance and protect the built and natural heritage.</i>	There is no built heritage on site. The proposal will significantly enhance the vacant, brownfield site and will protect the biodiversity in the southern section of provide new green links through the development.



URBAN DESIGN MANUAL – A BEST PRACTICE GUIDE, 2009

The Urban Design Manual is the accompanying document to the Sustainable Residential Development in Urban Areas document which provides policy guidance for the creation of successful neighbourhoods having regard to the 12-point criteria. The proposal complies with the following design criteria:

1. Context –How does the development respond to its surroundings?	
	EVALUATION OF CONSISTENCY
<i>The development seems to have evolved naturally as part of its surroundings.</i>	<p>The proposed scheme complements the newer buildings opposite to the site along Airton road. A key objective for the proposed scheme was to help densify the area, provide a greater mix of unit type, and provide active streetscapes and better sense of place.</p> <p>The proposed scheme seeks to retain the mature trees within the development. Main public open spaces are provided within the development as two central courtyards, between blocks C and D, and to the south of block A/B/C. This will include grass kick about spaces and a play area that will include basketball hoops, table tennis facilities, and children’s playground.</p> <p>In addition to this the proposal provides communal open space at first floor level, above the undercroft parking, for blocks A, B, C, and basement car parking</p>

	<p>for E and F. Communal open space for the block D is at roof terrace level.</p> <p>Another public open space is also proposed along Greenhills road at the southern boundary of the development which will integrate the riparian corridor and existing mature trees.</p>
<p><i>Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users.</i></p>	<p>The proposed development is located within a former industrial estate site. The site is currently zoned for regeneration which includes residential uses. The site is surrounded by institutional and commercial buildings, there are no existing residential uses in the area. The location of the proposed building and the distance to the neighbouring properties ensures that it will not have a detrimental impact on the existing neighbouring development.</p> <p>The site is of a size and scale that it can readily accommodate the proposed development. The building height provides a sense of place and enclosure to the existing road network and provides surveillance and security in an area where it was lacking.</p> <p>The development will also provide a public plaza and other public open spaces as well as permeable links through the site which will provide benefit to the wider area.</p>
<p><i>Form, architecture and landscaping have been informed by the development's place and time.</i></p>	<p>The design and density of the development reflects the context of the site and planning strategy for the area. It is a modern and high-quality scheme reflecting the type of development that is currently proposed elsewhere in the surrounding area.</p> <p>The height, scale and massing are considered appropriate given its context within the site and the surrounding developments in the wider area.</p>
<p><i>The development positively contributes to the character and identity of the neighbourhood.</i></p>	<p>The proposal creates an identity and a sense of place for the neighbourhood. The proposals is designed to have varying heights and broken up blocks and massing in order to integrate into its urban context and respects the existing characteristic of the site. The existing trees and the river to the south are enhanced. The proposed scheme will reuse a vacant, unattractive, underutilised site and transform it to a development that will contribute positively to the neighbourhood.</p>

<i>Appropriate responses are made to the nature of specific boundary conditions.</i>	The development has been designed around the site constraints and existing boundaries. The proposed boundary treatments will enhance the site and protect the landscape features that are significant to the character of the area.
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2. Connections – How well connected is the new development	
	EVALUATION OF CONSISTENCY
<i>There are attractive routes in and out for pedestrians and cyclists.</i>	The pedestrian and cycle access to the site has been provided at multiple locations along Airton road and Greenhills road. The blocks will have pedestrian routes running through and around them to increase the permeability of the scheme. The cars are parked in undercroft/ basement parking resulting in a car free development, which is tranquil and promotes cycling and walking through the site.
<i>The development is located in or close to a mixed-use centre.</i>	The site is located at c.650m from Tallaght Main street. The scheme is also located at less than 1.5km from Tallaght square which is a main retail and commercial hub.
<i>The development's layout makes it easy for a bus to serve the scheme.</i>	The development has been set back from Greenhills Road to allow for the future Bus Connects proposal to be achieved. There are existing bus stops along Greenhills Road which the future residents can use.
<i>The layout links to existing movement routes and the places people will want to get to.</i>	The layout promotes people to use sustainable means of transportation connecting with existing cycle paths running along the site boundary on Greenhills road. Pedestrian permeability through the site is promoted in the residential layout enabling future residents to access the development from multiple points to access the existing network of pedestrian, cycle and public transport facilities.
<i>Appropriate density, dependent on location, helps support efficient public transport.</i>	The density and quantum of development will provide a new and significant residential community directly adjoining a high frequency Dublin bus route (27) that connects the Tallaght area with Dublin City Centre, and which will be further enhanced with the delivery of Bus Connects.

3. Inclusivity – How easily can people use and access the development?	
	EVALUATION OF CONSISTENCY
<i>New homes meet the aspirations of a range of people and households.</i>	A variety of unit types has been proposed with the scheme that will include 51% 2 bed units, 39% 1 beds and 10% 3 bed units. The range of unit types will allow more flexibility for housing different household types particularly those seeking to get on the property ladder. This will facilitate a wide range of homeowners including individuals, couples, empty nesters, and families. The development will allow for families and individuals to upsize or downsize within the area.
<i>Design and layout enable easy access by all.</i>	The proposal has been designed for ease of access throughout the site in accordance with Part M of the building regulations.
<i>There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly.</i>	The scheme will provide a variety of open spaces that including public, communal and private amenity spaces for a range of different ages including children, adults and the elderly. The open areas will include provisions for active recreation, meadow areas, natural woodland play areas, as well as more intimate and formal landscaped spaces. All of the open spaces are overlooked by the residential units offering great passive surveillance.
<i>Areas defined as public open space that have either been taken in charge or privately managed will be clearly defined, accessible and open to all.</i>	The open spaces will be publicly accessible. Crossings to these spaces will be denoted by a change in the landscaping. All dwellings have ease of access to these areas. It is also easily accessible from the surrounding area. All of the open spaces are easily accessible and are overlooked by the development creating a safe and secure environment.
<i>New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers.</i>	The layout is designed to maximise visual and physical fluidity throughout the scheme. From the CGI's it can be seen that the scheme will enhance the streetscape. The proposed design will provide strong urban edge to the Airton/Greenhills road junction by the development of 8 storeys.

4. Variety – How does the development promote a good mix of activities?	
	EVALUATION OF CONSISTENCY
<i>Activities generated by the development contribute to the quality of life in its locality.</i>	The proposal will contribute to the housing mix of the area and will increase population creating additional demand for educational, sports and retail services all of which are provided close to the development.
<i>Uses that attract the most people are in the most accessible places.</i>	A variety of open spaces are provided throughout the scheme that will include a range of spaces for all age groups including open spaces with child’s play areas, flexible lawns, kickabout areas and seating areas. All of these spaces will be easily accessible and well overlooked.
<i>Neighbouring uses and activities are compatible with each other.</i>	The site is located within an area zoned for residential led regeneration, with other high-density schemes being granted permission to build in the vicinity. The existing uses immediately surrounding the site are commercial and educational, which are compatible with residential development.
<i>Housing types and tenure add to the choice available in the area.</i>	A variety of dwellings are provided which will further improve the range of unit types available in the area. The proposed scheme will add to the residential mix of the neighbourhood and further improve the availability of a range of unit types to various types of households. Please refer to the accommodation schedule for more information.
<i>Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.</i>	Proposed scheme is for mixed use development that will provide for 502 residential units, gym, creche, and 3 retail outlets. The scheme is at an accessible location close to Tallaght Main street. Kilnamanagh Tymon Primary health centre is located to the opposite of the site. The proposed new retail outlets and gyms will further enhance the existing provision in the area. Future Analytics report indicates that there is a need for some local neighbourhood centre type uses such as barbers, pharmacies, small shops etc.

5. Efficiency - How does the development make appropriate use of resources, including land?	
	EVALUATION OF CONSISTENCY
<i>The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design.</i>	The overall density proposed for the site is c.202uph this is considered to be appropriate for the site given the proximity of the site to public transport, employment and local services.
<i>Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems.</i>	The proposals provides for 27% of the area to be provided as public open space. These spaces will provide active and passive recreational facilities for all age groups. The landscaped areas provided within the scheme promote biodiversity and providing residential amenity. The scheme also incorporates SUDs scheme into the design by means of Green roofs, permeable/ porous paving, soft landscaping and retention basins.
<i>Buildings, gardens and public spaces are laid out to exploit the best solar orientation.</i>	The layout of the scheme is to ensure that the taller blocks are along the northern boundary with gaps/ reduced height for blocks which are south facing. This ensures that light can penetrate through into the central courtyards. The open spaces all have south facing aspects. A significant portion (43.8%) of the apartment across the scheme are dual aspect. This is in excess of the 33% minimum required for Accessible Urban Locations under the Apartment Guidelines. Internal Daylighting Analysis for the development and BRE Best Practice compliance were assessed and found to achieve in excess of 98% of living areas and bedrooms, ensuring all units and open spaces have sufficient sunlight and daylight provision.
<i>The scheme brings a redundant building or derelict site back into productive use.</i>	The site has remained vacant since the closure of the factory unit and warehouses on the site in 2003. The proposed works will ensure that the new use will complement and play a part in regeneration of the wider site and add to the vitality of the neighbourhood.
<i>Appropriate recycling facilities are provided.</i>	Communal recycling facilities are provided in the bin stores located on Ground floor of the site.

6. Distinctiveness - How do the proposals create a sense of place?	
	EVALUATION OF CONSISTENCY
<i>The place has recognisable features so that people can describe where they live and form an emotional attachment to the place.</i>	The development is defined by a series of apartment blocks that overlooking an axis of public, car free routes and open spaces that provide a unique sense of place and a distinctive character.
<i>The scheme is a positive addition to the identity of the locality.</i>	The site is currently vacant. The proposal will provide an appropriate scale and quantum of residential development on a key site close to Tallaght Town Centre and close to public transport and local services.
<i>The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout.</i>	The proposed layout adapts to the site boundaries while also taking into account existing neighbouring properties. All the proposed open spaces and plazas are overlooked providing passive surveillance around the entire site.
<i>The proposal successfully exploits views into and out of the site.</i>	As can be seen from the contiguous elevations and the proposed plans the views have been carefully considered in order to enhance the area and it is sensitive to the character of the surrounding area.
<i>There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre.</i>	The central public open space between Block C, D & E marks the congregation of several pedestrian routes through the site and will provide a focal point within the scheme.

