



THORNTON O'CONNOR
TOWN PLANNING

Planning Report and Statement of Consistency

Prepared in Respect of a Proposed Mixed-Use Development that Constitutes a Large-Scale Residential Development Application at

Belgard Square East, Belgard Road and Old Blessington Road, Tallaght, Dublin 24

Prepared on Behalf of Midsal Homes Limited

November 2025

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South Dublin County Council
County Hall
Belgard Square North
Tallaght
Dublin 24

Wednesday, 19th November 2025

Dear Sir/Madam,

RE: PLANNING APPLICATION IN RESPECT OF A MIXED-USE DEVELOPMENT THAT CONSTITUTES A LARGE-SCALE RESIDENTIAL DEVELOPMENT PROPOSED AT BELGARD SQUARE EAST, BELGARD ROAD AND OLD BLESSINGTON ROAD, TALLAGHT, DUBLIN 24

1.0 INTRODUCTION

Thornton O'Connor Town Planning¹, in association with Donnelly Turpin Architects² (DT), Torque Consulting Engineers³ (Torque), NRB Consulting Engineers⁴ (NRB), Bruton Consulting Engineers⁵, Renaissance Engineering⁶ (Renaissance), Veelite⁷, The Tree File⁸, Studio Glasú⁹, DNV¹⁰, 3D Design Bureau¹¹ (3DDB), AWN Consulting¹² (AWN), Wave Dynamics Acoustic Consultants¹³, ISM¹⁴, Lawler Sustainability¹⁵, Purser¹⁶, O'Dwyer & Jones Design Partnership¹⁷, IAC¹⁸ and Mulcahy McDonagh & Partners¹⁹, has been retained by Midsal Homes Limited²⁰ to prepare and submit this Planning Application for a Large-Scale Residential Development (LRD).

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¹⁹ No. 54 Northumberland Road, Ballsbridge, Dublin 4

²⁰ Suite 112, Q House, 76 Furze Road, Sandyford, Dublin 18

The LRD is a mixed-use proposal principally comprising: 199 No. residential units (150 No. residential units and 49 No. later living units); and 2,123 sq m of commercial and community use floor space, at a site of 1.19 Ha located at Belgard Square East, Belgard Road and Old Blessington Road, Tallaght, Dublin 24.

1.1 Description of the Proposed Development

The full description of development is as follows:

"Midsal Homes Limited intends to apply for permission for a Large-Scale Residential Development (LRD) at a site of approximately 1.19 Ha at Belgard Square East, Belgard Road and Old Blessington Road, Tallaght, Dublin 24. The main development site (approximately 0.91 Ha) is generally bound: to the north by Old Blessington Road; to the east by Belgard Road (R113); to the south by McDonald's Restaurant property (D24 HW74); and to the west by Belgard Square East. The site also includes parts of the carriageways and verges of Belgard Square East, Belgard Road and Old Blessington Road (approximately 0.28 Ha) for the provision of landscaping, 2 No. pedestrian crossings, accesses/junctions, minor road and footpath works, cycle infrastructure and water services infrastructure.

The proposed development principally comprises: the demolition and removal of existing boundary walls and railings on the main development site's eastern, western and northern sides; and the construction of a mixed-use development in 2 No. blocks (Block A to the south and Block B to the north) with a gross floor area of 23,540 sq m (including basement of 275 sq m) and ranging in height from 1 No. to 7 No. storeys (with mezzanine level) over basement.

The development includes a total of 199 No. residential dwellings (6 No. studios, 47 No. 1-bed, 98 No. 2-bed and 48 No. 3-bed) in the 2 No. blocks, with Block A comprising 49 No. 'senior living' apartment units and Block B comprising 150 No. 'standard' apartment units. The development also includes 2,123 sq m of non-residential floor space, with the following uses proposed: 4 No. retail units (totalling 331 sq m); 4 No. class 1 / class 2 commercial units (totalling 387 sq m); a bicycle sales and repair shop (81 sq m); an off-licence (64 sq m); a bar (151 sq m); a café (87 sq m); a medical centre (210 sq m); a dental practice (72 sq m); a pharmacy (195 sq m); a beauty/health salon (195 sq m); and a crèche (350 sq m) with external play area.

The development also comprises: an undercroft car park accessed via a new entrance/exit at Belgard Square East which provides 58 No. car parking spaces; a gated service lane to the south of Block A, with entrances/exits off Belgard Square East and Belgard Road; 2 No. pedestrian/cycle crossings, at Belgard Square East and Belgard Road; continuation of the northbound cycle lane from Belgard Road onto Old Blessington Road; alteration to the median and northbound right turn at Belgard Road onto Abberley Square; cycle parking; internal communal amenity spaces for the senior living units; hard and soft landscaping, including public open space, communal amenity space and incidental spaces; private amenity spaces (as balconies and terraces facing all directions); boundary treatments; 2 No. sub-stations; plant/operational rooms; bin stores; public lighting; blue roofs; rooftop PV arrays; lift overruns and rooftop opening vents atop both blocks; 4 No. 0.3 m diameter microwave link dishes mounted on 2 No. steel support poles affixed to the Block B lift overrun, all enclosed in radio-friendly GRP shrouds; and all associated works above and below ground."

1.2 LRD Definition

The proposed development is classified as an LRD as defined by the *Planning and Development (Amendment) (Large-scale Residential Development) Act 2021*:

"a) The development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses;

b) The development of student accommodation units which, when combined, contain 200 or more bedspaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon;

c) Development that includes development of the type referred to in paragraph a) and of the type referred to in paragraph b), or

d) The alteration of an existing planning permission granted under Section 34 (other than under subsection 3(a) where the proposed alteration relates to development specified in paragraph a), b), or c)."

As the proposed development includes 199 No. residential units and commercial space of 2,123 sq m (not exceeding 30% of the floor area), it is considered to be an LRD.

1.2 Note on the Apartment Design Guidelines

At the time of lodging this Planning Application, the *Planning Design Standards for Apartments – Guidelines for Planning Authorities* (2025) were in force; providing guidance and instruction in relation to the design of apartments across the State. The proposed development has been designed to accord with its Specific Planning Policy Requirements (SPPRs) and general provisions.

However, we note that a judicial review has been taken in respect of the Guidelines. Thus, we deem it prudent to state that the proposed development does not rely solely upon the Guidelines or take advantage of the greater 'flexibility' introduced by them relative to the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities* (2023). Ultimately, the proposed development accords with the *South Dublin County Development Plan 2022–2023*, and in terms of the application of standards and provisions in either set of the Apartment Design Guidelines, it complies with both.

1.4 Purpose and Structure of this Report

The purpose of this *Planning Report and Statement of Consistency* is to: identify and describe the location and context of the subject site; describe the proposed development; and justify the proposed development and its compliance with key planning policies, objectives and principles.

The Report continues with the following structure:

- **Section 2** – Site Location, Description and Context
- **Section 3** – Planning History
- **Section 4** – Previous Statutory Consultation with SDCC

- **Section 5** – Description of Development
- **Section 6** – Strategic Policy Context and Compliance
- **Section 7** – Local Planning Policy Context and Primary Planning Assessment
- **Section 8** – Planning Administration
- **Section 9** – Conclusion
- **Appendix A**

2.0 SITE LOCATION, DESCRIPTION AND CONTEXT

The following section provides an overview of the site and its location and context.

2.1 Site Location and Description

The subject site, which has a total site area of 1.19 Ha, is located at Belgard Square East, Old Blessington Road and Belgard Road, Tallaght, Dublin 24 (Figure 2.1). The site is brownfield, comprised of existing hardstanding and is 'infill' in nature.

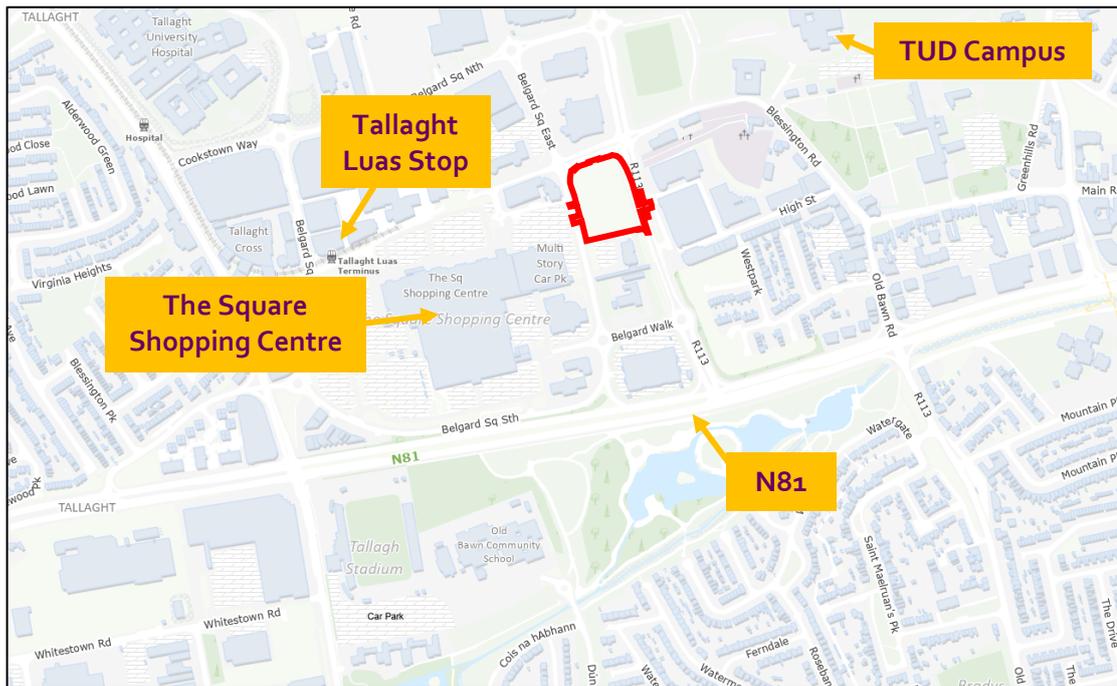


Figure 2.1: Map Demonstrating the Site's Location with the Indicative Boundary of the Subject Site Outlined in Red

Source: Myplan.ie, annotated by Thornton O'Connor Town Planning (2025)

The site is generally bound by: Old Blessington Road to the north; Belgard Road (R113) and Abberley Square to the east; McDonald's Restaurant and Drive Thru to the south; and Belgard Square East to the west. Its boundary treatments are principally block wall and railings to the north, east and west, and blockwork to the south. A Beech hedge defines the outward face of the eastern boundary fronting Belgard Road.

