

**STATEMENT OF RESPONSE TO AN BORD PLEANÁLA
OPINION**

FOR A

**PROPOSED SHD RESIDENTIAL DEVELOPMENT AT
FORMER GALLAHERS SITE, AIRTON ROAD**

PREPARED BY



ON BEHALF OF

GREENLEAF HOMES LIMITED

February 2020

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1. INTRODUCTION

An Bord Pleanála issued a Direction dated the 24th October 2019 along with a Notice of Pre-Application Consultation Opinion also dated the 24th October 2019, which stated that it is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development. The Board raised two issues that need to be addressed to result in the application constituting a reasonable basis for an application for strategic housing development.

1. Principle of Proposal

Further consideration/justification of the documents as they relate to the principle of the proposed development in the context of the overall re-development of lands within the applicant's ownership, as outlined in the blue in the submitted documentation. The applicant should satisfy themselves that the design strategy for the site, as outlines in red, provides the optimal outcome for the overall lands and should address why the proposed development could not be considered to be ad hoc, piecemeal, premature development in the absence of proposals for the redevelopment of the wider lands within the applicants ownership at this location. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

2. Urban Design and Active Frontage

- (i) *Further consideration of the documents as they relate to the detailed design of the proposed development. The documentation submitted at application stage should demonstrate that the elevational treatments, external finishes, materials and detailing of the proposed buildings, together with the landscaping and surface/boundary treatments of the outdoor spaces would be of a sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term. The interface between the proposed blocks and the public realm should also be addressed.*
- (ii) *Further consideration and/or justification of the documents as they relate to the ground floor uses of the proposed scheme, in particular along Greenhills Road, Airton Road and surrounding the 'Courtyard Open Space' in terms of the creation of an active and vibrant streetscape at this location. A Design Statement addressing the criteria contained within section 11.2.4 of the South Dublin County Development Plan 2016 in relation to development within such regeneration zones should be submitted.*

Furthermore, the Board requested, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, that *in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:*

1. *Daylight/Sunlight analysis, showing an acceptable level of residential amenity for future occupiers of the proposed development, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development. A report which addresses micro-climatic*

impacts on areas of open space, together with mitigation measures, if considered necessary, should be submitted.

2. *Contour/site level map accurately and legibly showing levels across the site.*
3. *Additional details in relation to the layout and design of the proposed areas of open space and the desire to ensure that these are attractive, accessible areas, conducive to appropriate social interaction and that offer a high amenity value for all users. A detailed landscaping plan for the site which clearly sets out proposals for hard and soft landscaping including street furniture, where proposed, should be included. Additional cross sections, CGIs and visualisations should be included in this regard. Clear differentiation between areas of open space should be shown.*
4. *Construction and Demolition Waste Management Plan.*
5. *Waste Management Details.*
6. *Ecological Impact Assessment.*
7. *A life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018). This report should specifically address proposed materials, finishes and detailing which seek to create a distinctive character for the development, avoiding blank facades, dead frontages and render finishes. The documents should also have regard to the long-term management and maintenance of the proposed development.*
8. *A schedule of floor areas for all proposed units.*
9. *Additional details in relation to surface water management for the site, having regard to the requirement of the Drainage division as indicated in Appendix B of the Planning Authority's opinion. Any surface water management proposals should be considered in tandem with a Flood Risk Assessment specifically relating to appropriate flood risk assessment that demonstrates the development proposed will not increase flood risk elsewhere, and, if practicable, will reduce overall flood risk.*
10. *Additional details in relation to transport and parking having regard to the report of the Transportation Division of the planning authority as detailed in Appendix B of their opinion.*

2. STATEMENT OF RESPONSE TO ISSUES RAISED

The following sets out how the applicant has addressed the issues raised by the Board in respect of the proposed development. Any amendments to the design submitted at Stage 2 required to address the issues raised are also outlined below. Please note that these responses should be read in conjunction with the accompanying detailed documentation prepared by McGill Planning, Whitehill Ecology, Mitchell Associates Landscape Architecture, Ferreira Architecture, Barrett Mahony Consulting Engineers, Traynor Environmental, IAC, 3D Design, IN2 Environmental Consultants, ILTP, Wildlife Surveys Ireland and Renaissance Engineering consultants.