7. Layout - How does the proposal create people friendly streets and spaces?	
	EVALUATION OF CONSISTENCY
<i>Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.</i>	Pedestrian permeability is a key design outcome for the scheme. All cycle and pedestrian paths have been designed to follow anticipated desire lines. This has been continued through to the proposed masterplan area that includes the adjoining lands to the west which will be the subject of a separate application in the future.
<i>The layout focuses activity on the streets by creating frontages with front doors directly serving the street.</i>	The scheme focuses on bringing activity on to the streets. The proposed scheme has optimised permeability into the site by creating multiple

<p><i>The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.</i></p>	<p>pedestrian and cyclist entry ways. The use of retail, creche and gym activities at the ground floor ensures an active street frontage throughout.</p> <p>This is a car free development, with all the cars located in undercroft/ basement parking areas which are accessed directly from the Greenhills Road entrance or Airton Road entrance. This has resulted in a development that is safe and enjoyable for pedestrians and cyclists to use.</p>
<p><i>Traffic speeds are controlled by design and layout rather than by speed humps.</i></p>	<p>As set out in the Traffic and Transport statement the scheme has been designed in line with DMURS and ensures that the development is not dominated by cars but instead is a well landscaped pleasant environment to be in. There are no roads running through the scheme other than pedestrian and cycle routes which can be used for emergency access.</p>
<p><i>Block layout places some public spaces in front of building lines as squares or greens, and some semi-private space to the back as communal court.</i></p>	<p>The open space strategy for the scheme creates multiple open space areas of varying uses and sizes. This can be seen in the landscaping masterplan by Mitchell and associates landscape architects.</p>

<p>8. Public Realm - How safe, secure and enjoyable are the public areas?</p>	
	<p>EVALUATION OF CONSISTENCY</p>
<p><i>All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.</i></p>	<p>All open and landscaped spaces are overlooked and surveyed by the residential units surrounding them.</p>
<p><i>The public realm is considered as a usable integrated element in the design of the development.</i></p>	<p>Public realm is integrated into the design of the development and forms part of the wider network of usable public spaces in the wider area.</p>
<p><i>Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood.</i></p>	<p>Children's play areas are facilitated.</p>
<p><i>There is a clear definition between public, semi-private, and private space.</i></p>	<p>Private open space is provided by balconies/ terraces. Communal open spaces for residents are in courtyards between the blocks and on roof terraces. Public open spaces are provided in the centre of the scheme that are accessible by public via separate entrances and to the south of the site. There is also a small urban public open space to the front of block D creating a sense of place on this corner of Airton Road and Greenhills Road.</p>

<p><i>Roads and parking areas are considered as an integral landscaped element in the design of the public realm.</i></p>	<p>The scheme has been designed to ensure that the car parking areas are segregated from pedestrians and cyclists and that all roads are for pedestrians and cyclists and are safe, legible and clear and are integrated into the public realm. Car parking is provided at undercroft level of Blocks A, B&C and at basement level under blocks E&F. This has enabled the provision of additional high-quality landscaping at first floor level throughout the development making the development a pleasant, peaceful location to be in. At ground floor level, the scheme is car free, and as a result enables the free movement and enjoyment of the spaces without vehicular traffic.</p>
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<p>9. Adaptability - How will the buildings cope with change?</p>	
	<p>EVALUATION OF CONSISTENCY</p>
<p><i>Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.</i></p>	<p>The apartment building has a lift built into it so the apartments can be adapted for all times of life.</p>
<p><i>The homes are energy-efficient and equipped for challenges anticipates from a changing climate.</i></p>	<p>Yes, design practices and proposed materials will militate against the effects of climate change.</p>
<p><i>Homes can be extended without ruining the character of the types, layout and outdoor space.</i></p>	<p>N/A</p>
<p><i>The structure of the home and its loose fit design allows for adaptation and subdivision, such as the creation of an annex or small office.</i></p>	<p>The apartments can be altered internally.</p>
<p><i>Space in the roof or garage can be easily converted into living accommodation.</i></p>	<p>N/A</p>

<p>10. Privacy and Amenity - How does the scheme provide a decent standard of amenity?</p>	
	<p>EVALUATION OF CONSISTENCY</p>
<p><i>Each home has access to an area of useable private outdoor space.</i></p>	<p>Yes, each unit has its own private open space in accordance with the minimum residential standard.</p>
<p><i>The design maximises the number of homes enjoying dual aspect.</i></p>	<p>The significant portion of the units (43.8%) have dual aspect which exceeds with national policy for</p>

	accessible urban locations that requires minimum 33% of the units to be dual aspect.
<i>Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout.</i>	All units will be designed to prevent sound transmission in accordance with building regulations.
<i>Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units.</i>	Adequate separation distance between opposing windows is achieved and overlooking is not considered an issue.
<i>The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables.</i>	All units are designed in accordance with national design standards on storage areas.

11. Parking – How will the parking be secure and attractive?	
	EVALUATION OF CONSISTENCY
<i>Appropriate car parking is on-street or within easy reach of the home's front door.</i>	100% of the car parking is provided at undercroft/ basement level. This will provide for a safe and secure and accessible parking for the residents of the scheme. This is in line with current NPF policy. Please see the Traffic and Transport Assessment for further details.
<i>Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation.</i>	There is no on street parking in this development. All of the parking is within secure undercroft/ basement parking.
<i>Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.</i>	Parking for the apartments will be provided in undercroft/ basement parking.
<i>Materials used for parking areas are of similar quality to the rest of the development.</i>	Yes, the highest quality materials will be used throughout the scheme.
<i>Adequate secure facilities are provided for bicycle storage.</i>	Enclosed communal bike storage is provided in locations adjoining apartments units. In total there are 584 bicycle parking spaces provided in the scheme. Of these 505 spaces are allocated for residential purposes provided in enclosed facilities. 5 spaces each are provided for the creche and retail units as enclosed spaces. 74 spaces are provided as publicly accessible visitor spaces.

12. Detailed Design – How well thought through is the building and landscape design?	
	EVALUATION OF CONSISTENCY
<i>The materials and external design make a positive contribution to the locality.</i>	The proposed development uses a controlled palette of high-quality materials that are detailed within architecture drawings and in the Design Statement.
<i>The landscape design facilitates the use of the public spaces from the outset.</i>	A network of different types of open spaces are provided within the scheme that will provide a range of opportunities for future users.
<i>Design of the buildings and public space will facilitate easy and regular maintenance.</i>	This can be achieved and will be provided by the estate management company.
<i>Open car parking areas are considered as an integral element within the public realm design and are treated accordingly.</i>	Parking is at under croft level and is limited in favour of providing high quality landscaped open space.
<i>Care has been taken over the siting of flues, vents and bin stores.</i>	Bin stores are located discretely around the site. No other flues or vents are proposed.



QUALITY HOUSING FOR SUSTAINABLE COMMUNITIES: BEST PRACTICE GUIDELINES FOR SUSTAINABLE COMMUNITIES, 2007

The Department’s policy statement Delivering Homes, Sustaining Communities, Guidance provides the overarching policy framework for an integrated approach to housing and planning. Sustainable neighbourhoods are areas where an efficient use of land, high quality design, and effective integration in the provision of physical and social infrastructure combine to create places people want to live in. The policy

statement is accompanied by Best Practice Guidelines that promotes quality sustainable residential development in urban areas having regard to the following:

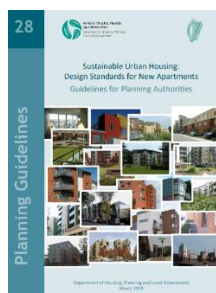
- *promote high standards in the design and construction and in the provision of residential amenity and services in new housing schemes.*
- *encourage best use of building land and optimal of services and infrastructure in the provision of new housing.*
- *point the way to cost effective options for housing design that go beyond minimum codes and standards.*
- *promote higher standards of environmental performance and durability in housing construction.*
- *seek to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and*
- *provide homes and communities that may be easily managed and maintained.*

The following criteria indicate the 7 no. essential requirements new residential developments should have regard to when carrying out development:

	EVALUATION OF CONSISTENCY
<p><u>Socially & Environmentally Appropriate</u></p> <p><i>“The type of accommodation, support services and amenities provided should be appropriate to the needs of the people to be accommodated. The mix of dwelling type, size and tenure should support sound social, environmental and economic sustainability policy objectives for the area and promote the development of appropriately integrated play and recreation spaces.”</i></p>	<p>The scheme will provide a variety mix of units from 1, 2- and 3-bedroom apartments. This will cater to the needs of a wide range of family sizes and types. The proposal seeks to integrate usable open spaces distributed throughout a number of character areas. All communal open spaces will be overlooked by adjoining dwellings.</p>
<p><u>Architecturally Appropriate</u></p> <p><i>“The scheme should provide a pleasant living environment, which is aesthetically pleasing and human in scale. The scheme design solution should understand and respond appropriately to its context so that the development will enhance the neighbourhood and respect its cultural heritage.”</i></p>	<p>The design and layout of the scheme creates a liveable and visually pleasing residential environment.</p> <p>The design is mindful of the site context and is respectful to the architectural character of the adjoining areas.</p>
<p><u>Accessible & Adaptable</u></p> <p><i>“There should be ease of access and circulation for all residents, including people with impaired mobility, enabling them to move as freely as possible within and through the development, to gain access to buildings and to use the services and amenities provided. Dwellings should be capable of adaptation to meet changing needs of residents during the course of their lifetime.”</i></p>	<p>The design approach routes, entrances and accommodation within the proposed units incorporate the provisions of Building Regulations Part M access and use 2010.</p>
<p><u>Safe, Secure & Healthy</u></p> <p><i>“The scheme should be a safe and healthy place in which to live. It should be possible for pedestrians and cyclists to move within and through the area with reasonable ease and in safety. Provision for vehicular circulation, including access for service vehicles, should not compromise these objectives.”</i></p>	<p>The scheme provides good segregation of vehicle and pedestrians/cyclists.</p> <p>A very safe walking and cycling environment will be provided for residents and those travelling through the scheme from other development to get to the LUAs and buses or cycle paths.</p> <p>The interconnectivity of the scheme will ensure access for all while creating a walkable environment for inhabitants of the scheme. The continuity of path networks will assist natural way-finding in the scheme. Public open space shall be overlooked as</p>

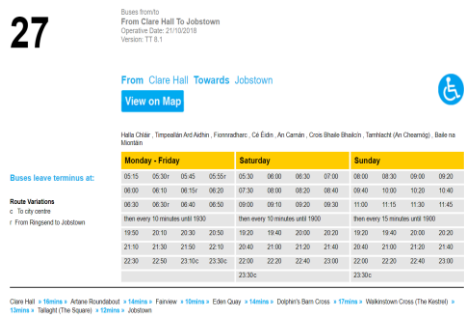
	far as practicable to achieve maximum passive surveillance
<p><u>Affordable</u></p> <p><i>“The scheme should be capable of being built, managed and maintained at reasonable cost, having regard to the nature of the development.”</i></p>	<p>The scheme will have high quality materials and landscaping throughout, ensuring that it has longevity in terms of appearance and ease of maintenance.</p>
<p><u>Durable</u></p> <p><i>“The best available construction techniques should be used, and key elements of construction should have a service life in the order of sixty years without the need for abnormal repair or replacement works.</i></p>	<p>The scheme proposes to use the best available materials and construction techniques in order to minimise the level of refurbishment over the lifetime of the scheme.</p>
<p><u>Resource Efficient</u></p> <p><i>“Efficient use should be made of land, infrastructure and energy. The location should be convenient to transport, services and amenities. Design and orientation of dwellings should take account of site topography so as to control negative wind effects and minimise the benefits of sunlight, daylight and solar gain; optimum use should be made of renewable sources of energy, the use of scarce natural resources in the construction, maintenance and management of the dwellings should be minimised.”</i></p>	<p>The scheme is considered to accord with the sustainable development principles.</p>

SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS, 2018



The Apartment Guidelines 2018 promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term. The guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.