In terms of general connectivity and accessibility, the site is located within a 400 m walk of the Tallaght Luas stop (6-minute walk) and a 250 m walk of The Square Shopping Centre (3-minute walk). The site is approximately a 6-minute walk from Sean Walsh Memorial Park, and a 7-minute walk from the TU Dublin Tallaght Campus. Additionally, the subject site is a 9-minute cycle to Tymon Park.

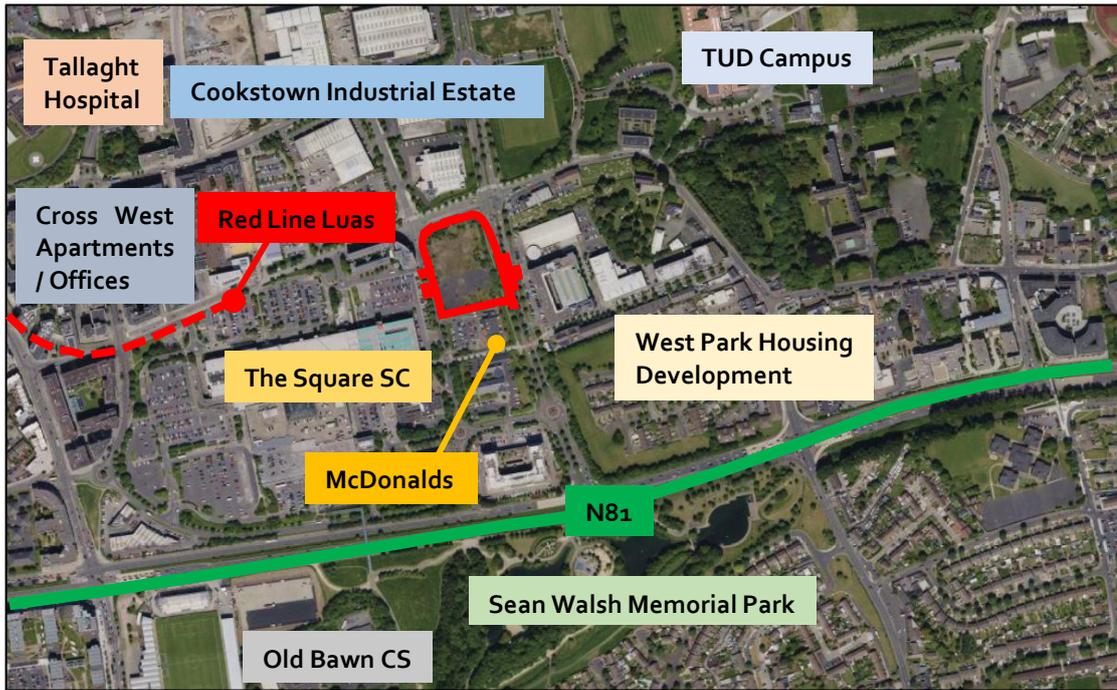


Figure 2.2 Location and Context of the Subject Site, Indicatively Outlined in Red.

Source: Bing Maps, annotated by Thornton O'Connor Town Planning (2025)



Figure 2.3 Street View of Western Side of the Site from Belgard Square East looking North (left) and Northern Side of the Site from Old Blessington Road looking East

Source: Google Maps Street View



Figure 2.4 Street View of the Subject Site from Junction of Belgard Road and Old Blessington Road, looking South-west

Source: Google Maps Street View



Figure 2.5 Street View of the Subject Site from Junction of Belgard Road and Old Blessington Road, looking South-east

Source: Google Maps Street View

2.2 Site Context

The surrounding context of the subject site is generally comprised of a mix of land-uses, including, but not limited to:

- (1) Late 20th century **housing**, at Westpark to the south-east and more recent higher density residential development such as Tallaght Cross West to the north-west;
- (2) **Commercial, industrial** and **warehousing** land-uses in various locations throughout Belgard Square East and North;
- (3) **Commercial** and **office** uses located in Cross West, including SIMMS building, Rivers Building and HSE Primary Care Centre; and
- (4) **Retail** and **commercial** at The Square Shopping Centre to the west.

Larger retail and commercial hubs such as those at City West Business Campus are located approximately 3–4 km to the north-west of the site (as the crow flies). Healthcare in the form of Tallaght University Hospital is approximately 1 km to the north-west.

There is recreational land-use in the form of Sean Walsh Memorial Park (public open space) approximately 430 m to the south (as the crow flies), Tymon Park approximately 2 km to the north-west of the subject site (as the crow flies) and Tallaght Athletics Club located approximately a 18-minute or 1.3 km walk to the north-east of the site.

This part of the city is easily accessed by public transport (discussed below), cycling and walking. It also includes a range of shopping, dining, imbibing and entertainment options.

2.3 Site Accessibility

The subject site is accessible by foot from Tallaght Luas Stop and multiple Dublin Bus stops. Additionally, the accessibility of the site in terms of public transport will be improved by the upgrades proposed under BusConnects. A series of important arterial and orbital roads are located within a short distance of the subject site such as the Cookstown Way, Whitestown Way and the Tallaght Bypass (N81).

2.3.1 Active Modes – Walking & Cycling

Due to the central location of the subject site in Tallaght, future residents will benefit from a wide range of services, facilities and amenities within the village itself and its immediately surrounding area. Figure 2.6 illustrates the approximate 5- and 10-minute walking ranges from the subject site.

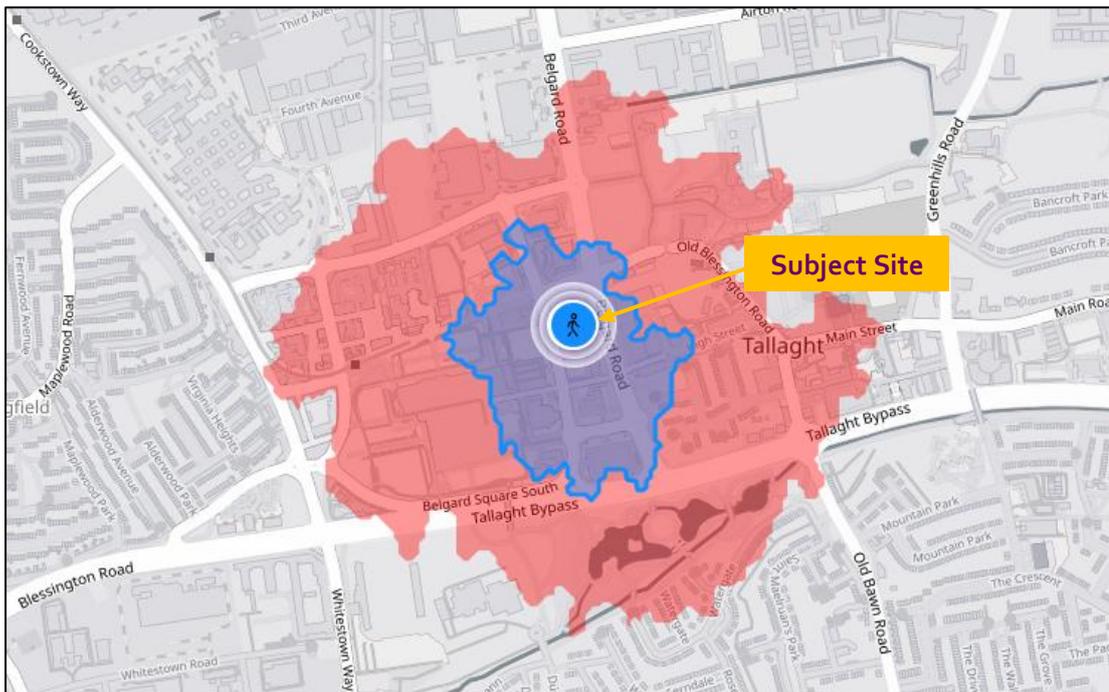


Figure 2.6: 5-minute (red) and 10-minute (blue) walking range from the subject site (indicatively located by walking icon)

Source: [TravelTime.com](https://www.traveltime.com), annotated by Thornton O'Connor Town Planning (2025)

Table 2.1 provides examples of nearby services, facilities and amenities in proximity to the subject site (from the centre of the site to the closest points).

Service, Facility or Amenity	Category	Distance	Walk Time
Zee Barbershop	Barbershop	50 metres	1-minute
Atelier Lash & Beauty	Beauty Salon	80 metres	1-minute
Mc Donalds Restaurant	Fast-food Restaurant	100 metres	1-minute
Tallaght Garda Station	Garda Station	160 metres	2-minutes
Intreo Centre Tallaght	Intreo Centre	190 metres	2-minutes
The Square Shopping Centre	Shopping Centre	250 metres	3-minutes
An Post Tallaght	Post Office	300 metres	4-minutes
Optical Express	Optician	300 metres	4-minutes
Costa Coffee	Café	300 metres	4-minutes
South Dublin County Council Library	Public Library	350 metres	5-minutes
Tallaght Luas Stop	Public Transport	400 metres	6-minutes
Technological University Dublin Tallaght Campus	University	400 metres	6-minutes
St. Maelruain's Church of Ireland	Church	400 metres	6-minutes
Sean Walsh Memorial Park	Public Park	500 metres	7-minutes
Playground Sean Walsh Park	Public Playground	500 metres	7-minutes
Tallaght Cross Pharmacy	Pharmacy	500 metres	7-minutes
Russel Centre	Medical Centre	550 metres	8-minutes
FLYEfit Tallaght	Gym	600 metres	8-minutes
Entrance of Tallaght Hospital	Hospital	650 metres	9-minutes
Old Tallaght Village	Tallaght Village	700 metres	9-minutes
Old Bawn Community School	Secondary School	800 metres	10-minutes
Tallaght Stadium	Football Stadium	1 kilometre	14-minutes

Table 2.1 Services, Facilities and Amenities within the Immediate Environs of the Subject Lands (All Distances and Time are Approximate)

Source: Distances and Walk Times based on Google Maps, Thornton O'Connor Town Planning (2025)

As a result of the site's town centre location, it benefits from excellent existing cycle infrastructure, with Primary Radial, Primary Orbital, Secondary, Feeder and Greenway routes all within the vicinity of the subject lands. It is also proposed under the National Transport Authority's *Greater Dublin Area Cycle Network Plan* to enhance the cycle network in the Greater Dublin Area (Figure 2.7), with a range of cycle infrastructure proposed which will greatly expand coverage, range and comfort for cyclists.



Figure 2.8: The Tallaght LUAS Stop along the Red Line with Higher Density Residential Development 'Cross West' and HSE Office Building Shown in The Background

(Source: [Flickr.com](https://www.flickr.com/photos/148111111/))

2.3.2.2 Existing Bus Services

In addition to the proximate Luas Stop, some 8 No. bus routes serve the subject site via nearby Belgard Square North, Belgard Road and The Square Shopping Centre (Table 2.2).