Response to Issue 1: Principle of Proposal

An Bord Pleanála stated the following:

Further consideration/justification of the documents as they relate to the principle of the proposed development in the context of the overall re-development of lands within the applicant's ownership, as outlined in the blue in the submitted documentation. The

applicant should satisfy themselves that the design strategy for the site, as outlines in red, provides the optimal outcome for the overall lands and should address why the proposed development could not be considered to be ad hoc, piecemeal, premature development in the absence of proposals for the redevelopment of the wider lands within the applicants ownership at this location. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

Applicant Response

As outlined in blue on the Site Location Map, the adjoining lands to the west/south-west of the application site are also controlled by Airton Road Properties Ltd., the landowner of the application site who has given consent to Greenleaf Homes Ltd. to lodge the current application.

Unlike the application site, these adjoining lands are not vacant but are leased and occupied by An Garda Siochana as a car compound. Notwithstanding this current arrangement, the lands, like the application site, are zoned REGEN in the SDCC County Development Plan and are also designated for redevelopment under the draft Tallaght Town Centre Local Area Plan.

An elementary masterplan was submitted at SHD Stage 2 for the overall landholding to indicate future integrated development potential. However following the Stage 2 pre-planning meeting a more comprehensive masterplan exercise was carried out by the design team to ensure that the overall design strategy (which the specific proposal for the current vacant lands (Phase 1) is based on) would not unduly hinder the proper redevelopment of the remainder of the lands (Phase 2) in the future and also that the Phase 1 lands would in the interim deliver an attractive layout and amenity for residents.



Figure 1 Masterplan sketch for both the sites

A more comprehensive masterplan for the development of all of the lands within the control of the consenting owner is now submitted with this SHD application. Please see the Masterplan Document prepared by Ferreira Architects along with the Landscape Masterplan for the site prepared by Mitchell Associates.

The design and layout of the buildings is cognisant of both a) the need for the current application to stand alone and provide an attractive development in its own right in the short to medium term, while also b) allowing the area to the south and west of the site to reach its full development potential in the long term creating a comprehensive, cohesive and attractive urban environment overall.

The overall masterplan area for this development measures c. 3.8ha. The area of the site the subject of this application is c.2.79ha.

All of the land within the control of the consenting owner has the same zoning: REGEN “*to facilitate enterprise and/ or residential led regeneration*”. As such the principle of significant residential development on all of this land is permitted in principle under the zoning and these lands.

The overall lands are also designated for significant residential development in the Tallaght Town Centre LAP with the site seen as particularly suitable for same given its location proximate to high quality public transport, local services, education, public open spaces and amenities (including the Tymon/Poddle River adjoining to the south), also the urban design benefits of having frontage onto two main streets,, Greenhills Road and Airton Road.

As a result, it was considered appropriate from the outset to create a strong urban edge along the active Greenhills Road and Airton Road, whilst utilising the stream and green infrastructure in the south of the site to provide a different residential character.

The masterplan area is defined by a series of open spaces (public and communal) that will all receive excellent sunlight and daylight and that are interconnected by a series of car-free public routes, primarily running east-west and north-south through the lands,

These provide both residents and visitors a variety of options to travel through the site and connect with local services, public transport and amenities in the wider area.

Furthermore, the Masterplan illustrates how the first phase of development, now brought forward for planning, includes for the main east-west and north south streets through the site, and will therefore establish the spine of the Masterplan from the outset.

The Board will also note that a number of modifications were made to the Phase 1 application from that presented at Stage 2, namely changes to Blocks A, B and F (with associated reduction in units from 544 to 502). This was in order to align with the design principles of the Masterplan and to ensure that the main axial streets/public areas through the heart of the development are provided for in full within the Phase 1 application.

The interim boundary between Phase 1 and Phase 2 will be full landscaped as part of this application as outlined in the designs provided by Mitchell & Associates and as illustrated in the CGIs submitted.

The Masterplan and revisions to Phase 1 (from that originally submitted at SHD Stage 2) will ensure that the layout and quantum of development foreseen for Phase 2 can be achieved in full and will not be prejudiced by the development of Phase 1. Equally the layout and amenities of the Phase 1 are optimised so that the development can stand alone and operate successfully as an attractive new residential development for future residents until such time as Phase 2 occurs.

The approach to the overall layout of the masterplan area, and the application site, also ensures that not only these lands but also the adjoining sites, outside of the control of the consenting owner, can come forward in a comprehensive manner and unlocks the potential of all of the surrounding sites to this application site.

Overall, the current proposal, which is in accordance with the submitted detailed masterplan, represents an appropriate and cohesive development for the Phase 1 lands. It will, of itself, deliver a high-quality and serviced residential development with a fully developed network of pedestrian streets and open spaces that will provide high levels of amenity for future residents and will provide easy access to public transport and other services in the locality. The design and layout of Phase 1 also ensures that the Phase 2 lands can be brought forward for redevelopment in the future and can be fully integrated with the overall Masterplan.