GUIDANCE	EVALUATION OF CONSISTENCY
<p><i>The apartment guidelines (SPPR1) note that apartments may include up to 50% one bedroom or studio type units and that there shall be no minimum requirement for 3 or more bed units.</i></p>	<p>The proposed mixed-use residential scheme will provide for 197 no. 1 bed units (39%), 257 no. 2 bed units (51%) and 48 no. of 3 bed units (10%) is therefore is compliant with the stated housing mix in the Guidelines.</p>
<p><i>The apartment guidelines (SPPR3) set out the minimum floor areas for apartment units along with a requirement that the majority of units within a scheme shall exceed the minimum floor areas by 10%.</i></p>	<p>The HQA (Housing Quality Assessment) prepared by Ferreira Architects illustrates in tabular format how each apartment within the 6 no. blocks meet or exceed the relevant standards in respect to apartment size.</p>
<p><i>While SPPR4 requires more than 50% dual aspect apartments in suburban and intermediate locations. A minimum of 33% of dual aspect units are required in more central and accessible urban locations.</i></p>	<p>The proposed layout for the scheme ensures that 43.8% of the apartment units in the scheme are dual aspect, which exceeds the apartment guidelines-SPPR4 for accessible urban locations. Floor and roof plans submitted by Ferreira Architects as part of this planning application demonstrates compliance with the applicable standards.</p>
<p><i>The apartment guidelines states that all apartments should include private and communal open space.</i></p>	<p>Each of the proposed units will contain private terraces and balconies open space in excess of the requirements. The quantum of private open space is set out in the HQA prepared by Ferreira Architects. C. 6747sqm (27% of the Net Site Area) is provided as surface level Public Open space. Communal open spaces (c. 4372sqm) are provided within the scheme which will add to the amenity of the residents. The amount of Open space provided within the scheme exceeds the requirements set out in the Apartment Guidelines c.3,216sqm (Calculated as per 5 sq. m for a 1 bed unit, 7 sq.m for a 2 bed unit and 9 sq.m for a 3 bed unit)</p> <p>This high quality, car free landscaped open space will provide for a range of opportunities for the future</p>

	<p>residents of all age groups. It is considered that the location of the public open spaces allows for free movement within the site and to the surrounding lands which increases permeability and connectivity through the site.</p>
<p><i>All ground floor apartments are required to have 2.7m high floor to ceiling heights.</i></p>	<p>All the ground floor apartments have greater than the minimum requirement of 2.7m floor to ceiling heights in line with SPPR5.</p>
<p><i>SPPR6 limits the number of units per core.</i></p>	<p>The proposal is also in line with SPPR6 regarding the number of units per core. A maximum of 11 units share a single core.</p>
<p>Section 4.16 identifies that cycling “provides a flexible, efficient and attractive transport option for urban living and these guidelines require that this transport mode is fully integrated into the design and operation of all new apartment development schemes.”</p>	<p>In line with this guideline the scheme provides 584 secure and accessible cycle parking spaces at undercroft level and Ground level. Bike parking spaces are provided at the rate of 1 per unit and additional bike parking spaces at the proposed retail outlets. These are above the National and Local Policy requirements.</p>
<p>Appropriate density</p>	<p>The proposed density on the subject site is 202 no. units per hectare. It is considered that the proposed density is appropriate given National Policy objective to increase residential density in existing central-urban locations.</p>
<p>Appropriate location</p> <p>A key inclusion in the guidelines is the acknowledgement of the importance of strategic sites in existing urban areas in close proximity to existing public transport facilities. The guidelines identify locations in cities and town that may be suitable for higher density apartment development as follows:</p> <ul style="list-style-type: none"> •Central and/ or Assessible Urban Locations •Intermediate Urban Locations •Peripheral and/ or Less Accessible Urban Locations 	<p>The subject site is considered an “Accessible Urban Location” given it is located directly adjoining a high frequency urban bus service – the Dublin Bus 27 services which operates from Jobstown to Clare Hall via Dublin City Centre which operates every 10 minutes Monday to Saturday during the day, and every 15 mins on Sundays.</p>  <p>This service will be further improved with the delivery of Bus Connects.</p>

DESIGN MANUAL FOR URBAN ROADS & STREETS (DMURS), 2019

The Design Manual for Urban Roads and Streets (DMURS), was first published in 2013 and has since been updated in May 2019. This document sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

EVALUATION OF CONSISTENCY

The adopted design approach successfully achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. The proposed scheme prioritises pedestrians and cyclists through the development using shared surfaces. Cars are parked in the undercroft/ basement area of blocks A,B,C and E,F which are accessed directly off the main roads. This results in no private vehicles entering into the site.

The scheme also has reduced parking for private cars and ten car club spaces in order to promote a modal shift to alternative forms of transport while creating high quality public open space for the residents.

Permeability for cyclists and pedestrians is prioritised in this scheme through landscaped pathways linking into open space and through the scheme into the wider area. 584 number of bicycle spaces are provided in the scheme, which is at the rate of one per unit, plus over 74 visitor spaces. The site will have good accessibility with existing and proposed public transport corridors such as: LUAS, Bus Connects, and high frequency bus routes. Additional information can be found within the Transport Assessment and the Mobility Management Plan prepared by Barrett Mahony Consulting Engineers submitted with this application.

GUIDELINES FOR PLANNING AUTHORITIES ON CHILDCARE FACILITIES, 2001



These guidelines state that Development Plans should facilitate the provision of childcare facilities in larger new housing estates with the standard minimum provision of one childcare facility with 20 places for each 75 dwellings.

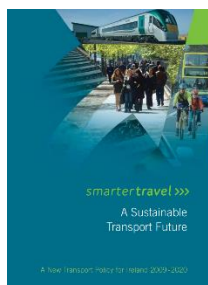
Section 4.7 of the *Sustainable Urban Housing Design Guidelines for New Apartments*, 2018 states the following:

*“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. **One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.**”*

EVALUATION OF CONSISTENCY

The scheme includes proposals for a creche unit that will provide for 44 spaces. The proposed development is for 502 residential apartments, 454 no. of which are 2 or one bedroom and only 48 no. 3 bed units. It is considered that this proposal will generate a very low childcare. As a result, this proposed creche will be able to accommodate the childcare demand arising from this proposed development.

SMARTER TRAVEL – A SUSTAINABLE TRANSPORT FUTURE: A NEW TRANSPORT POLICY FOR IRELAND 2009-2020



Key targets of this national sustainable transport policy include:

- To support sustainable travel, future population and employment growth will have to predominantly take place in sustainable compact urban areas or rural areas, which discourage dispersed development and long commuting
- Work-related commuting by car will be reduced from a current modal share of 65% to 45%, which will mean that between 500,000 and 600,000 commuters will be encouraged to take means of transport other than car driver (of these 200,000 would be existing car drivers). Change in personal behaviour will also be necessary for other travel purposes as most travel relates to non-commuting.
- Car drivers will be accommodated on other modes such as walking, cycling, public transport and car sharing (to the extent that commuting by these modes will rise to 55% by 2020) or through other measures such as e-working.
- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current total car kilometres.

EVALUATION OF CONSISTENCY

The proposed development is in line with the overall vision for better integration between land-use and transport. The proposed scheme places a high density residential scheme along a high frequency public transport corridor. Thereby, encouraging the residents of the scheme to use alternate means of transportation by disincentivising private car usage. Further details can be found within the Mobility Management plan prepared by Barrett Mahony Consulting Engineers that has been submitted along with the application.

GUIDELINES FOR PLANNING AUTHORITIES ON THE PLANNING SYSTEM AND FLOOD RISK MANAGEMENT, 2009

These guidelines require the planning system to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.

The Guidelines adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate

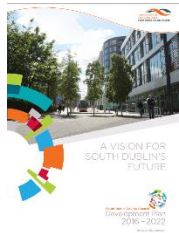
flood risk assessment into the process of making decisions on planning applications and planning appeals.

EVALUATION OF CONSISTENCY

A site specific flood risk assessment has been carried out for the site in accordance with OPW publication '*The Planning System and Flood Risk Assessment Guidelines for Planning Authorities*' by Barrett Mahony Consulting Engineers and submitted with the application within the Civil Engineering Infrastructure Report. It is noted within the assessment that there are no flooding risks affecting the site from fluvial sources. Any flood events are unlikely to cause flooding of the proposed scheme and the development does not affect the flood storage volume of the vicinity or create flood risk elsewhere.

4. LOCAL PLANNING POLICY

SOUTH DUBLIN COUNTY COUNCIL DEVELOPMENT PLAN 2016-22



The core strategy for SDCC Development Plan 2016 has identified Tallaght area as a Metropolitan Consolidation Town. Core Strategy Policy 2 for Metropolitan Consolidation towns says that *“it is a policy of the Council to support the sustainable long-term growth of Metropolitan Consolidation Towns through consolidation and urban expansion”*. CS2 Objective 5 says that it is an objective *“to promote and support good quality infill development in existing built up areas.”*

The Development Plan has identified 58 Ha of new regeneration lands that has the potential to be developed into residential areas. The core strategy is focused on the residential development to ensure that the development is at an equilibrium with the associated services, infrastructure and residential demand for the area. Core strategy CS2 Objective 4 of the plan states that *‘it is an objective of the council to promote and support the regeneration of underutilised industrial areas designated with Zoning Objective Regeneration ‘REGEN’*. The proposed site is zoned as REGEN lands which *‘support and facilitate the regeneration of underutilised industrial lands that are proximate to town centres and public transport nodes for more intensive enterprise and residential led development’*.