Route No.	Provider	Route: To and From	Frequency (Peak Time)
27	Dublin Bus	Jobstown – Clare Hall	20-minute
49	Dublin Bus	Tallaght (The Square) – Pearse Street	15-minute
54A	Dublin Bus	Ellensborough – Pearse Street	30-minute
56A	Dublin Bus	The Square – Ringsend Road	>60-minute
65	Dublin Bus	Poolbeg Street – Blessington / Ballymore	30-minute ²¹
77A	Dublin Bus	Citywest – Ringsend	10-minute
S6	GoAhead	The Square – Blackrock Station	15-minute
S8	GoAhead	Kingswood Avenue – Dun Laoghaire Station	15-minute
W2	GoAhead	The Square – Liffey Valley Shopping Centre	15-minute
W4	GoAhead	The Square – Blanchardstown Shopping Centre	15-minute
W6	GoAhead	The Square – Maynooth	30-minute

Table 2.2: Existing Bus Services Serving the Subject Site

Source: Dublin Bus and GoAhead, Collated by Thornton O'Connor Town Planning (2025)

²¹ Please note that the **peak time frequency for this route is 6:30 am to 8:00am only**. The frequency becomes irregular after 9:30 am, please see the full bus timetable for full details:

<https://www.dublinbus.ie/getmedia/40ae0aae-a186-435d-ba63-f9625570cbd1/Route-65.pdf?ext=.pdf>

2.3.2.3 Proposed BusConnects

BusConnects is a national program for investment in the bus network in cities across Ireland. As part of BusConnects Dublin, the bus network will be redesigned, and a more legible and accessible transport network created. A key principle underpinning this network is the notion of 'Abundant Access' which is the idea that through simple connections and transfers between public transport services, more of the city can be accessible to passengers within a reasonable travel time. One such way in which this will be achieved is through the provision of local routes which will provide important connections within local areas, linking local retail centres and facilitating onward transport connections.

The proposed route network in the vicinity of the subject site is shown as Figure 2.9 and will notably enhance connectivity with the surrounding area and beyond in addition to the existing Luas Red Line service.

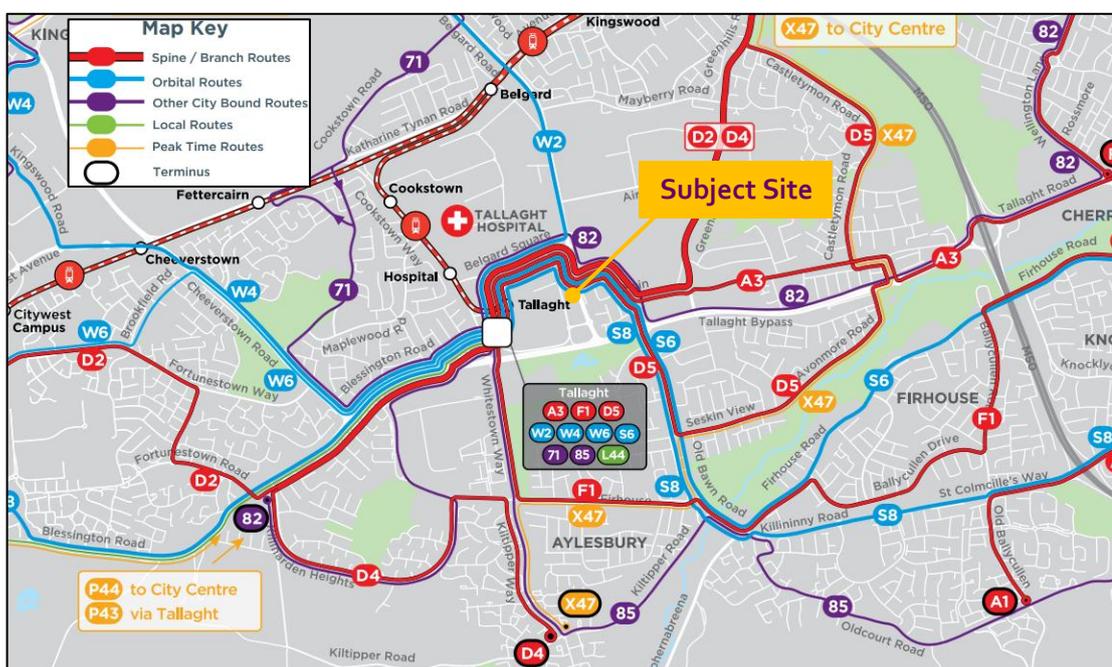


Figure 2.9: Indicative Location of the Subject Site under the new Bus Connects Scheme, Showing Proposed Bus Route Spines in the Dublin 24 Area.

Source: BusConnects Big Picture Map, annotated by Thornton O'Connor Town Planning (2025)

Under BusConnects, an additional 6 No. bus routes are planned that will serve the subject site and its immediate environs. These new routes are illustrated below in Table 2.3.

Route No.	Route Type	Route: To and From	Frequency (Peak Time) ²²
A3	Spine	DCU – City Centre – Tallaght	12-minute
F1	Spine	Charlestown – City Centre – Tallaght	10-minute
D5	Spine	Edenmore – City Centre – Tallaght	30-minute
71	Other City Bound	Tallaght – Ballymount – Warrenmount – East Wall	30-minute
85	Other City Bound	Tallaght – Ballyboden – Harolds Cross – Parnell Square	15-minute ²³
L44	Local	Ballymore Eustace – Blessington – Tallaght	60-minute

Table 2.3: Planned Bus Services Serving the Subject Site

Source: BusConnects

In the context of the existing and proposed light rail and bus services set out above, the site is very well served.

²² According to BusConnects Frequency Table: <https://busconnects.ie/wp-content/uploads/2021/01/a3-frequency-tables-061020-fa.pdf>

²³ Frequency of every 10-minutes 5 No. times a day, Monday to Friday.

3.0 PLANNING HISTORY

According to the SDCC online planning register, there have been 3 No. valid Planning Applications made in respect of the subject site. They are detailed in the sub-sections below.

3.1 SDCC Reg. Ref. SDo4A/0975 – 223 No. Apartments, Retail Units, Offices Over 5–6.5 No. Storeys

SDCC Reg. Ref.	SDo4A/0975
Location/Address	Site at the junction of, The Belgard Road and, Blessington Road, Tallaght, Dublin 24
Applicant	The Wood Partnership
Application Date	4 th January 2006
Brief Development Description	<i>Construction of a retail unit, a class II, two storey retail unit, storage and two storey creche at ground floor level over two level basement car parking with 4 to 5 storey apartments surrounding internal courtyards above ground floor level. The development will range from 5 to 6.5 storeys high. (1) The ground floor element consists of (a) construction of a retail unit of 5965 sq.m with additional storage area of 381 sq.m. (b) construction of an ESB sub-station and meter room, (c) construction of a two storey Class II retail unit with ancillary offices on the upper mezzanine level, total 326 sq.m. (d) construction of a two storey creche 693 sq.m.; (2) the upper floors consist of (a) construction of 3 to 4 floors of apartments with a further recessed penthouse floor providing 42 no. 3 bedroom units, 118 no. 2 bedroom units and 63 no. 1 bedroom units giving a total of 223 no. apartments (area of 14,612 sq.m) of which 15% will be offered as social/affordable accommodation; (b) construction of a residents laundry room 83 sq.m. and children's play room 98 sq.m located at first floor level; (3) construction of an ESB Sub-station and meter room; (4) construction of a 200 space LUAS park and ride car park located at basement level-1; (5) construction of a further basement level-2 car park providing 223 dedicated residential car parking spaces and 91 public parking spaces of which 150 spaces are re-located from the existing car-parking provision; construction of 12 commercial parking spaces and 3 drop-off spaces at surface (ground) level. Also proposed are landscaped courtyards to the first floor residential element, landscaped roof gardens to the central residential block, the construction of a queuing lane serving the basement car park and widening of existing public footpaths. Total site area 0.8981 hectares.</i>
SDCC Decision Date	31 st January 2006
SDCC Decision	Grant Permission
Final Grant Date	16 th March 2006

Under review of this Application, the Planning Authority requested additional information. The Applicant submitted a response to this request, which the Planning Officer found acceptable. In particular, the Planning Officer noted the following positive comments in relation to the proposed development:

- A revised scheme of **195 No. units (217 No. units per hectare)** was acceptable in principle.
- An omission of the 6th floor apartments to the south of the site, reducing the extent of overshadowing in the area to the north of the block. The **permitted development comprised heights of 4–6.5 No. storeys.**
- A 2-storey basement car park was considered acceptable.

Permitted north and west elevations of the subject development are illustrated below in Figure 3.1.

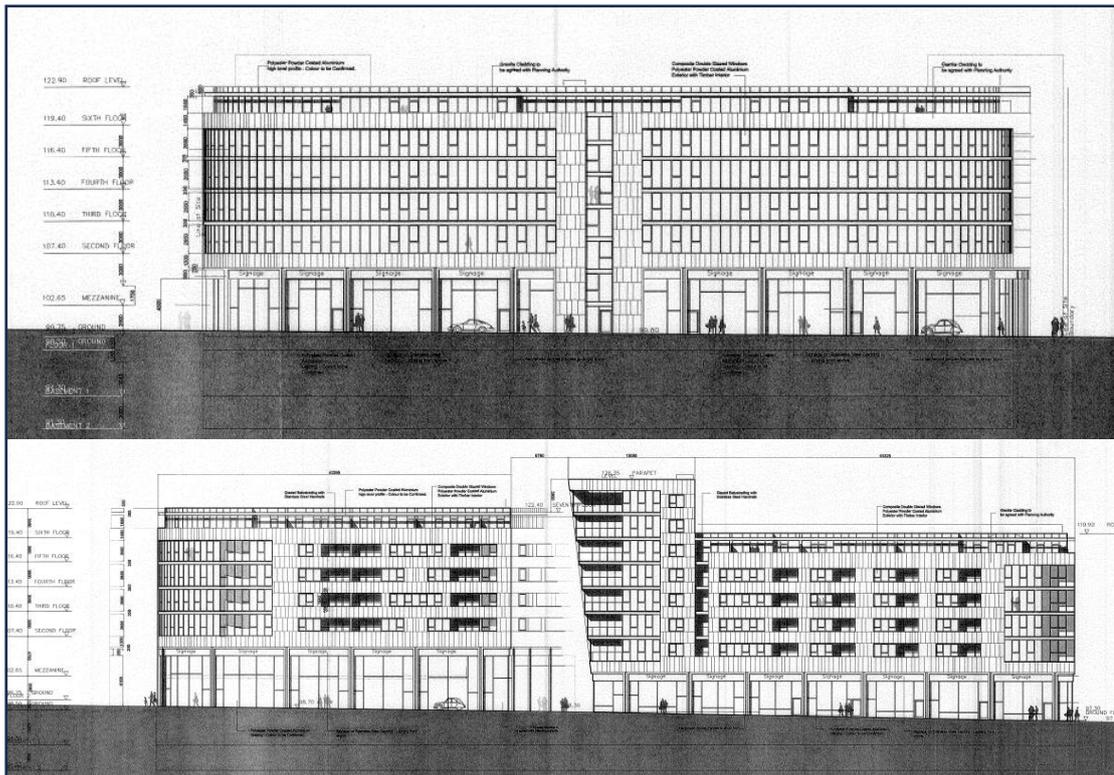


Figure 3.1: North Elevation (Top) and West Elevation (Bottom), of the Granted Scheme.