Response to Issue 2: Urban Design and Active Frontage

An Bord Pleanála stated the following:

- (i) *Further consideration of the documents as they relate to the detailed design of the proposed development. The documentation submitted at application stage should demonstrate that the elevational treatments, external finishes, materials and detailing of the proposed buildings, together with the landscaping and surface/boundary treatments of the outdoor spaces would be of a sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term. The interface between the proposed blocks and the public realm should also be addressed.*
- (ii) *Further consideration and/or justification of the documents as they relate to the ground floor uses of the proposed scheme, in particular along Greenhills Road, Airton Road and surrounding the 'Courtyard Open Space' in terms of the creation of an active and vibrant streetscape at this location. A Design Statement addressing the criteria contained within section 11.2.4 of the South Dublin County Development Plan 2016 in relation to development within such regeneration zones should be submitted.*

Applicant Response

Please see the enclosed Architectural Design Statement and the Masterplan document by Ferreira Architects along with the Landscape Architectural Design Statement by Mitchell Associates.

The proposed elevational treatment has been significantly modified from documentation submitted as part of the Section 5 Consultation.

Accordingly, the proposed development will be finished with high quality durable materials that will provide an attractive finish to the development. The proposed finishes on the buildings are complemented by the landscaping and surface/ boundary treatments. The relationship between each block and the proposed and existing public realm along Airton Road and Greenhills Road, including how it may change as a result of Bus Connects proposals along with the proposed masterplan have been carefully considered within the application.

The proposed development has re-examined the location of the retail units and the creche and how they interact with both the Greenhills Road, Airton Road and the main public open space within the heart of the development. The revised layout provides for the creche and also some interesting open spaces along the internal route which would become a street through the development in any future scheme.

Along Airton Road and Greenhills Road a strong urban edge is provided with commercial elements at the ground floor level. These commercial units complement the existing commercial development in the area while also providing activity in these areas. Units along Greenhills road at ground floor level in Blocks D and E-F have included own door access units. This improves the street animation and interface contributing to passive surveillance of the street. It is envisaged that the relationship with the ground floor of the corner unit, the open courtyard and the creche will have a key relationship in creating activity within this space enabling a safe largely car free area for children to play in and adults to enjoy within an otherwise urban area. In blocks E and F, the car parking has been moved into a basement car park rather than in an undercroft parking area. This creates more visibility and flow between the areas, enhances the open space to the south and generally creates more of a draw through the site. This is in line with the current Regen zoning for the site.



Figure 1 Own door units proposed at Ground level in Block D



3. STATEMENT OF RESPONSE TO SPECIFIC INFORMATION REQUIRED

The following sets out how the applicant has addressed the Board's request for additional specific information in respect of the proposed development. Please note that these specific information requests should be read in conjunction with the accompanying detailed documentation prepared by McGill Planning, Whitehill Ecology, Mitchell Associates Landscape Architecture, Ferreira Architecture, Barrett Mahony Consulting Engineers, Traynor Environmental, IAC, 3D Design, IN2 Environmental Consultants, ILTP, Wildlife Surveys Ireland and Renaissance Engineering consultants.

Response to Specific Item 1: Daylight/Sunlight and micro climatic studies

An Bord Pleanála stated the following:

Daylight/Sunlight analysis, showing an acceptable level of residential amenity for future occupiers of the proposed development, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development. A report which addresses micro-climatic impacts on areas of open space, together with mitigation measures, if considered necessary, should be submitted.

Applicant Response

An analysis of the Daylight/ Sunlight has been carried out by IN2 for the site the results of which show that all of the units meet the required standards both internally and in the private, communal and public open spaces. All the proposed amenity spaces within the development was found to be compliant with BRE requirements by achieving more than 97% daylight availability. The internal daylight analysis found that 98% of rooms within the apartment blocks exceeded the minimum BRE requirements (1307 of 1340rooms), with the remaining living spaces all achieving in excess of 1.0% average daylight factor ensuring no sub quality spaces throughout the development

A microclimate wind report has also been carried out. This has found that this development is appropriate and that only minor mitigation measures are required. Pedestrian comfort was analysed for the proposed layout at ground level landscaped areas, podium level amenity spaces, roof gardens and along balconies. They are predicted to be well suited to their intended use as amenity spaces with good sheltering from the wind.

Response to Specific Item 2: Contour/site level map

An Bord Pleanála stated the following:

Contour/site level map accurately and legibly showing levels across the site.

Applicant Response

Please see the enclosed topographical survey of the existing site by Geodata included with this application. The site is relatively flat, and the site plan and landscape plan submitted include levels as required.