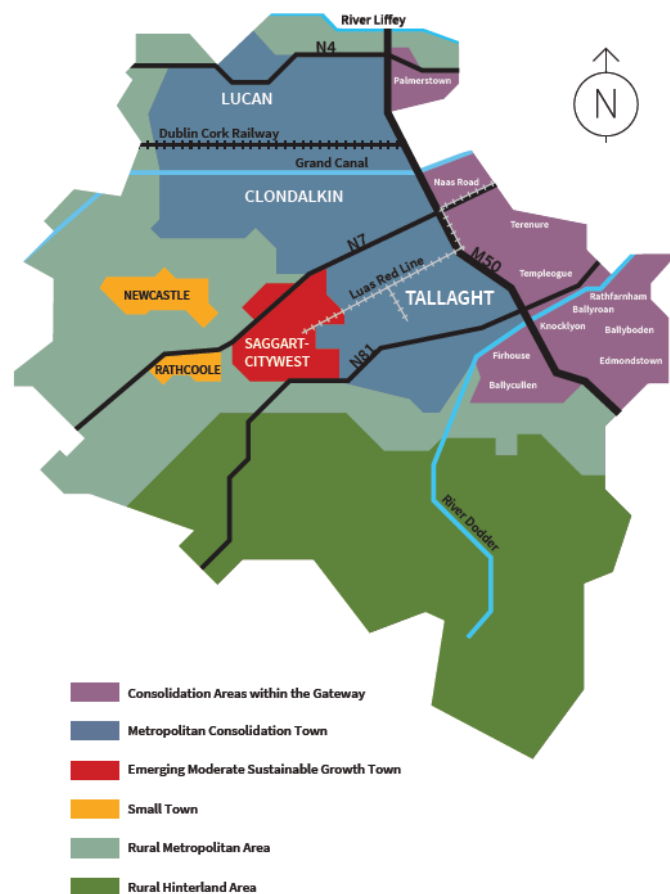


Figure 5: Core Strategy map for South Dublin County Council 2016-22

It is also a policy of the council that *all new development must integrate Green Infrastructure network*. (According to G2 objective 5). A green link is suggested between the Tymon park and Bancroft park as part of SDCC Green Infrastructure Network.

Land Use and Zoning:

Figure 5 details the land-use zoning designation of the subject site as prescribed by the South Dublin County Council (SDCC) Development Plan 2016–2022 (SDCCDP). The site is zoned as ‘Regeneration – ‘REGEN’ – with an objective “to facilitate enterprise and/or residential-led regeneration

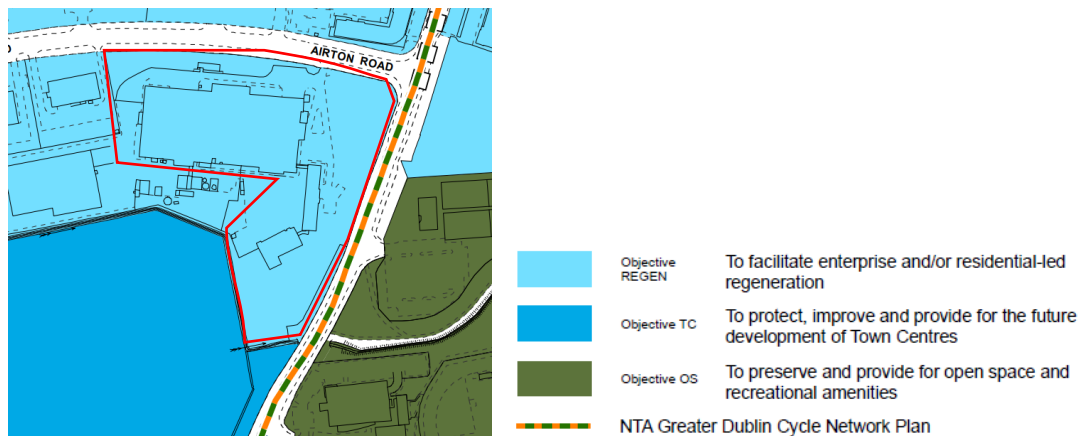


Figure 6: Zoning for the site

REGEN zoning has a broad scope and has a wide range of permitted and open for consideration land uses which include below:

Permitted in Principle

Advertisements and Advertising Structures, **Childcare Facilities**, Community Centre, Education, Enterprise Centre, Health Centre, Home Based Economic Activities, Hotel/Hostel, Housing for Older People, Industry-Light, Live-Work Units, Motor Sales Outlet, Office-Based Industry, Office less than 100 sq.m, Offices 100 sq.m –1,000 sq.m, Offices over 1,000 sq.m, Open Space, Petrol Station, Public Services, Recreational Facility, **Residential**, **Restaurant/Café**, Residential Institution, Science and Technology Based Enterprise, **Shop-Local**, Sports Club/Facility, Stadium, Traveller Accommodation.

EVALUATION OF CONSISTENCY

This proposed development is wholly compliant with the zoning for the site

Section 11.2.1 sets the criteria for Design Statement accompanying development proposals in Regeneration (REGEN) zones. These are addressed below:

	EVALUATION OF CONSISTENCY
<i>Demonstrate a clear transition towards a more urban form of development and a traditional street network.</i>	<p>The proposed layout for the scheme presents a strong urban edge along Airton road and Greenhills road. The proposed development steps up in height from 4 to 8 storeys towards the Airton / Greenhills road junction.</p> <p>The proposed height for this is site is appropriate considering the location of the site with respect to high frequency bus corridor adjoining as well as with respect to the site context with neighbouring HSE building having a height of 5 storeys. The generous width of the roads also</p>

	invites higher scaled development along the roads in order to provide a sense of enclosure.
<i>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 other residences.</i>	<p>The site is well connected to the region. It is a corner site located between two major roads- Airton road and Greenhills road. It has easy access to bus facilities and the Luas. It is also close to the M50 and the wider road network.</p> <p>Local shops, sports and education facilities are available within walking distance of the site and it is also close to The Square, Tallaght Village, Tallaght IT, local employment and Tallaght Hospital. Bancroft park, and Astro park Tallaght are located adjacent to the site. The proposal also includes provisions for retail outlets, public open space, other community services such as Gyms and Childcare which will become an amenity for the area.</p> <p>The site also allows for more permeability throughout the site for pedestrians and cyclists, connecting into the wider green network surrounding the site.</p> <p>This site, as indicated by the masterplan, is phase 1 of a two phase development, with the remainder of the site coming forward in the future.</p>
<i>Residential development should not be introduced at ground floor level adjacent to busy roads, and/or roads that are subject to significant movements by Heavy Goods Vehicles (HGVs).</i>	The development is set back from the public roads which the appropriate landscaping to the area will ensure that the amenities of residential units at ground floor level will be protected while also providing activity to this area.
<i>Given the transitional nature of Regeneration zones, precautions will be taken to ensure that the potential for noise pollution, air pollution or other nuisance from established industrial uses will not exceed acceptable environmental standards. The Planning Authority may seek a report from a suitably qualified person to identify and quantify sources of noise pollution, air pollution, or nuisance, assess the potential impacts on the proposed development and provide a series of recommendations to mitigate the impacts of any pollutants insofar as possible (e.g. orientation and layout of dwellings, positioning of openings and insulation).</i>	Care has been taken so that the development works during or after the construction phase will be within the acceptable environmental standards. A noise and air analysis have been conducted by Traynor’s Environmental Consulting within the EIAR detailing the possible noise and air pollution sources from the proposed development and necessary mitigation measures.
<i>It may be necessary to consider improvements to the surrounding road and street network in</i>	A Traffic Assessment prepared by Barrett Mahony Consulting Engineers has listed out any

<i>conjunction with the Planning Authority, to calm traffic and improve pedestrian and cyclist access.</i>	possible impacts that the proposed development will have on the transportation network and how they can be mitigated.
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Policy H1 Objective 2 regarding **Part V** contributions require: ‘ 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended) to all sites that are zoned solely for residential use, or for a mixture of residential and other uses.’

SDCC HOUSING (H) Policy 8 Residential Densities states “It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context”. It requires ‘density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009)’. Residential developments close to Town, District and Local Centres and high capacity transport corridors are encouraged to consider higher densities. ‘To support proposals for more intensive enterprise and/or residential led development within areas designated with Zoning Objective ‘REGEN’”

Policy H7 **Urban Design in Residential Developments** Objective 1 recommends: ‘that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).’

Regarding **Housing type, size and mix** Objective 1 of Policy H10 asks ‘to ensure that new residential developments provide for a **wide variety of housing types, sizes and tenures** in line with the Interim South Dublin County Council Housing Strategy 2016-2022.’

EVALUATION OF CONSISTENCY

The subject lands are allocated and zoned for REGEN to facilitate enterprise and/or residential led development. The proposed development is in line with the zoning and seek permission to build 502 residential units along with associated communal facilities, a creche and three retail outlets on a former factory site that has remained vacant since 2003.

The development will provide a high density apartment development on a site that is adjacent high quality public transport and proximate to a range of social infrastructure, education and employment opportunities. The proposed scheme includes 197 no 1 bed units, 257 no 2 bed unit types and 48 no. of 3 bed unit types, which will significantly improve the quantum and mix in the area.

A design statement for the proposed development has been submitted with the application. 10% Part V units are proposed. The details of which has been submitted with the application.

Regarding **Residential Building Heights** Policy H9 of the SDCC Development Plan (2016-22) supports varied building heights for developments within regeneration zones subject to the amenity of the area. It is an objective of the Development Plan (H9 Objective 4): “To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centres, Mixed Use zones and Strategic Development Zones and subject to an approved Local Area Plan or Planning Scheme”.

Objective 1 of H9 recommends: ‘To ensure that higher buildings in established areas respect the surrounding context.’ Buildings that are proposed to be taller than the prevailing building height of the area should be supported by a strong urban design rationale. According to section 11.2.7 the appropriate maximum or minimum height of any building will be determined by:

- *The prevailing building height in the surrounding area.*
- *The proximity of existing housing - new residential development that adjoins existing one and/or two storey housing (backs or sides onto or faces) shall be no more than two storeys in height, unless a separation distance of 35 metres or greater is achieved.*
- *The formation of a cohesive streetscape pattern – including height and scale of the proposed development in relation to width of the street, or area of open space.*
- *The proximity of any Protected Structures, Architectural Conservation Areas and/or other sensitive development.*

Where proposed height is greater than the neighbouring buildings it is suggested that a transition is provided.