Source: Spain Courtney Doyle Building Services, as submitted as Additional Information under SDCC Reg. Ref. **SD04A/0975**

SDCC Granted Planning Permission for the proposed development on 16th March 2006.

The duration of this permission expired on 16th March 2011. However, Section 42A of the *Planning and Development Act 2000* (as amended) and Articles 40–47 of the *Planning and Development Regulations 2001* (as amended) allow "a permission where the expiry of the appropriate period occurs during the period beginning on or after 1 January 2009 and ending on or before 31 December 2011, NAMA may make an application to extend the appropriate period- (a) before the expiry of the appropriate period, or (b) **at any time during the period of 2 years beginning on the date of expiry of the appropriate period**".

Subsequently, on 7th March 2013, an Extension of Duration of Permission in accordance with Section 42A was applied for under Reg. Ref. **SD04A/0975/EP** by the Applicant. This was

Granted by the Council on 30th April 2013. Despite this, the development was never constructed and the permission has since lapsed.

3.2 SDCC Reg. Ref. SDogA/0419 – 5 No. Storeys (Over Basement) Mixed-Use, Retail, Car Park

SDCC Reg. Ref.	SDogA/0419
Location/Address	Belgard Square East, Tallaght, Dublin 24
Applicant	Laytar Ltd.
Application Date	23 rd October 2009
Brief Development Description	<i>The construction of a 5 storey over basement level car park mixed use development of 26915 sq.m. gross floor area comprising retail use of 6339 sq.m., together with cafe/restaurant use of 297sq.m. and entrance foyer for the cinema/leisure use of 115sq.m. at ground level; retail use of 6856sq.m. at 1st floor level; leisure/bowling use of 3321 sq.m. together with part cinema foyer/back of house of 2736sq.m at 2nd floor level; a 14 screen multiplex cinema of 6154sq.m. at 3rd floor level; a cinema projector floor of 1097sq.m. at 4th floor level. The development also includes a new landscaped public plaza at the corner of Belgard Square East and Blessington Road together with a new public street linking Belgard Square East to Belgard Road. The development also comprises 2 sub-stations at ground level on the southern elevation onto the proposed new street: provision of 240 no. car spaces and 200 no. bicycle spaces with vehicular access via ramp from Belgard Road and provision of services and plant at basement and roof level. The development also includes all associated site works, boundary treatments, signage locations/zones and landscaping all on a 0.91Ha site bounded by Belgard Road, Blessington Road and Belgard Square East (the former Woodies site).</i>
SDCC Decision Date	18 th February 2010
SDCC Decision	Grant Permission
Final Grant Date	1 st April 2010

Under Reg. Ref. SDogA/0419, Planning Permission was sought for the construction of a 5-storey over basement mixed-use development comprising:

- Retail, café/restaurant and cinema / leisure at ground floor level;
- Retail at first floor level;
- Leisure / bowling and cinema foyer at second floor level;
- Cinema projector mezzanine, at fourth floor level;
- 240 No. car parking spaces and 170 No. bicycle spaces at basement level; and
- Screened plant at roof level.

Some of the notable comments from the *Planner's Report*, that could be of relevance to the subject proposal are summarised below:

- **A plot ratio of 2.7:1 was deemed to be "...an acceptable compromise between that permitted on the application site (2.9:1) and that indicated under the LAP (2.4:1)." [emphasis added]**

- The proposal for a stepped height from 2 No. storeys to 5 No. storeys, with a maximum parapet height of 25 m “...complies with the relevant Building Height Threshold”.

SDCC Granted Planning Permission for the proposed development on 1st April 2010.

Subsequently, on 21st January 2015, an Extension of Duration of Permission was applied for under Reg. Ref. SD09A/0419/EP by the Applicant. This was Granted by the Council on 10th March 2015. However, **the development was never constructed, and permission has now lapsed.**

3.3 ABP Ref. TA06S.313760 – The Haven SHD – 310 No. Apartments, Commercial Units, Crèche

ABP Ref. (SHD)	TA06S.313760
Location/Address	Belgard Road, Belgard Square East, Blessington Road, Tallaght, Dublin 24
Applicant	Ravensbrook Ltd
Application Date	9 th June 2022
Brief Development Description	<i>Mixed-use development including 310 "Build-to-Rent" residential apartments, a creche and a number of commercial units (c. 2,289 sqm) on a c. 1.26 ha site; Consisting of the demolition of existing boundary wall and construction of: c. 2,289 sqm of retail/commercial floor space across 10 units including retail, restaurant/café and Class 2 financial/professional services and office use, and a crèche (257sqm) at ground and first floor levels; 310 build to rent residential apartments including 99 one bedroom units, 203 two bedroom units and 8 three bedroom units within a part 6 to part 12 storey development across 3 blocks over partial basement; c. 2,223 sqm of communal external amenity space provided in the form of a ground floor garden and external terraces at fifth, sixth, seventh and eighth floor levels; c. 1,026 sqm of public open space provided in the form of a central courtyard with landscaped areas at site perimeters; c. 1,785 sqm of resident support facilities and services and amenities provided at basement, ground and first floor levels; Vehicular access to the basement development from a new access point at Belgard Square East; A new tertiary route provided in the southern part of the site linking Belgard Square East and Belgard Road; Provision of 130 car parking spaces (including 8 club car spaces and 6 disabled access spaces) at basement level in addition to 5 set down spaces (4 serving creche) and 1 disabled access space at ground level, layby on Belgard Square East, 6 motorcycle spaces and a total of 763 bicycle parking spaces; Provision of 4 Ø0.3m microwave link dishes to be mounted on 2 steel support pole affixed to lift shaft overrun, all enclosed in radio friendly GRP shrouds, together with associated equipment at roof level at Block B; Provision of 3 ESB substations with switch rooms and plant rooms at basement level, hard and soft landscaped areas, bin and bicycle stores, public lighting, attenuation, green roof, plant at roof level, service connections and all ancillary site development works. The application contains a statement setting</i>

	<i>out how the proposal will be consistent with the objectives of the relevant development plan and local area plan. The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.</i>
ABP Decision Date	11 th June 2025
ABP Decision	Refuse Permission

Permission was sought under ABP Ref. TA06S.313760 for a mixed-use scheme, albeit a Strategic Housing Development (SHD), at the subject site.

Notably, this scheme proposed a plot ratio of 3.4, substantially greater than the maximum standards set out in Section 2.6.1 of the *Tallaght Town Centre Local Area Plan 2020*.



Figure 3.2: CGI of the Proposed Development, viewed from the junction of Blessington Road and Belgard Road

Source: Henry J Lyons Architecture, as submitted under TA06S.313760 (2022)

By Order dated 11th June 2025, An Bord Pleanála decided to Refuse Permission for the development for the following 2 No. reasons:

- Excessive heights, as the *Tallaght Town Centre Local Area Plan 2020–2026* (Local Area Plan) lays out that residential blocks of between 4 No. and 7 No. storeys should be permitted at the subject site, however, the proposed height of the scheme was between 6 and 12 storeys. It was considered that the heights proposed were excessive in the context of Section 28 Guidelines, including the *Apartment Guidelines* (2023) and the *Urban Development and Building Heights Guidelines for Planning*

Authorities (2018), and that the proposed development materially contravened the Development Plan in not complying with the indicative heights set out in the *Tallaght Town Centre Local Area Plan 2020 – 2026*.

- Excessive density, as the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (2024) sets out an acceptable density of 250 dwellings per hectare (dph) for sites within City-Urban Neighbourhood Areas, which the proposed development far exceeded (341 dph). The Board acknowledged that exceptions may be considered in accordance with Section 3.3.6(a) of the Guidelines, allowing densities that exceed 300 dph. However, the Board Order states that this exception is open for consideration on a plan-led basis only and where opportunity sites are identified in relevant statutory plans. The subject site was considered not to be designated as such under the Development Plan or the LAP, and as such would contravene these plans.

It is acknowledged that even if the proposed development under ABP Ref. TA06S.313760 was Granted Planning Permission, the scheme would not likely have been delivered because of viability constraints, primarily (but not solely) due to the basement car park and the associated cost of construction.

3.4 Conclusions of the Site’s Planning History

Overall, it is evident that the subject site represents a prime opportunity to bring underutilised infill land in proximity to regular public transport services such as the Luas and bus back into more appropriate and efficient use. With regard to the recent refusal by the Board in respect of ABP Ref. TA06S.313760 at the subject site, the subject scheme has been informed by the standards prescribed in the LAP. The assessment of the previous applications made on the subject site indicate a historical preference for increased, but moderate plot ratios and density.

4.0 PREVIOUS STATUTORY CONSULTATION WITH SDCC

As required by legislation, the lodgement of this LRD Planning Application has been preceded by 2 No. rounds of consultation with SDCC. These are summarised below.

4.1 Section 247 Pre-Planning Consultation

A Section 247 Pre-Planning Consultation (PPC) meeting was held between representatives of SDCC and the Design Team on 24th October 2024 via Microsoft Teams. The Council assigned the SDCC Pre-Planning Ref. No. LRDPPO21/24. The attendees are listed below.

SDCC Attendees:

Ciara Shevlin (CS)	Planning
Gormla O' Corrain (GOC)	Planning
Aisling Kelly (AK)	Planning
Brian Harkin (BH)	Water Services
Graham Murphy (GM)	Roads
Suzanne Furlong (SF)	Parks
Asta Tamosaite (AT)	Housing

Design Team Attendees:

Patrica Thornton (PT)	Thornton O'Connor Planning
Zach Byrne (ZB)	Thornton O'Connor Planning
John Winslow (JW)	Donnelly Turpin Architects
Simon Carolan (SC)	Donnelly Turpin Architects
Sean O' Malley (SOM)	Griffin Landscape Architecture
Paul Burke (PB)	NRB Consulting Engineers
Ken Moriarty (KM)	Torque Consulting Engineers

In summary, during the PPC, the Design Team:

- Provided a brief introduction to the subject site, including its location, context, attributes and planning history; and
- Detailed the emerging design of the proposed development, outlining differences from outstanding SHD Application on-site regarding heights, massing, design principles, uses, car and cycle parking, key ratios and development management standard parameters.