Response to Specific Item 3: Layout and design of the proposed areas of open space

An Bord Pleanála stated the following:

Additional details in relation to the layout and design of the proposed areas of open space and the desire to ensure that these are attractive, accessible areas, conducive to appropriate social interaction and that offer a high amenity value for all users. A detailed landscaping plan for the site which clearly sets out proposals for hard and soft landscaping including street furniture, where proposed, should be included. Additional cross sections, CGIs and visualisations should be included in this regard, Clear differentiation between areas of open space should be shown.

Applicant Response

Please see the enclosed drawings and landscape design report by Mitchell Associates. This demonstrates that the landscaping plan for this area provides for a series of attractive, accessible, individual open spaces all interconnected within one another and the wider area and designed with high quality hard and soft landscaping materials.

The landscape information is supplemented with CGIs prepared by 3D Design Bureau which illustrate how the open spaces will be laid out and differentiated.

Response to Specific Item 4: Construction and Demolition Waste Management Plan

An Bord Pleanála stated the following:

Construction and Demolition Waste Management Plan

Applicant Response

An Outline Construction and Demolition Waste Management Plan prepared by Barrett Mahony Civil Engineers for the proposed development is submitted with the application.

Response to Specific Item 5: Waste Management Details.

An Bord Pleanála stated the following:

Waste Management Details.

Applicant Response

Please see the enclosed Operational Waste and Recycling Management Plan by Traynor Environmental for the proposed mixed use development.

Response to Specific Item 6: Ecological Impact Assessment

An Bord Pleanála stated the following:

Ecological Impact Assessment

Applicant Response

Ecology and biodiversity are assessed in full within the EIAR submitted with the application. Independent Ecological Impact Assessment Report along with Appropriate Assessment Screening Report by Whitehill Environmental is also submitted with the application.

Response to Specific Item 7: Building Life Cycle Report

An Bord Pleanála stated the following:

A life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018). This report should specifically address proposed materials, finishes and detailing which seek to create a distinctive character for the development, avoiding blank facades, dead frontages and render finishes. The documents should also have regard to the long-term management and maintenance of the proposed development.

Applicant Response

Please see the Building Life Cycle Report completed by Renaissance Engineering Consultants.

Response to Specific Item 8: Schedule of Accommodation Areas

An Bord Pleanála stated the following:

A schedule of floor areas for all proposed units.

Applicant Response

Please see the Housing Quality Audit (HQA) prepared by Ferreira Architecture submitted with this application.

Response to Specific Item 9: Surface Water Management

An Bord Pleanála stated the following:

Additional details in relation to surface water management for the site, having regard to the requirement of the Drainage division as indicated in Appendix B of the Planning Authority's opinion. Any surface water management proposals should be considered in tandem with a Flood Risk Assessment specifically relating to appropriate flood risk assessment that demonstrates the development proposed will not increase flood risk elsewhere, and, if practicable, will reduce overall flood risk.

Applicant Response

Please see the enclosed drawings and reports (particularly the Infrastructure Design Report) prepared by Barrett Mahony Consulting Engineers which addresses the surface water issues raised by South Dublin County Council in relation to this development. A Site Specific Flood Risk Assessment has been carried out for this site and has demonstrated that it will not increase the risk of flood either on this site or elsewhere.

Response to Specific Item 10: Additional transportation and parking studies

An Bord Pleanála stated the following:

Additional details in relation to transport and parking having regard to the report of the Transportation Division of the planning authority as detailed in Appendix B of their opinion.

Applicant Response

Please see the enclosed drawings and report by Barrett Mahony Consulting Engineers (particularly the Infrastructure Design Report) prepared by Barrett Mahony Consulting Engineers which addresses the transportation issues raised by South Dublin County Council in relation to this development.

4. CONCLUDING REMARKS

This report sets out how the various issues raised in the ABP Opinion in relation to the proposed development have been addressed in the revised design as proposed. As noted above, the provision of a masterplan for the wider lands in the control of the consenting owner, along with associated alterations within the layout and design have resulted in an improved scheme with a high quality and sustainable mixed use residential and commercial development that is consistent with the proper planning and sustainable development of the area.

This is an ideally located site which has high levels of connectivity to existing community and social infrastructure. The proposed development will increase connectivity creating more permeable routes through the site and into the surrounding area which will be of benefit to the existing community and future residents.

This report also sets out how the various additional specific information requests made by the Board in their opinion have been addressed. As the reports have been developed some further minor amendments/ revisions have been made to the scheme to ensure a high quality and sustainable development that is consistent with the proper planning and sustainable development of the area and which accords with all relevant national, regional and local planning policy.