EVALUATION OF CONSISTENCY

The proposed development is for an appropriate height of 4-8 storeys stepping up in height towards the Airton road junction with Greenhills road providing a strong urban edge and focal point for the development.

The site context consists of existing non-residential development buildings ranging from 3-5 storeys in height. The proposed design takes into account the fact that this area as a regeneration area is in flux with recent permissions granted within the REGEN area for 9 storey buildings, and a second 9 storey building currently under consideration by ABP for another 9 storey building at the opposite end of Airton Road. This transition from a predominantly industrial area to a mixed use area will result in an altered urban character and scale. This proposed development is in keeping with the recently permitted and proposed developments and the REGEN zoning for the area.

It is also noted that this is a corner site fronting onto Airton road and Greenhills road R819 which are main arterial roads with high frequency bus services and this corner site forms a strategic location for high density development. The additional height at this corner will provide further legibility and way finding in this area.

The site is within reasonable distance of Belgard and Tallaght Square LUAS stops. The site is also next to major employment centres Tallaght University Hospital, Broomhill Industrial Estate, Hibernian Industrial estate and major third level education centre Tallaght Technological University. The proximity of the site to these high frequency transport corridors and large employment centres makes the site an appropriate location to put in high density development.

Policy H11 on **Residential Design and Layout** specifies that ‘new residential developments taking account of energy efficiency, prioritising passive house construction standards, as well as renewable energy opportunities, including solar energy where appropriate, in accordance with Part L of the Building Regulations.’

On **Public Open Space** Policy H12 asks to ensure that a clear definition be included in between public, private and semi-private open spaces and ‘that all such open spaces benefit from passive surveillance from nearby residential development.’

Policy H13 on **Private and Semi-Private Open Space** asks to ‘ensure that new apartments have access to high quality and integrated semi-private open space that supports a range of active and passive

uses.' It is the policy of the Council that a hierarchical network of high-quality open space is available to those who live, work and visit the County, providing for both passive and active recreation, and that the resource offered by public open spaces, parks and playing fields is maximised through effective management. According to C12 Objective 4: it is the objective of the council 'to support and facilitate the development of indoor and outdoor recreational facilities and play spaces in larger parks to cater for all age groups and abilities.' The Planning Authority requires public open spaces to be provided as an integral part of the design in every residential development. A minimum of 10% of the total site area should be dedicated as public open space. (According to Section 11.3.1 of SDCC Development Plan 2016) As part of the council's Five-year play space programme 2014-18 it plans to deliver more than 60 play spaces throughout the County. A detailed Landscape Plan that outlines the extent of open space and details for its treatment will be required with residential developments of 10 units and above.

Regarding **Internal Residential Accommodation** Policy H14 states that To ensure that all residential units and residential buildings are designed in accordance with the relevant quantitative standards, qualitative standards and recommendations contained in Sustainable Urban Housing: Design Standards for New Apartments (2015), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the companion Urban Design Manual and have regard to the standards and targets contained in Quality Housing for Sustainable Communities (2007), particularly the standards and recommendations that relate to internal amenity/layout, overall unit size, internal room sizes, room dimensions, aspect, sound insulation, communal facilities, storage, sustainability and energy efficiency.

On **Privacy and Security** Policy H15 asks to ensure that 'all developments are designed to provide street frontage and to maximise surveillance of streets and spaces.' Regarding balconies and windows that 'To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity.' A separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy. Reduced distances will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy.

Policy C13 – Accessibility

It is the policy of the Council to promote the highest levels of universal accessibility in all community facilities.

Regarding **Access core and communal space** (as per Section 11.3.1.vii) it is advised that apartment schemes minimise the use of shared entrances and favour own door access at street level. Access lobbies are advised to be kept to a minimum. External staircases are also recommended to be avoided as they could dominate the streetscape.

EVALUATION OF CONSISTENCY

The proposed development has provisions for 6747 sq.m (27% of site area) of public open space that is provided throughout the development including as a plaza at the Airton road/ Greenhills road junction and an open space towards the Southern corner of the site to protect the riparian corridor of Tymon/Poddle river. In addition to this communal open space are provided in between blocks at first floor levels.

The proposed layout ensures that all open spaces will maximise surveillance from the residential units. Open spaces have been designed to meet the requirements of all age groups and includes

provisions for active and passive uses. Active uses provided within the scheme include: Basketball court, picnic tables, kick about spaces and a children's play area.

Adequate separation distance has been provided for balconies and terraces so as to provide optimum privacy and security for future residents of the scheme. Accessibility for all has been ensured in the layout and landscaping at ground level. All access corridors will also include provisions for lifts. Private open spaces and other facilities have been provided in excess of the requirement of the council. This can be seen in detail in the Housing Quality Assessment submitted with the application.

Private open space for apartments shall be provided in the form of terraces/balconies/roof gardens, which form an integral part of the scheme design. These meet the Apartment Guidelines 2018 standards.

The proposal is designed to ensure energy efficiency in line with Part L of the building regulations.

On **Childcare Facilities** once a planning application exceeds 75 units there is a requirement, in line with national guidance. In new developments, childcare facilities should be purpose built, at ground floor level or as a stand-alone building. As per Policy C8 – It is the policy of the Council to require the provision of new childcare facilities in tandem with the delivery of new communities.

Regarding **Greenways, Trails and Loops** Policy ET6 states that it is the policy of the Council to support and facilitate the development of an integrated network of Greenways and Trails (combined off road cycle and walking routes) along suitable corridors, including natural linear open spaces such as river banks and canals, with local connections to villages and attractions and to take account of the environmental sensitivities along these corridors. Provisions has been included within the proposed scheme for any future development of the river side walkway along Tymon/Poddle river that runs along the southern boundary of the site.

Policy R1 Recommends the provision of local convenience shops where there is a deficiency of retail provision. To encourage and facilitate the provision of local convenience shops (Shop – Local) in existing residential areas where there is a deficiency of retail provision in the catchment, subject to protecting resident amenity.

Chapter 5 of SDCC development Plan 2016 on **Urban Centres and Retail** detail out settlement hierarchy and Retail Hierarchy for South Dublin. Settlement hierarchy for SDCC Development Plan 2016-22 sets out Tallaght as Metropolitan Consolidation Town of Level 2 in the Retail Hierarchy, Corner shops that serves as Local shops has been designated Level 5 in the retail hierarchy. Retail criteria outlined in section 11.3.6 states that new retail developments shall accord with the following requirements:

- Retail development should be in accordance with the role and function of the retail centre and accord with the scale and type of retailing identified for that location.
- Retail development should be in accordance with the fundamental objective to support the vitality and viability of the retail centre and must demonstrate compliance with the sequential approach. Proposals to amalgamate retail units will be carefully considered.

Policy TM3 on connectivity for pedestrians and cyclists to be maximised in new communities and improved within existing areas in order to maximise access to local shops, schools, public transport services and other amenities, while seeking to minimise opportunities for anti-social behaviour and

respecting the wishes of local communities. The Tallaght to Walkinstown via Greenhills and Crumlin (linking to Dublin City Centre) cycle path has been included in the 6-year cycle network program (Table 6.4).

EVALUATION OF CONSISTENCY

The proposed development is providing a creche for 44 children within the development. This is considered sufficient to accommodate any children generated by the development.

The proposed development also includes within both the site the subject of this application and the overall masterplan the continuation of the walk beside the Tymon/Poddle River and pedestrian links to the Bancroft Park to the south of the development site. This is in addition to the new pedestrian link through the centre of the development along with new public open spaces.

The proposal is also for three new retail shops along Airton Road and Greenhills Road in order to provide activity to this area of the development and also provide additional facilities within the development. These proposed small shops are considered to be of a scale appropriate to the location and the development and the existing infrastructure in the wider area.

The site is served by Retail Hierarchy Level 2 ,3 and 4 zones, however, as set out in the Future Analytics report there is a shortage of some of the local/ neighbourhood service needs. To address this and in line with the zoning for the site, 3 retail units, a gym and a creche are proposed. This will increase the facilities at a local level while also providing active uses at street level and improve the vitality of the area. The proposed retail units are of a site which are commercially viable.

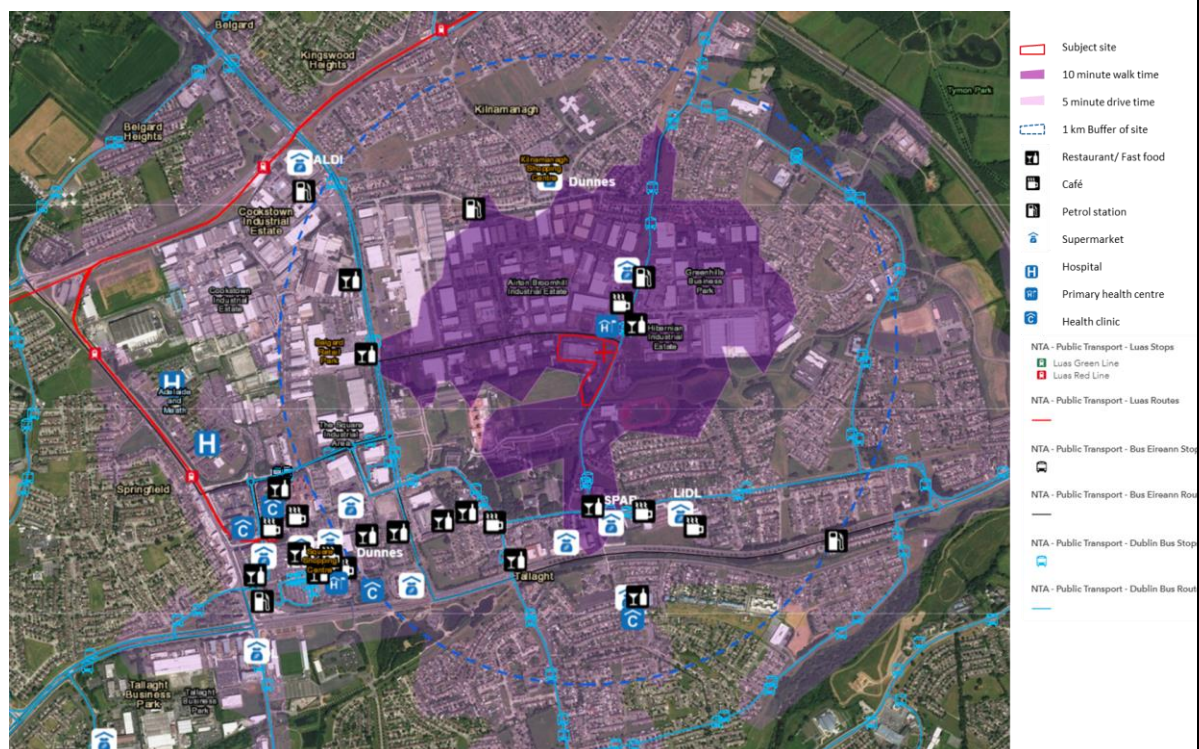


Figure 1 Map locating existing retail and health services in the site locality

As all the car parking is located in undercroft or basement areas the proposals is dominated by pedestrian and cycle links through the site and into the wider area. In addition to these routes within the site, there are also improvements proposed in pedestrian crossings to the east and north of the site. These links increase the permeability of the area.