The representatives of SDCC provided feedback in respect of a series of different matters. Key observations and considerations, which were deemed to require action or intervention, included the following:

- Plot Ratio (2.43) is on the higher end of what is acceptable, a future Application with a plot ratio of 2.43 could be accepted, subject to a strong justification for same.
- Noted that the LAP requires 30% 3-bed units, given the provision of 49 No. 'senior living' units, a detailed justification will be required for shortfall of this threshold.
- Underground attenuation should be avoided and attenuation at roof level via the proposed blue / green roofs is the preferred alternative.
- *Flood Risk Assessment* is required.
- Surface water needs to be integrated into landscaping / treatment train.

- A plan to maintain the aesthetic and uniformity of the hedgerows along east and west borders should be incorporated into the future proposal.
- Requested tree pits at ground level be included.
- Requested the loading bay be omitted from the proposed development as all servicing must take place within the development.
- Requested a full analysis of daylight and sunlight is submitted in any future proposal.

4.2 Section 32C LRD Meeting

A Section 32C LRD Meeting was held between representatives of SDCC and the Design Team on 28th April 2025 via Microsoft Teams. The Council assigned the SDCC Pre-Planning Ref. No. LRDOPoo2/25. The attendees are listed below.

SDCC Attendees:

Aisling Kelly	Planning
Darren Fagan	Planning
Brian Harkin	Water Services
Graham Murphy	Roads
Hannah Johnson	Public Realm
Edel O’Dempsey	Housing
Aine Ryan	Admin

Design Team Attendees:

Patricia Thornton	Thornton O’Connor Town Planning
Daniel Moody	Thornton O’Connor Town Planning
John Winslow	Donnelly Turpin Architects
Alfonso Santoni	Donnelly Turpin Architects
Ken Moriarty	Torque Consulting Engineers
Brian McMahon	NRB Consulting
Paul Burke	NRB Consulting
Sean O’Malley	Studio Glasú
Pablo Richie	Studio Glasú

Key issues raised during the LRD Meeting were compiled in the *LRD Opinion*, which was issued on 23rd May 2025. Therein were the principal matters to be addressed in the subject Planning Application. To avoid a duplication of text, we refer the Council to the enclosed report titled *Statement of Response to LRD Opinion* prepared by Thornton O’Connor Town Planning, wherein we summarise responses and direct the Council to relevant enclosures.

5.0 DESCRIPTION OF DEVELOPMENT

The following section describes the proposed development, and while it should principally be read in conjunction with the *Architectural Design Statement* prepared by DT, it should be reviewed alongside the full suite of materials submitted as part of the Planning Application submission.

5.1 Key Site and Development Statistics

Total Site Area	1.19 Ha (11,928 sq m)
Developable/Net Site Area	0.91 Ha (9,071 sq m)
No. Units	Total: 199 No Block A: Senior Living 49 No. Block B: 'Standard' 150 No.
Public Open Space	1,463 sq m (16.1% of net site area and 12.3% of gross site area)
Non-Residential Floor Area	2,123 sq m
Communal Open Space	1,701 sq m (Block A – Senior Living: 303 sq m (internal and external) and Block B – Residential: 1,398 sq m (external only))
Height	1–7 No. storeys
Plot Ratio (Based on Net Site Area)	2.4:1
Site Coverage	81.7%
No. of Car-Parking Spaces	58 No. (including 3 No. disabled spaces)
No. of Cycle-Parking Spaces	557 No. (Short-Stay: 412 and Long-Stay: 145)
Proposed Density per Hectare	243 dph
Proposed % of Dual Aspect Units	55%

Table 5.1: Key site and development statistics

Source: Collated by Thornton O'Connor Town Plannign (2025)

5.2 Built Form

The proposed development is principally comprised of 2 No. blocks, with Block A to the south and Block B to the north. The blocks are divided by a public plaza that runs through the site from east to west. The blocks range in height from 1 No. to 7 No. storeys.

Block A is principally 6 No. storeys, with a reduced central, linking area of 2 No. storeys and single-storey length at the south. As this block is located to the south of the site, this lower height middle section allows for increased sunlight to access the public plaza and the communal open space of Block B.

A similar approach to the stepping of the built-form is proposed for Block B, where the structure is reduced in height to 1 No. and 2 No. storeys centrally and at its southern frontage, again to allow sunlight into the communal podium, which is located at first floor level. Block B's principal height, in the residential cores of the building's perimeter are 6 No. and 7 No. storeys. The 7 No. storey elements are provided along its north and east frontages, while the 6 No. storey element is provided along its western frontage.

For both blocks, stepping and inseting is proposed to prevent excessively bulky and massed built-forms. This modulates and disaggregates the form in tandem with a fenestration strategy that is playful and varied.

Please see Figures 5.1 and 5.2 below for Computer-Generated Images (CGIs) which demonstrate the overall quality of the proposed development, and detail its height, massing and materiality.



Figure 5.1: CGI Aerial View of the Proposed Scheme

Source: 3D Design Bureau (2025)



Figure 5.2: CGI of the Proposed Development – View from the west

Source: 3D Design Bureau (2025)

5.3 Residential Use

A total of 199 No. residential apartments are proposed and have been designed in accordance with the Apartment Design Guidelines, with instruction supplemented by the Development Plan and Compact Settlement Guidelines. Of the 199 No. dwellings, 49 No. are 'senior living'²⁴ units (Block A) and 150 are 'standard' apartment units (Block B).

Block A consists of wholly senior living units, therefore, the proposed apartment sizes and layouts have been thoughtfully designed to cater to this demographic with universal design compliance. Block A comprises 23 No. 1-bed units and 26 No. 2-bed units, providing comfortable and accessible living spaces for residents.

Block B comprises standard residential units, with a carefully planned unit mix to accommodate a diverse range of household types and family sizes. Block B comprises 6 No. studios, 24 No. 1-bed units, 72 No. 2-bed units and 48 No. 3-bed units, providing a balanced selection of homes to meet the varying needs and lifestyles of future residents.

Dual and triple aspect units total 110 No. of the 199 No. proposed (equivalent to 55%). Further assessment and details are included in Section 7.0 below and the submitted architectural materials.

The mix of units in both blocks is set out in Table 5.1.

No. Beds	Studio	1-bed	2-bed	3-bed	Total
Block A – Senior Living	0	23	26	0	49
Mix	0%	47%	53%	0%	100%
Block B – Standard	6	24	72	48	150
Mix	4%	16%	48%	32%	100%
Total	6	47	98	48	199
Mix	3%	24%	49%	24%	100%

Table 5.1: Proposed dwelling mix

Source: Thornton O'Connor Town Planning (2025)

5.4 Non-Residential Uses

As a 'TC – Town Centre' zoned site, it is necessary and appropriate to propose a mix of uses in the proposed development. Therefore, in addition to the apartments, the Applicant also proposes non-residential uses, which are listed in Table 5.2 below.

These uses are generally 'local' in their intended range of services and offerings; consequently, they will be of benefit to the immediate community. They feature at the outer envelope of the ground floor level (although the crèche is at the mezzanine and first floor levels also), thereby activating the streetscape and increasing passive surveillance. They are further discussed in Section 7.0.

²⁴ Likely to be occupiable by at least 1 No. resident in each aged 55 No. years or older. The criteria will be confirming in the future Planning Application.

Unit	Use	Floor Area (sq m)
1	Dentist	72
2	Medical	210
3	Bicycle Repair and Sales	81
4	Class 1 / Class 2 Commercial	64
5	Off Licence	64
6	Retail	71
7	Bar	151
8	Class 1 / Class 2 Commercial	101
9	Café	87
10	Class 1 / Class 2 Commercial	89
11	Crèche	350
12	Pharmacy	195
13	Beauty/Health Salon	195
14	Retail	134
15	Class 1 / Class 2 Commercial	133
16	Retail	57
17	Retail	69

Table 5.2: Non-Residential Uses in the Proposed Development

Source: Donnelly Turpin Architects, collated by Thornton O'Connor Town Planning (2025)

5.5 Public Open Space

Public open space is provided by way of a piazza and link between Blocks A and B, measuring approximately 15–27 metres in width and over 70 metres in length, and accounting for a total area of 1,463 sq m. Small-to-mid-scale non-residential spaces line either side of the plaza to activate the realm and provide community and commercial offerings, with hard-surface materials demarcating routes through and within the space.

A 'mini square' or piazza is formed in the centre of the public open space with landscaped features, seating, play fixtures, etc. An art piece and unique lighting fittings will create character and enhance visual appearance.

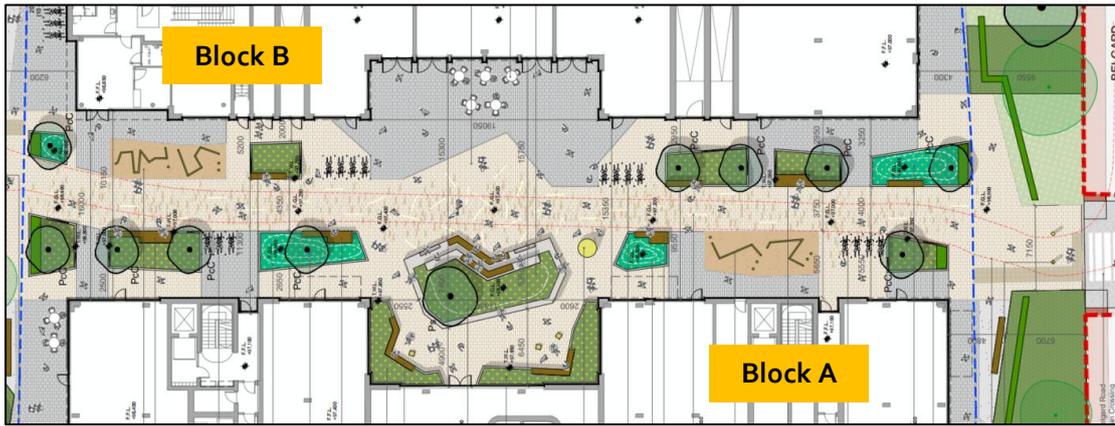


Figure 5.3: Proposed Public Open Space – Public Piazza and link through the Site

Source: Studio Glasú, annotated by Thornton O'Connor Town Planning (2025)



Figure 5.4: CGI of the Proposed Public Plaza at Ground Floor Level

Source: 3D Design Bureau (2025)



Figure 5.5: CGI of the Proposed Public Plaza at Ground Floor Level

Source: 3D Design Bureau (2025)

5.6 Other Aspects of Development

Further to the above primary elements of the development, the following aspects are also proposed:

- An undercroft car park, which provides 58 No. car parking spaces, 3 No. motorcycle parking spaces and 3 No. set-down bays accessed via a new entrance/exit at Belgard Square East;
- A gated service lane to the south of Block A, with entrances/exits off Belgard Square East and Belgard Road;
- 2 No. pedestrian/cycle crossings, at Belgard Square East and Belgard Road;
- 557 No. cycle parking space (412 No. long-stay and 145 No. short-stay);
- External community amenity space for the residents of standard apartment units (1,398 sq m) at podium level within Block B;
- Communal amenity spaces for the senior living units totalling 303 sq m, of which 114 sq m is internal, 139 sq m is at ground floor level accessed off the piazza and 50 sq m is on the southern side of Block A;
- 2 No. sub-stations;
- Plant/operational rooms;
- Bin stores;
- Public lighting;
- Blue roofs;
- PV arrays, lift overruns and rooftop opening vents atop both blocks;
- 4 No. 0.3 m diameter microwave link dishes mounted on 2 No. steel support poles affixed to the Block B lift overrun, all enclosed in radio-friendly GRP shrouds; and
- All associated works above and below ground.