Regarding **Car Parking** Policy TM7 asks that the proximity of the site to public transport to be given due consideration in the design statement. Developments are asked to be supported by a Mobility management plan whenever possible that discusses plans for discouraging the use of single occupant car-based journeys for future residents of the scheme. Surrounding road network should be capable to meet the increase in traffic due to the development.

Policy TM7 Objective 1 states that ‘to carefully consider the number of parking spaces provided to service the needs of new development.’

Table 11.24 of the Development Plan discusses the maximum provision of car parking spaces in apartment developments (extract of which is given below). SDCC development plan 2016 encourages lower car parking rates, subject to the proximity of the site with public transport and quality of the transport services.

DWELLING TYPE	NO. OF BEDROOMS	ZONE 1	ZONE 2
Apartment	1 Bed	1 space	0.75 space
Duplex	2 bed	1.25 space	1 space
	3 bed+	1.5 spaces	1.25 space

Table 1 Maximum car parking provisions Zone 2 -Residential

Section 11.4.4 has specified that for large residential development of more than 50 units will be required to have off-street parking that can be designed as Parking courts, Basement or Multi storey Car parks.

Bike parking standards

Table 11.22 of the development plan sets out requirements for bicycle parking in the County. They are divided into Long term and short stay. For residential apartment buildings 1 space should be provided for 5 units as long term lockers in a secure area that is not freely accessible to the public. 1 space should be provided for 10 units as short stay that are located in highly visible areas that are easily accessible.

EVALUATION OF CONSISTENCY

The proposed development has provisions for 202 car parking spaces all located within the undercroft level of blocks A, B and C and at basement level of blocks E and F. This figure includes 10 club car spaces for communal use. This is at the rate of 0.40 spaces per number of units. This is considered appropriate considering the how well connected the site is to public transport corridors, located beside a high frequency bus corridor (Dublin Bus route 27 at every 10 mins, Routes 76 and 54a at every 20 mins) and within 15 minutes’ walk of the luas stops at Belgard and Tallaght square LUAS stations. The sustainable nature of the site, along with the provision of car club facilities enables the residents to be less dependent on the private car.

584 bike parking spaces are provided which equates to more than one space per occupant. Please refer to Mobility Management Plan and Traffic & Transport Statement for the development prepared by Barrett Mahony Consulting Engineers submitted with the application.

Cycle paths and pedestrian foot paths have been provided around the proposed blocks and several access points has been provided along Airton and Greenhills road to increase the permeability into the site.

The proposed scheme includes provisions for 3 retail units and a creche that will benefit the existing and future residents of the locality.

Policy IE2 on **Surface Water runoff** asks 'to limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SUDS) and avoid the use of underground attenuation and storage tanks. Policy G5 promotes the provision of **Green Roofs** and/or Living Walls in developments where expansive roofs are proposed such as industrial, retail and civic developments.

Policy IE3 regarding **flood risk management** development proposals to be assessed as per the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009) and Circular PL02/2014 (August 2014).

On **Waste Management** IE5 Objective 8 states that 'secure appropriate provision for the sustainable management of waste within developments, including the provision of facilities for the storage, separation and collection of such waste.'

Policy IE7 on **Air Pollution** requires all developments to have regard and to implement 'the recommendations of the Dublin Regional Air Quality Management Plan to protect people from the harmful health effects associated with **air pollution**, to preserve good air quality where it exists and to improve air quality where it is unsatisfactory.'

Policy IE7 on **Noise disturbances** recommends implementation of relevant spatial planning recommendations and actions of the Dublin Agglomeration Environmental Noise Action Plan 2013 – 2018. Also, to ensure that future developments are designed and constructed to **minimise noise disturbance** and take into account the multi-functional uses of streets including movement and recreation as detailed in the Urban Design Manual (2009) and the Design Manual for Urban Roads and Streets (2013).

Policy IE7 on **Lighting schemes** asks developments to **ensure external lighting schemes** minimise light spillage or pollution in the immediate surrounding environment and do not adversely impact on residential or visual amenity and biodiversity in the surrounding areas. In particular Policy G4 recommends 'to minimise the environmental impact of external lighting at sensitive locations within the Green Infrastructure network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats.'

GREEN INFRASTRUCTURE (G) Policy 2 **Green Infrastructure Network** states that it is the policy of the Council to promote and develop a coherent, integrated and evolving Green Infrastructure network in South Dublin County that can connect to the regional network, secure and enhance biodiversity, provide readily accessible parks, open spaces and recreational facilities.

GREEN INFRASTRUCTURE (G) Policy 3 on **Watercourses Network** recommends existing watercourses to be protected and strengthened and to 'uncover existing culverts and restore the watercourse to acceptable ecological standards and for the passage of fish, where possible'.

EVALUATION OF CONSISTENCY

The proposed schemes have included SUDS as part of its landscaping works further details can be found in the landscape report and drawings prepared by Mitchell associates. The proposed scheme also includes provisions for extensive Green roofs within the scheme.

A Site-Specific Flood Risk Assessment has been conducted for the site by Barrett Mahony Consulting Engineers. This report is included within the Civil Infrastructure Report in chapter 5.

Sheltered Bin store areas have been provided as per the minimum requirements for waste storage in developments for a weekly collection. Details of the same can be found within the Operational Waste Management Plan prepared by Traynor's Consulting Engineers.

An Air and Noise Pollution assessment has been conducted for the proposed works during and after construction works by Traynor's consulting Engineers.

A bat survey conducted for the site found that the site was used for feeding purposes by bats. All recommendations from the Bat survey has been incorporated in the design.

In accordance SDCC policy the majority of the existing trees on site has been retained and additional trees are proposed to be planted throughout the scheme to enhance the existing green links on the site. The proposed scheme also seeks to protect and improve the riparian corridor.

TALLAGHT TOWN CENTRE LAP 2006-12(Extended to 2016)

This LAP is no longer current and SDCC issued a Draft LAP in September 2019. It was advised by SDCC that the policies set out in the 2006 LAP are no longer compliant with the National guidelines.

The 2006 LAP proposed future land uses on this site to be commercial/lower intensity uses. This is in contradiction with the current development plan that has rezoned the area as REGEN zoning that caters for enterprise/residential led regeneration.

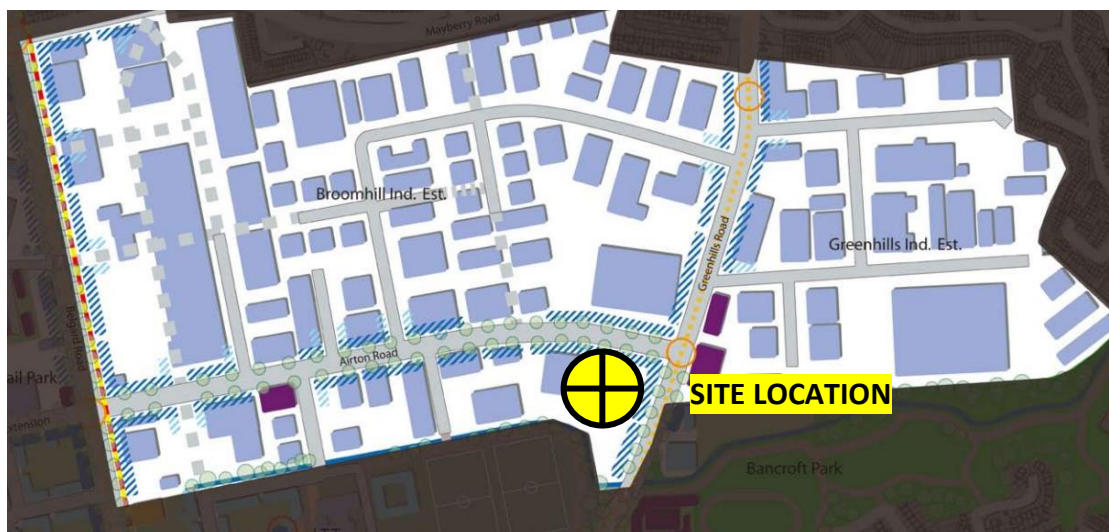


Figure 2 Tallaght Town centre LAP recommendations for future built form and landscape

It had identified the Airton/Greenhills road junction as a Gateway to Airton precinct area and the Airton and Greenhills road street frontages were identified as key frontages for a strong urban edge with minimal setbacks.

EVALUATION OF CONSISTENCY

The proposed development complies with the broad-brush policies set out in the 2006 LAP in terms of providing a taller building on the junction of Airton/ Greenhills Road and also a strong urban edge along the streets. However, in line with SDCC advice that the Development Plan REGEN zoning

policy overrides the proposed uses set in the 2006 LAP, the proposed uses are for mixed use commercial and residential.

It is also worth noting that on the Belgard Gardens SHD, ABP 303306-18 the inspectors opinion highlighted when assessing the application 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.”*

PROPOSED DRAFT TALLAGHT TOWN CENTRE LAP 2020-26

The Draft Tallaght Local Area Plan 2019 sets out the framework for the delivery of high-quality housing and well-connected neighbourhood areas within the Tallaght area. The Draft LAP covers an area of 270 hectares, and it is expected to deliver between 9,700 to 12,800 new homes: 4,700 to 12,800 new jobs and an additional population of 38,000 people.

The Draft Tallaght LAP includes detailed proposals for the urban structure and function for the Draft LAP lands. It is specified within the plan (Section 2.4.2) that mixed-use frontages identified in the Urban Function concept are required to have a mixed-use element and have a non-residential frontage at ground floor level, or some other acceptable alternative which performs the same function of providing activity at ground floor level. Minimum floor to ceiling heights of between 3.5 and 4 metres will be required to facilitate non-residential uses.

Intensity of development

Section 2.6 of the Draft LAP discusses the intensity of developments envisioned for the Plan lands and separates the area into 5 Neighbourhoods. The application site falls within the Broomhill Neighbourhood. This allocates a plot ratio of 0.75-1.0 but allows for flexibility in relation to the gross floor area of up to 20% of the plot ratio ranges where there is a strong design rationale for an increase in density/height and the development will result in a significant public gain.

A significant public gain includes:

- The dedication of part of the site for public open space including parks and plazas.
- The creation of streets and links that provide access through and access to a site.
- Major upgrades to streets surrounding the site including works such as street widening, new enhanced junctions and crossing points and realignments.
- Provision of community and/or cultural amenities that will significantly contribute to the social infrastructure in the area; and
- Other public domain works or improvements to be agreed with the Council.

For clarity, a significant public gain does not include minor public domain works (such as paving upgrades or the planting of street trees) or other works that are required by the various standards contained within this plan (such as high quality materials) or Guidelines. The plot ratio ranges and additional 20% floorspace bonus shall normally be calculated on the basis of the gross site area.

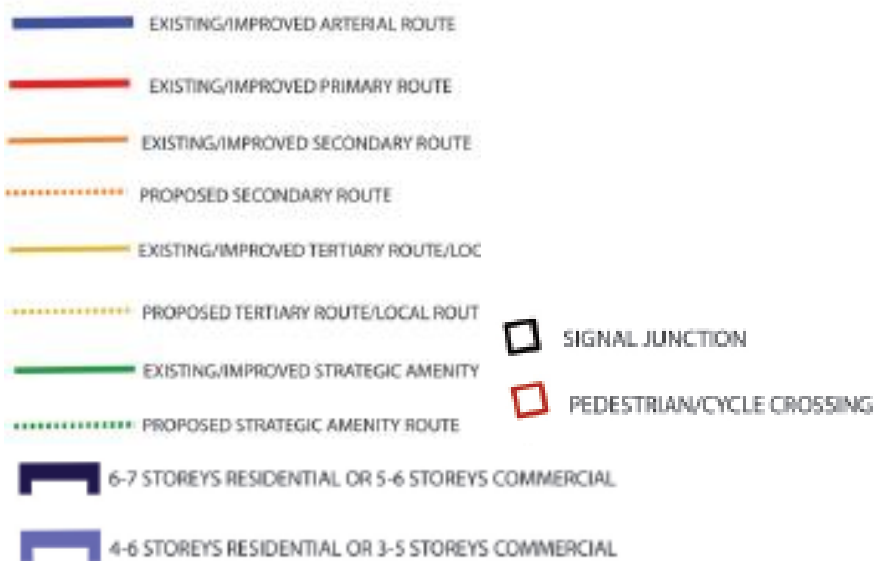


Figure 3 Overall Urban Structure (Figure 2.4 Draft Tallaght LAP 2020)

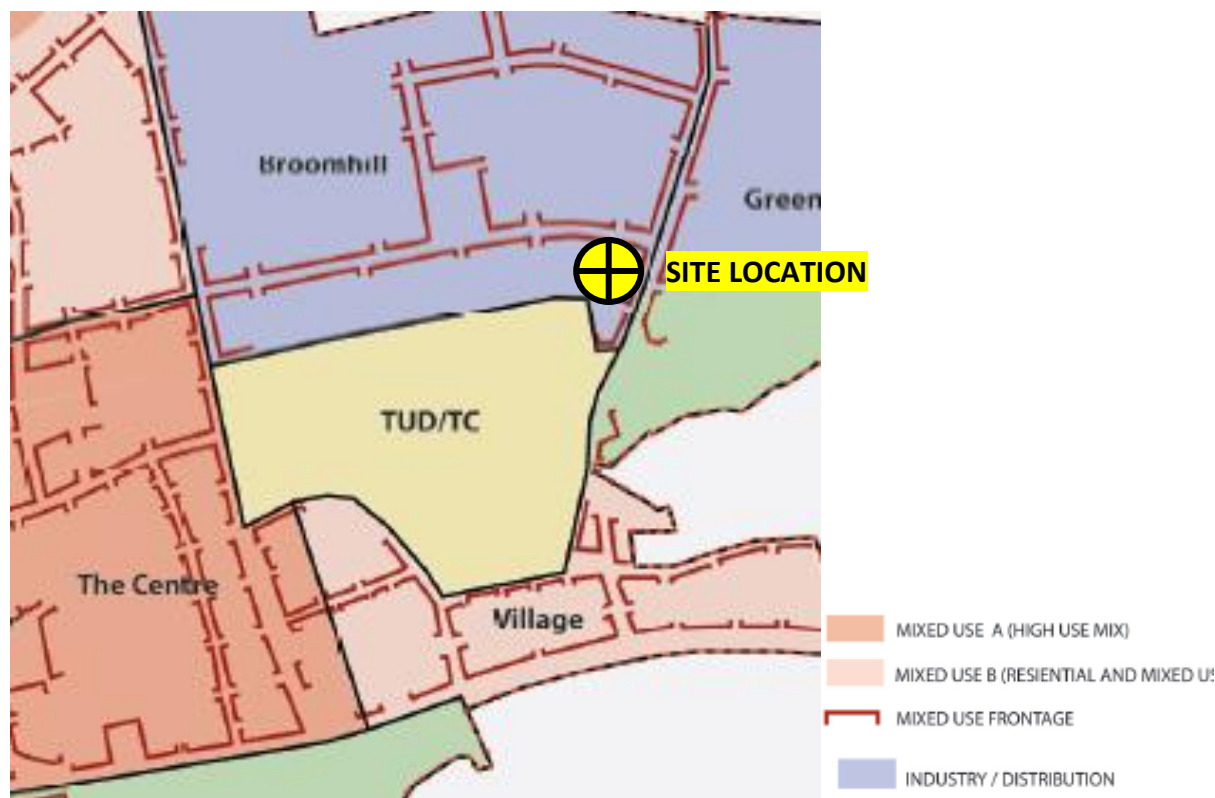


Figure 4 Urban Function (Figure 2.5 Draft Tallaght LAP 2020)

Section 2.6.2 of the Draft LAP discusses constraints regarding building height. Building height in conjunction with plot ratio is a key measurement to determine the intensity, scale and bulk of the development. Taller buildings are in general proposed in “The Centre”, in close proximity to Luas stops and along arterial and primary route frontages (6–7 storeys Residential, +1 recessed and 5–6 storeys non-residential, +1 recessed).

Active street frontages are encouraged along ground floor frontages by providing retail, community, employment and active residential with own door, windows etc.

Public Realm and Open Space

Applications on the plan lands are asked to demonstrate how the proposal will support delivery of the public realm and hierarchy of parks proposed within the Draft LAP. Section 2.7.1 Interaction with the Public Realm states that *it is policy of the Council that designers will be required to ensure successful interaction between the residential scheme, streets and public realm to foster a true sense of neighbourhood and encourage interaction between residents. Opportunities for animated ground floors, homes with own door access, private landscaped terraces and a successful integration with communal and public open space shall be encouraged. Along mixed frontage streets commercial, communal and other appropriate active uses at ground floor level shall be required.*

At a minimum 10% of the gross site area is to be dedicated for use as public open space within any proposal for development that can connect to a network of public open space and green routes.



Figure 5 Public open space and hierarchy of green space (Figure 2.7.2 Draft Tallaght LAP 2020)

Residential and Community

Section 5 of the Draft LAP on Residential and Community development identifies that for of sustainable, mixed and balanced community there must be a mix of housing types across the Draft LAP area. In this regard the Draft LAP discourages the domination of mono-tenure type of homes within the Plan lands. Section 5.2.1 of Draft LAP on Housing Mix specifies that: *It is policy of the Council to ensure an appropriate housing mix is provided within the LAP lands, therefore a minimum of 30% of units within any new residential development (in the form of either apartments or houses, but excluding student accommodation schemes) shall have a minimum of 3 bedrooms.*

According to Section 5.2.2: *It is policy of the Council to ensure that a mix of tenure is achieved in order to provide an appropriate balance which will promote social integration in Tallaght.*

c for the scope of plan lands.

It is a required within Section 5.3.7 of the Draft LAP that development applications for 100+ units should be accompanied by a statement of compliance with the social infrastructure assessment detailing the implementation and phasing program that demonstrate the availability of adequate services for their development.

In this regard we refer to the EIAR submitted with this application and Chapter 5 which outlines the range of existing social infrastructure (including open spaces/recreation) and how the proposed development will provide for additional services in this regard, including a creche, local retail units and new public open spaces.

Broomhill Neighbourhood

The Broomhill Neighbourhood is designated in the Draft LAP to remain a predominantly Mixed Business Area but with the potential for residential development fronting onto the Airton and Greenhills Roads. The acceptability of new residential development will be subject to how they can effectively integrate with the existing surrounding commercial/industrial uses. The neighbourhood is expected to deliver between 1,250 and 1,667 dwellings. The current proposal for 502 units is considered acceptable in this regard. It is also noted that the recent Chief Executive’s Report on submissions to the Draft LAP recommends additional policy to state that new residential development in the Broomhill neighbourhood will be promoted on the southern side of Airton Road, which means the existing business parks to the north of Airton Road are recommended to remain commercial/employment.

Gross Area	52.7 hectares	
Land Use	Mixed business area	
Land Use Mix	Predominantly business area with more mixed use residential development fronting along Greenhills Road and Airton Road, subject to integrating effectively with existing surrounding uses.	
Plot Ratio Range	0.75:1 (Low) 1:1 (High)	
Building Height	Primary Frontage	(6-7 Storeys Residential)+ 1 recessed), (5-6 storeys non-residential) + 1 recessed. See accompanying Overall Urban and Route Structure drawing
	Secondary Frontages	(4-6 storeys Residential, 3-5 storeys non-residential. See accompanying Overall Urban and Route Structure drawing
	Other Frontages	3-4 storeys (Res/Non-Res)
Open Space	Local green corridors Local Pocket Park along Airton Road or Linear Park along Airton Road and along southern boundary with TUD/TC with new building frontage overlooking.	