6.0 STRATEGIC POLICY CONTEXT AND COMPLIANCE

The following Section provides an overview of strategic national and regional planning policy and the proposed development's compliance with same. However, please note that the more detailed planning assessment is contained in Section 7.0 below.

6.1 *Project Ireland 2040: National Planning Framework*

Project Ireland 2040: National Planning Framework is the Government's high-level overarching strategic plan that aims to shape the future growth and development of the country. It was published in February 2018 and has recently been revised under the *National Planning Framework First Revision (2025) (NPF)*, which was approved by the Houses of the Oireachtas on 30th April 2025 and, accordingly, has now come into effect.

Under the NPF, the Irish Government has set out long term strategic goals for the Republic of Ireland. These goals are geared towards compact growth and the sustainable development of Ireland to accommodate an increased population of one million people by the year 2040.

Section 2.2 of the NPF sets out an overview of the strategy which includes reference to 'Compact Growth' as follows:

- *"Targeting a greater proportion (40%) of future housing development to be **within the existing 'footprint' of built-up areas.**" [emphasis added]*
- *"**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.**" [emphasis added]*

Section 6.6 of the NPF further calculates that:

*"To meet projected population and economic growth as well as increased household formation, annual **housing output will need to increase to approximately 50,000 homes per annum in the years to 2040** and will be subject to monitoring and review."* [emphasis added]

To assist in the delivery of 50,000 additional homes annually, Section 6.6 of the NPF further states that Ireland's future homes will need to:

- *"**..be located in places that can support sustainable development** - places which support growth, innovation and the efficient provision of infrastructure, are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change;*
- ***be delivered in our cities and larger towns (where large scale housing demand exists), where homes and the appropriate supporting services can be delivered more efficiently and effectively at less cost to the State in the long-run, and***
- *still be located in our smaller towns, villages and rural areas, including the countryside, but at an appropriate scale that does not detract from the capacity of our larger towns and cities to deliver homes more sustainably."* [emphasis added]

The NPF augments the above, remarking:

“Well designed and located high and medium density housing will assist:

- *Fast-growing urban areas to achieve much needed scale;*
- *Medium-sized urban areas to find a route to quality in a new competitive framework;*
- *All urban areas to increase vibrancy and vitality;*
- *Increased efficiency and sustainability in the use of energy and public infrastructure.”*

The proposed development is a direct response to the national housing shortage that is readily reported and identified in recent planning policy. The proposed development is consistent with the principles set out throughout this Section as it provides a variety of dwelling sizes to meet the need for additional housing at a well-connected, well-served, infill site.

The NPF expressly seeks the densification of infill sites close to existing public transport and services and facilities such as at the subject site. National Policy Objective 45 states that it is an objective to:

“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.”

The NPF recognises that building inwards and upwards is important to effectively address the housing crisis in a more environmentally efficient and sustainable way. Therefore, it is contended that there is a significant importance placed in the NPF on developing high-quality accommodation by increasing the density of developments.

Thus, the NPF supports the delivery of the proposed development through increased density and height at the subject site, having regard to the design of the development which considers existing residential amenity, its proximity to public transport and local amenities, retail and commercial services and facilities.

Section 1.3 of the NPF identifies a list of 10 No. National Strategic Outcomes (NSOs), which define its vision. They are as follows:

1. Compact Growth;
2. Enhanced Regional Accessibility;
3. Strengthened Rural Economies and Communities;
4. High-Quality International Connectivity;
5. Sustainable Mobility;
6. A Strong Economy Supported by Enterprise, Innovation and Skills;
7. Enhanced Amenity and Heritage;
8. Transition to a Low Carbon and Climate Resilient Society;
9. Sustainable Management of Environmental Resources; and
10. Access to Quality Childcare, Education and Health Services.

A series of key National Policy Objectives (NPOs) are also defined by the NPF and are the more detailed means through which the NSOs will be achieved. NPO 74 states:

“Secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.”

Table 6.1 below sets out how the proposed development will contribute towards achieving the 10 No. NSOs identified in the NPF.

No.	National Strategic Outcome	How it is addressed by this development	Criteria met?
1	Compact Growth	Residential-led, mixed-use development at an infill site, increasing local densities and land-use intensities proximal to existing and proposed public transport, services, facilities and amenities.	Yes
2	Enhanced Regional Accessibility	Proximal to bus stops and the Luas Red Line towards Dublin City, enabling prompt onward connectivity to inter-city rail.	Yes
3	Strengthened Rural Economies and Communities	N/A	N/A
4	High-Quality International Connectivity	N/A	N/A
5	Sustainable Mobility	Ties into existing cycle and pedestrian infrastructure, creating new opportunities for pedestrian permeability through the site, with a range of services, facilities and amenities in the area, thereby promoting active modes. Located within a short walking distance to the Luas Red Line, frequent bus services and 3 No. proposed Spine BusConnects routes.	Yes
6	A Strong Economy Supported by Enterprise, Innovation and Skills	The mixed-use aspect of the scheme will generate employment through the provision of retail and commercial units, in addition to numerous other uses, such as a café, a bar, a pharmacy and a dental practice.	Yes
7	Enhanced Amenity and Heritage	The public plaza will not only provide public open space but an opportunity for a variety of uses, such as markets, art exhibitions and live music performances. A crèche, with an external play area, and internal communal amenity space for the senior living units are also proposed.	Yes
8	Transition to a Low Carbon and	Low car parking and high cycle parking provision will encourage active mode and public transport use.	Yes

No.	National Strategic Outcome	How it is addressed by this development	Criteria met?
	Climate Resilient Society	Sustainable renewable energy sources are proposed. A target for an A-rated development (BER) is sought.	
9	Sustainable Management of Environmental Resources	Materials will be carefully selected to minimise resources, and where appropriate (in accordance with the RWMP), demolition waste will be repurposed.	Yes
10	Access to Quality Childcare, Education and Health Services	A crèche is proposed to cater for the childcare demand generated by the proposed development, with the <i>Social Infrastructure Audit</i> confirming the adequacy of education, healthcare and other services in the wider area.	Yes

Table 6.1: Compliance with the NPF's NSOs.

Source: *National Planning Framework First Revision (2025) and Thornton O'Connor Town Planning (2025)*

The above NSOs are supplemented by NPOs, with some of those of relevance to the proposed development outlined below:

NPO 4 – *"A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs."*

NPO 7 – *"Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth."*

NPO 8 – *"Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth."*

NPO 10 – *"Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth."*

NPO 12 – *"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."*

NPO 13 – *"Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity."*

NPO 14 – *"Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals."*

NPO 20 – *"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."*

NPO 22 – *"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."*

NPO 37 – *"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."*

NPO 38 – *"Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services."*

NPO 43 – *"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."*

NPO 44 – *"Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time."*

NPO 45 – *"Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development."*

The development proposed herein is wholly supported by, and supportive of, the foregoing NPOs. As a higher density development of residential units, including 'senior living' units, crèche and variety of commercial and retail uses, it seeks to sustainably and efficiently use this infill site within the existing built footprint of Dublin City. It integrates with established and proposed public transport and the existing range of local services, facilities and amenities.

6.2 Urban Development and Building Heights – Guidelines for Planning Authorities

The *Urban Development and Building Heights: Guidelines for Planning Authorities* (2018) (Height Guidelines) established a series of national rules in relation to building heights and new developments. The Height Guidelines were prepared to work in concert with the objectives of the NPF and other national Guidelines for the delivery of sustainable development and compact growth.

The Guidelines are intended to set a more proactive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards. The Guidelines note that increasing prevailing building heights has a critical role to play in addressing the delivery of more compact growth in urban areas, particularly cities and large towns by enhancing both the scale and density of development. Accordingly, the planning process must actively address how this objective will be secured.

The Guidelines remark that:

"...it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility."

The Height Guidelines are explicit in their consideration of prevailing heights of development, stressing that such heights should **not** dictate/constrain the scale of new development, but that they should still be respected.

Under Specific Planning Policy Requirement (SPPR) 1, Planning Authorities are required to avoid the application of blanket height restrictions, but through the plan-making process, identify areas where increases in height can be pursued:

"In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height."

In response to SPPR 1, the *South Dublin County Development Plan 2022–2028* (Development Plan) is accompanied by *South Dublin County's Building Height and Density Guide* (Appendix 10). Whilst we note the content of this document, we are of the opinion that the Tallaght Town Centre LAP is of most relevance to the subject site.

Note that SPPRs 2, 3 and 4 do not apply to the proposed development:

- SPPR 2 – Relates to the role of planning authorities achieving greater heights and mixed-use development and mechanisms to achieve same;
- SPPR 3 – Relates to developments that do not comply with the specific objectives of the relevant development plan or local area plan, however, as detailed in Section 7.3.2, the height of the proposed development is considered to be in accordance with the relevant local area plan; and
- SPPR 4 – Relates to planning at greenfield and edge of settlement locations, yet the subject site is an infill, brownfield regeneration site.

Ultimately, we refer the Council to Section 7.3.2 below where building height is discussed in greater detail.

6.3 Planning Design Standards for Apartments: Guidelines for Planning Authorities

The updated *Planning Design Standards for Apartments: Guidelines for Planning Authorities* (Apartment Design Guidelines) were published in July 2025. The Apartment Design Guidelines define the preferred locations for apartment developments to encourage higher densities and consolidated residential development, and the development management standards to which they should be designed.

The Apartment Design Guidelines prescribe a series of SPPRs which apartment developments must comply, although with dispensations in some instances. The SPPRs of relevance to the proposed development are identified and responded to in Table 6.2 below. Note that SPPRs 6, 7 and 8 do not apply to this specific development type.