Table 12 Development management guidelines – Draft Tallaght LAP 2020-26

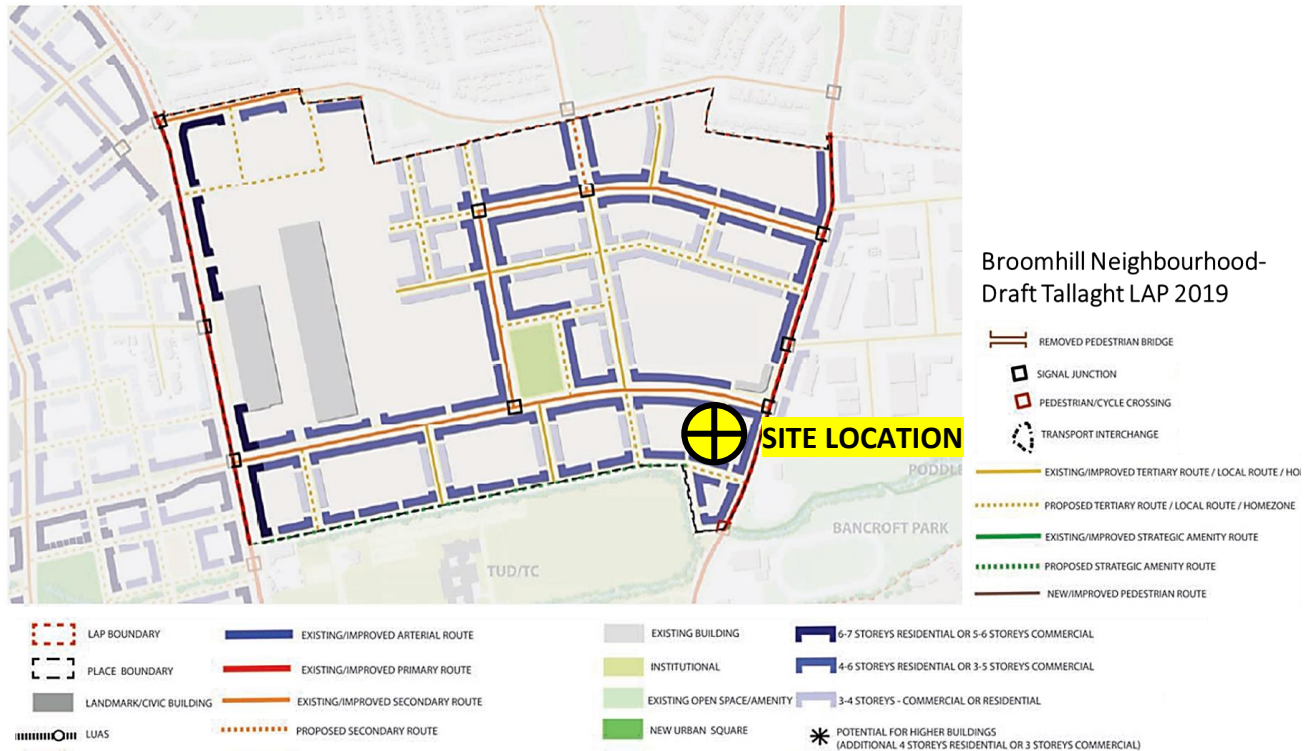


Figure 13 Broomhill Neighbourhood

Broomhill		
Infrastructure Requirements for the Broomhill Area		
Physical Infrastructure	Physical	<ul style="list-style-type: none"> Enhanced public realm including improved connectivity to public transport nodes. (AL – Developer/SDCC) Enhancement of Airton Road, including improved pedestrian and cyclist links (AL – Developer/SDCC)
	Open Space	<ul style="list-style-type: none"> Delivery of high quality public open space in tandem with residential development along Airton road in the form of: <ul style="list-style-type: none"> Centrally located pocket park, or Linear park along length of Airton Road between new building frontage and existing road. Delivery of green amenity corridor along the southern boundary with TUD/TC in tandem with development
Associated Infrastructure	Childcare	<ul style="list-style-type: none"> The indicative unit growth for the area would generate a requirement for 103 spaces⁶. All new residential developments and particularly those in excess of a 10 minute walk-time from existing childcare facilities with sufficient capacity to accommodate that development, will be required to comply with the minimum childcare standards and the provision of childcare facilities as part of specific developments. (AL – Developer driven based on demand analysis)
	Health	<ul style="list-style-type: none"> Primary medical care and other services such as GP's will be facilitated on an ongoing basis in consultation with the HSE to support population growth within Broomhill. The delivery of such facilities will be demand driven as the area develops. The SIA indicates an average of 1.79 GP's/1000 population should be provided. (AL – HSE/Developer in consultation with SDCC)

Table 14 Neighbourhood/ Sub Neighbourhood Requirements (Section 8.4.5)

EVALUATION OF CONSISTENCY

The proposed development is for a mixed use, residential scheme in line with the County Development Plan and national and regional policy.

Whilst the proposed development is generally in accordance with the draft Local Area Plan there are a number of specific policies/standards which the proposed development deviates from. These are elaborated below. It is noted that under Section 18(3)(a) the Board may have regard to the provisions of a Draft LAP when considering a planning application made under Section 34 of the Planning & Development Act. However, this does not appear to apply to SHD applications made to the Board under the Planning and Development (Housing) and Residential Tenancies Act 2016.

Building Height

The draft LAP identifies building heights of between 4 and 7 storeys residential (with the potential for an additional top storey recessed) on the basis of Greenhills Road being a Primary Route and Airton Road being a Secondary Route (as per Figure 2.1 of the Draft LAP and the Broomhill Development Table on page 47.) However, Figures 2.4 and 3.13 suggest that the building height range for the site is 4-6 storeys.

It is also noted that the recent Chief Executive's Report on the submissions to the Draft LAP has proposed an amendment to the LAP policy to allow for additional building height at certain key locations:

"To reflect the importance of placemaking at key public transport stops and key public spaces, flexibility in relation to the plot ratio range and the potential for higher buildings (2-4 storey increase on typical levels set in the LAP) may be considered at certain locations which are considered to be key or landmark sites, subject to exceptional design which creates a feature of architectural interest, a significant contribution to the public realm at these locations and mixed uses at ground floor level. These requirements are subject to criteria for taller buildings set out in Section 2.6.2. This provision may apply where the site is directly adjacent to the following: • High capacity public transport stops (i.e. a Luas stop or high frequency bus stop (i.e. 10- minute peak hour frequency) on a dedicated bus lane)."

It is considered that the proposed 4-8 storey development is an acceptable height range for this key site and, notwithstanding the draft LAP, is in accordance with national policy in particular the Building Heights Guidelines.

Plot Ratio

The Draft LAP indicates a maximum plot ratio of 1:1 for the subject site. This is considered unreasonably low for a key site that has the potential to accommodate a significant development of scale and bearing in mind that the Development Plan only requires 10% minimum public open space. The recent Chief Executive's Report recommends that the plot ratio range be increased to 1.5 where sites are close to high capacity public transport.

The current proposal, at a plot ratio of 1.8. which is considered appropriate having regard to the national policies outlined above.

Mix

Section 5.2.1 of the Draft LAP states that a minimum 30% of new residential developments should be 3-beds. This draft policy is in conflict with SPPR 1 of the national Apartment Guidelines which set no minimum requirement for 3+ bedrooms.

Section 5.2.2 of the Draft LAP states that a minimum of 30% of dwelling units in any new scheme should be for private sale and that a maximum of 60% shall be for rent. This policy is also considered contrary to national policy which does not seek to apply specific restrictions of whether apartment schemes are for sale, rent or a combination of the two.

Open Space

Section 8.4.5 of the LAP states an objective for a linear park along Airton Road "*between new building frontage and existing road.*" The recent Chief Executive's Report suggests that the park can be provided by retaining the existing building line set back along the southern side of Airton Road.

In response we would contend that the imposition of a linear park objective along the southern side of Airton Road, based on existing building lines, is unreasonable and contrary to good urban design and streetscape. There is no consistent existing building line along Airton Road to the south whilst the areas between the buildings (which are in active use) and the public road are currently used in a variety of ways including extensive surface car parking.

Enforcing a linear park of significant depth alongside the very straight Airton Road will result in a poor building height to street width ratio, and poor urban edge definition. It is also arguably contrary to DMURS. The amenity benefits of the park, north of the future residential areas of Broomhill and alongside a busy commercial road trafficked by a wide range of industrial and commercial uses to the north is also questionable.

A more attractive linear urban park could be provided south of a new building line established along the southern side of Airton Road which would allow pedestrians and cyclists to travel east-west completely separate from the vehicular road, as is presented in the current application (and supporting masterplan).

Overall, it is considered that the proposed development is in broad accordance with the Draft LAP, with the exception of certain objectives and standards which are considered contrary to Section 28 national planning guidelines, and which the Board are encouraged to give precedence to.

5. CONCLUDING REMARKS

It is respectfully submitted that the proposed development will provide an appropriate form of high-quality mixed-use development for this REGEN zoned site. The proposed residential and community uses are consistent with the planning policy for the site.

It will provide for an efficient use of zoned land that is accessible to public transport, integrated with the existing and future cycle and pedestrian links and within a reasonable distance of major employment centres and excellent public transport. It will also make best use of existing social and community infrastructure while also providing additional facilities to this part of Tallaght.

The proposal is consistent with all relevant national and regional planning policies, including policies with respect to compact growth, infrastructure, housing quality and urban design. Currently the site is disused and derelict the proposed development will result in the regeneration of the lands putting it back into efficient use in accordance with SDCC development plan 2016. The design and layout of the proposed development has been prepared following pre-application consultation with the Planning Authority under Section 247 prior to the submission to An Bord Pleanála.

This statement has demonstrated the compliance of the development with the following:

- *Ireland 2040 Our Plan - National Planning Framework (2018).*
- *Rebuilding Ireland – Action plan for housing and homelessness 2016*
- *Regional Planning Guidelines for the Greater Dublin Area (2010 – 2022).*
- *Regional Spatial and Economic Strategy 2019-31*
- *Greater Dublin Area Transport Strategy 2016-35*
- *Guidelines for Planning Authorities on Urban Development and Building Heights (2018).*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2018).*

- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual.*
- *Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities.*
- *Quality Housing for Sustainable Communities (2007).*
- *Design Manual for Urban Roads and Streets (2019).*
- *Guidelines for Planning Authorities on Childcare Facilities (2001).*
- *Smarter Travel – A New Transport Policy for Ireland (2009-2020).*
- *Retail Planning Guidelines for Local Authorities 2012*
- *Retail Strategy for The Greater Dublin Area, 2008-2016*
- *The Planning System and Flood Risk Management (2009).*
- *South Dublin County Council Development Plan 2016- 2022*
- *Tallaght Town Centre LAP 2006-12(Extended to 2016)*
- *Proposed Draft Tallaght Town Centre Local Area Plan 2020-26*

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.