SPPR No.	Requirement	Response/ Compliance
1	<p>(A) <i>With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.</i></p> <p>(B) <i>Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.</i></p>	Refer to Section 7.5 below for full details.
2	<p><i>The following minimum apartment floor areas shall apply and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:</i></p> <ul style="list-style-type: none"> • <i>Studio apartment (1 person) 32 sq.m</i> • <i>1-bedroom apartment (2 persons) 45 sq.m</i> • <i>2-bedroom apartment (3 persons) 63 sq.m</i> • <i>2-bedroom apartment (4 persons) 73 sq.m</i> • <i>3-bedroom apartment (4 persons) 76 sq. m</i> • <i>3-bedroom apartment (5 persons) 90 sq.m</i> <p><i>The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.</i></p>	Refer to Section 7.6.1 below for full details. Please also refer to DT's <i>Architectural Design Statement</i> and appended schedules therein.
3	<p><i>In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</i></p> <p>(i) <i>A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.</i></p>	<p>A total of 109 No. units (55%) are dual thereby complying with this SPPR.</p> <p>Refer to Section 7.6.4 below for further details.</p>

SPPR No.	Requirement	Response/ Compliance
	(ii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.	
4	Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.	No ground floor apartments are proposed. Therefore, this SPPR does not apply.
5	There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.	This is noted. Please refer to Section 7.6.5 below for full details.

Table 6.2: Evidence of compliance with the relevant SPPRs of the Apartment Design Guidelines

Source: *Planning Design Standards for Apartments Guidelines for Planning Authorities (2025)* and *Thornton O'Connor Town Planning (2025)*

In addition to the above SPPRs, the Apartment Design Guidelines set supplementary guidance and various minimum areas within units (e.g. storage) and requirements (e.g. communal amenity space). The proposed development complies with these requirements, as relevant and applicable, and this is detailed in the Sections of this Report below and the materials prepared and submitted by the other members of the Design Team.

6.4 Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities

Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (Compact Settlements Guidelines) were adopted in January 2024, replacing *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (2009). Their purpose is to promote and accommodate more sustainable development (residential in particular); setting density standards and a suite of design requirements, such as those relating to parking and public open space.

As with the Apartment Design Guidelines, the Compact Settlements Guidelines define a suite of SPPRs, as well as a series of 'Policies and Objectives'. The rest of this Sub-Section lists these and provides brief responses to demonstrate the proposed development's compliance with same (Tables 6.3 and 6.4). Note that SPPR 2 does not apply to this scheme as it relates to private amenity space requirements for house unit types, none of which are proposed as part of this development.

Specific Planning Policy Requirements

SPPR No.	Requirement	Response/ Compliance
1	<p>Separation Distances</p> <p><i>It is a specific planning policy requirement of these Guidelines that statutory development plans* shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms** at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.</i></p> <p><i>There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.</i></p> <p><i>In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.</i></p> <p><i>This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."</i></p> <p><i>* "Any reference to a statutory development plan(s) in these Guidelines refers to all development plans made under the Planning and Development Act 2000 (as amended) or under any replacement Planning and Development Act, including local area plans and strategic development zones planning schemes.</i></p> <p><i>** "Refer to definition in Appendix A: Glossary of Terms." The Appendix defines this as "Primary living spaces such as living rooms, dining rooms, studies and bedrooms.</i></p>	<p>Please see the detailed discussion in Section 7.7 below.</p>
3	<p>Car Parking</p> <p><i>It is a specific planning policy requirement of these Guidelines that:</i></p> <p><i>(i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for</i></p>	<p>Please see the detailed discussion in Section 7.11.1 below.</p>

SPPR No.	Requirement	Response/ Compliance
	<p><i>residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.</i></p> <p><i>(ii) In accessible locations, defined in Chapter 3 (Table 3.8) car-parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.</i></p> <p><i>(iii) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling.</i></p> <p><i>Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.</i></p> <p><i>This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.</i></p>	
4	<p>Cycle Parking and Storage</p> <p><i>It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.</i></p> <p><i>The following requirements for cycle parking and storage are recommended:</i></p> <p><i>(i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.</i></p>	<p>Please see Section 7.11.2 below for details of the calculated cycle parking requirement, as well as the quantum and location of those spaces proposed for provision.</p>

SPPR No.	Requirement	Response/ Compliance
	<p>(ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.</p>	

Table 6.3: SPPRs and compliance with same

Source: *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024)* and Thornton O'Connor Town Planning (2025)

Policies and Objectives

P&O No.	Requirement	Response/ Compliance
3.1	<p>Densities</p> <p><i>It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate."</i></p> <p>We contend that the site falls within the category of a 'City – Urban Neighbourhood', per the definition in its Table 3.1 as it falls within the (i), (ii) and (iii) criteria:</p> <p><i>"The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork."</i></p>	<p>Based on the guidance and methodology contained in the Guidelines, a density of 243 dph is proposed. This falls within the range for this location.</p> <p>Refer to Section 7.4 below for full details.</p>
4.1	<p>DMURS</p> <p><i>It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking.</i></p>	<p>Please refer to the <i>DMURS Statement of Consistency</i> prepared by NRB in respect of this Policy and Objective.</p>

P&O No.	Requirement	Response/ Compliance
4.2	<p>Quality Urban Design and Placemaking</p> <p><i>"It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications."</i></p> <p>The "key indicators of quality urban design and placemaking" set out in Section 4.4 of the Guidelines fall under the headings of:</p> <p>"Sustainable and Efficient Movement"</p> <p><i>"Ensuring places are well connected and accessible by sustainable modes. Also acknowledging that quality of journey is equally important and that places are perceived as safe and are not dominated cars."</i></p> <p>"Mix and Distribution of Uses"</p> <p><i>"Promoting the integration of land uses and transportation and a diverse and innovative mix of housing that can facilitate compact housing and provide greater housing choice."</i></p> <p>"Green and Blue Infrastructure"</p> <p><i>"Placing and [sic] emphasis on the protection of natural assets and biodiversity, whilst also taking a more strategic view as to how open space networks are formed to balance the needs of communities."</i></p> <p>"Responsive Built Form"</p> <p><i>"Placing an emphasis on the creation of a coherent urban structure and design approach that responds to local character and is attractive."</i></p>	<p>Please refer to the Architectural Design Statement prepared by DT in respect of this Policy and Objective.</p>
5.1	<p>Public Open Space</p> <p><i>It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.</i></p>	<p>Public open space of 1,463 sq m and equivalent to 16.1% of the net site area is proposed, in accordance with the Development Plan and this SPPR.</p> <p>Refer to Section 7.8.1</p>

P&O No.	Requirement	Response/ Compliance
	<p><i>In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.</i></p> <p><i>In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.</i></p> <p><i>In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site.</i></p>	<p>below for full details.</p>

Table 6.4: Policies and objectives and compliance with same

Source: *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024)* and *Thornton O'Connor Town Planning (2025)*

6.5 **The Planning System and Flood Risk Management: Guidelines for Planning Authorities**

The Planning System and Flood Risk Management: Guidelines for Planning Authorities (2009) provide detailed guidance for Planning Authorities when preparing their statutory plans and competent authorities when assessing Planning Applications. Their objectives are stated as being to:

- *"Avoid inappropriate development in areas at risk of flooding;*
- *Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;*
- *Ensure effective management of residual risks for development permitted in floodplains;*
- *Avoid unnecessary restriction of national, regional or local economic and social growth;*
- *Improve the understanding of flood risk among relevant stakeholders; and*
- *Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management."*

The *Flood Risk Assessment Report* prepared by Torque is included in this Planning Application pack and positively concludes the following:

- *"A summary of the level of service was provided with a review of the office of public works flood maps indicating that the subject site does not occur within any previous instances regarding flooding.*
- *The subject site is not required to be reviewed under South Dublin City County Council requirement for a justification test and is deemed to be in compliance with their county development plan (2022-2028) flood risk strategy requirements.*
- *The subject site falls outside the 0.1% AEP fluvial, pluvial and coastal flood zone which thus indicates the subject site can be classified as Zone C (low probability of flooding).*
- *The subject site falls within a moderate area of vulnerability for groundwater flooding and overlays an existing gravel aquifer.*
- *The stormwater drainage system has been designed to account for climate change and exceedance flows. The implications of pipe blockages have been examined and have been modelled accordingly."*

6.6 **Design Manual for Urban Roads and Streets**

The proposed development has been designed in accordance with the principles of the *Design Manual for Urban Roads and Streets* (2019) (DMURS), which prioritises active and public modes of transport over the use of the private car, seeks to create safer and more accessible environments, and supports the integration of transport infrastructure and land-uses.

For details of the proposed development's compliance with DMURS, please refer to the enclosed drawings and reports prepared by NRB. Of note is the *DMURS Statement of Consistency*, which provides key insights.

6.7 *Childcare Facilities: Guidelines for Planning Authorities*

National guidance with respect to Childcare Facilities is principally contained in the *Childcare Facilities: Guidelines for Planning Authorities* (2001) (Childcare Facilities Guidelines). They were drafted to provide Planning Authorities and Developers with guidance in relation to the provision of Childcare Facilities, in terms of their location, scale and design.

We note that these Guidelines are now dated, and have been supplemented by guidance contained in the Apartment Design Guidelines and the *Child Care Act 1991 (Early Years Services) Regulations 2016*.

In relation to the extent of provision, the Childcare Facilities Guidelines state that 1 No. Childcare Facility should be provided for larger residential developments unless there are genuine reasons to the contrary:

*"Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary for example, development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments. For new housing areas, an average of one childcare facility for each 75 dwellings would be appropriate. **The threshold for provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas.** Authorities could consider requiring the provision of larger units catering for up to 30/40 children in areas of major residential development on the basis that such a large facility might be able to offer a variety of services – sessional/drop in/after-school, etc."*

The provision of childcare facilities is further elaborated in Section 3.3.1 of the Guidelines, which states that "a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate" for residential developments. The Guidelines additionally provide information on, *inter alia*: (i) minimum clear floor area and (ii) operational / management requirements.

Based on the guidance above and that provided in the more contemporary Apartment Design Guidelines, it is necessary to determine if, and to what extent, childcare requirements exist on a case-by-case, project-by-project basis. For this project, the childcare requirement of 40 No. places was calculated using the 20:75 rate of provision and based on 150 No. units²⁵.

However, in the analysis undertaken in the *Social Infrastructure Audit* prepared by Thornton O'Connor Town Planning (enclosed under separate cover), it was determined that estimated demand for childcare places would be limited to approximately 7.7 No.. We note that the proposed crèche, based on its floor area of 350 sq m will have capacity for approximately 70 No. children.

For further insights, please refer to the *Social Infrastructure Audit*.

²⁵ This excludes/omits all of the senior living units, as they are not expected to accommodate children requiring childcare.

6.8 **Part V of the Planning and Development Act**

Part V of the Planning and Development Act: Guidelines issued by the Minister for Housing, Planning, Community and Local Government details the application of Part V of the *Planning and Development Act 2000* (as amended) and provides instruction on how to achieve the delivery of social housing as part of residential schemes.

To comply with the Part V requirements of the *Planning and Development Act 2000* (as amended), we firstly note that the subject site was purchased on 19th February 2021 (see enclosed letter). Therefore, the 10% Part V contribution applies. Consequently, a total of 20 No. units (10%) are proposed to for provision. These include 10 No. 1-bed and 10 No. 2-bed units.

Please also refer to the *Proposed Part V Units* drawing prepared by DT and the costings in the *Part V Proposal* document prepared by MMP.

6.9 **Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities**

The undertaking of Appropriate Assessment is to ensure the protection and integrity of statutorily protected environments/sites. These sites are protected by the Birds Directive (2009/147/EC (as amended)) and the Habitats Directive (1992/43/EEC (as amended)), and by Natura 2000. In Ireland, such areas are identified as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Appropriate Assessment, as set out in the *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities* (2009), is "an impact assessment process that fits within the decision-making framework", albeit "the requirement [to undertake Appropriate Assessment] is not to prove what the impacts and effects will be[, if any], but rather to establish beyond reasonable scientific doubt that adverse effects on site integrity will not result".

As shown in Figure 6.2, there are 4 No. principal stages to Appropriate Assessment. For the mixed-use development proposed on the subject site, the enclosed *Appropriate Assessment Screening Report* (prepared by DNV) screened out, at Stage 1, that the proposal would have "adverse effects" on the integrity of Natura 2000 sites.

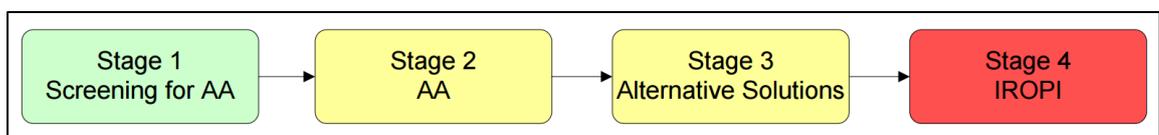


Figure 6.1: The 4 No. Stages of the Appropriate Assessment Process

(Source: *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities* (2009))

With respect to effects on protected Natura 2000 sites, the enclosed report concluded the following:

"The Proposed Development on lands at Belgard Square East, Belgard Road and Old Blessington Road, Tallaght, Dublin 24, has been assessed considering:

- *The nature, size and location of the Proposed Development and possible impacts arising from the Construction and/or Operational Phase.*
- *The QIs/SCIs and conservation objectives of the European sites.*
- *The potential for in-combination effects arising from other plans and projects.*

In carrying out this AA screening, ecology specific mitigation measures have not been accounted for. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been considered.

*In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:*

- *North Dublin Bay SAC (000206).*
- *South Dublin Bay SAC (000210).*
- *South Dublin Bay and River Tolka Estuary SPA (004024).*
- *North Bull Island SPA (004006).*
- *North-West Irish Sea SPA (004236).*

In carrying out this AA screening, mitigation measures have not been taken into account. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.

On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above-listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites' conservation objectives. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of an NIS is not required." [emphasis original]

6.10 Housing Options for Our Ageing Population: Policy Statement

Published in 2019, the *Housing Options for Our Ageing Population: Policy Statement* (Housing Options) provides a framework by which the Government can facilitate and promote a variety of housing choices, including housing with care / supported housing for older people. Housing Options sets out the principles shown in the extract presented in Figure 6.2, which will underpin the definition of different houses typologies and allowing for residential transitions as we age.



Figure 6.2: Housing for our Ageing Population Principles

(Source: The Department of Housing, Planning and Local Government and the Department of Health (2019), *Housing Options for Our Ageing Population: Policy Statement*)

The principles of relevance to the proposed development are outlined below.

1. Ageing in Place

"To best facilitate social interaction and to provide appropriate support for our older people, housing should be located close to amenities and services to enhance their general independence. Developments and neighbourhoods should incorporate a mix of dwelling type, size and tenure to support sound social and environmental policy objectives. These factors contribute to an improved quality of life and are therefore more successful in terms of residents' satisfaction and long tenure."

2. Supporting Urban Renewal

"Actively supporting the renewal and regeneration of our towns, villages and urban centres is a key Government priority as articulated in Project Ireland 2040. [...] Quality of placemaking is not limited to buildings but about making our streets and urban spaces attractive, accessible and safe. It is also about supporting the development of housing and services on centrally located sites within the urban area. The development of good quality, well connected, urban centres with a range and choice of housing tenures and types actively supports ageing in place."

3. Promoting Sustainable Lifetime Housing

"Lifetime communities are key to achieving sustainable environments across the life course. The ambition will be guided by Universal Design principles in so far as practicable, whilst maintaining the domestic scale."

4. Staying Socially Connected

"The importance of social interventions and interaction is vital in ensuring that the ageing population is adequately cared for and supported. Social interventions are centred around a person centric model of care where tailored care and support services meet the needs of the individual. Social supports can substantially increase a person's quality of life. A person centric approach is essential to ensure a good standard of living for older people and this should be a key consideration in choosing a home that will best meet the person's needs. Furthermore, the importance of a sense of community should not be underestimated."

The proposed development's senior living dwellings are wholly supportive of and supported by Housing Options. It will deliver 49 No. dwellings intended for older persons in an established urban location, thereby complying with the principle of ageing in place, as residents can right-size and transition within their community. Here, they can remain socially connected and forge new relationships, whilst still being able to avail of the full range of resources and services in Tallaght. The dwellings' provision also has a notable role in urban renewal, by regenerating a wholly underutilised town centre zoned site.

6.11 Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019–2031

The *Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019–2031* (RSES) was published on 26th June 2019. Contained within this regional planning document are Regional Policy Objectives (RPOs) which are intended to contribute to the sustainable planning and development of the Eastern and Midlands Region over the life of the Strategy to 2031, although with a vision to 2040. Many of the RSES's RPOs complement those of the NPF with respect to the sustainable growth and consolidated development of the region. The Regional Strategic Outcomes (RSOs) – which the RPOs seek to attain – are summarised in Figure 6.4.

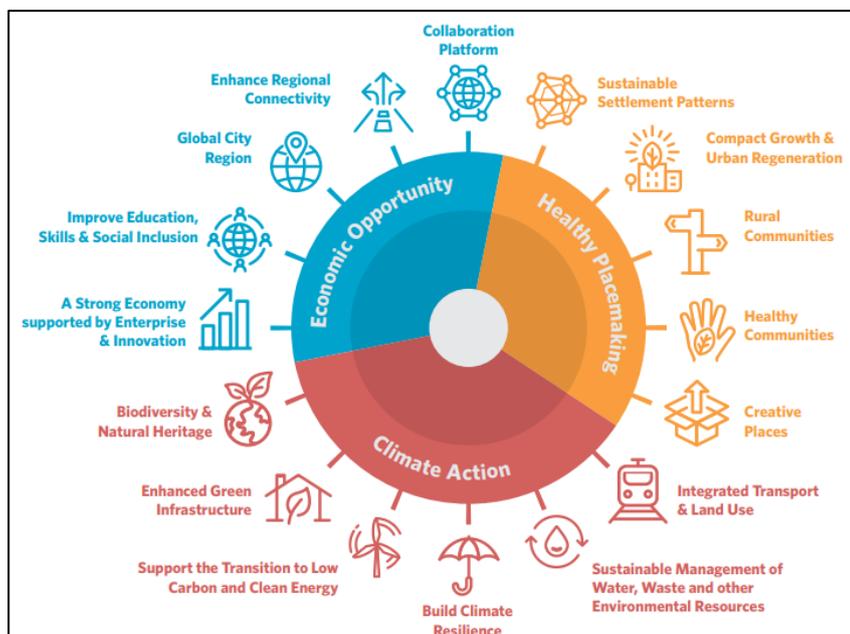


Figure 6.3: Regional Strategic Outcomes of the RSES

Source: *Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly* (2019)

There are 16 No. RSOs which facilitate the implementation of NPF policy objectives. Of importance to the proposed development are the following:

RSO No. 1 (Sustainable Settlement Patterns) – *“Better manage the sustainable and compact growth of Dublin as a city of international scale and develop Athlone, Dundalk, Drogheda and a number of key complementary growth settlements of sufficient scale to be drivers of regional growth. (NSO 1, 7, 10)”*

RSO No. 2 (Compact Growth and Urban Regeneration) – *“Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region’s citizens. (NSO 1).”*

RSO No. 4 (Healthy Communities) – *“Protect and enhance the quality of our built and natural environment to support active lifestyles including walking and cycling, ensure clean air and water for all and quality healthcare and services that support human health. (NSO 10)”*

RSO No. 5 (Create Places) – *“Enhance, integrate and protect our arts, culture and heritage assets to promote creative places and heritage led regeneration. (NSO 5, 7)”*

RSO No. 6 (Integrated Transport and Land Use) – *“Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning. (NSO 2, 6, 8,9)”*

RSO No. 7 (Sustainable Management of Water, Waste and Other Environmental Resources) – *“Conserve and enhance our water resources to ensure clean water supply, adequate waste water treatment and greater resource efficiency to realise the benefits of the circular economy. (NSO 8, 9)”*

RSO No. 8 (Build Climate Resilience) – *“Ensure the long-term management of flood risk and build resilience to increased risks of extreme weather events, changes in sea level and patterns of coastal erosion to protect property, critical infrastructure and food security in the Region. (NSO 8, 9)”*

RSO No. 9 (Support the Transition to Low Carbon and Clean Energy) – *“Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050. (NSO 8, 9)”*

RSO No. 10 (Enhanced Green Infrastructure) – *“Identify, protect and enhance Green Infrastructure and ecosystem services in the Region and promote the sustainable management of strategic natural assets such as our coastlines, farmlands, peatlands, uplands woodlands and wetlands. (NSO 8, 9)”*

RSO No. 11 (Biodiversity and Natural Heritage) – *“Promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection. (NSO 7, 8)”*

The proposed development aligns with these RSOs by the creation of a more sustainable, dense, compact and connected urban area, tying into both existing and proposed public transport and delivering an appropriate mix of uses. Ultimately, the development complements and supports the Spatial Strategy of the RSES, which:

"...combines the growth of Dublin and regional centres with a selected number of large self-sustaining settlements that have the assets and capacity to grow in a sustainable manner while minimising impacts on the receiving environment. This option offers the best opportunity to align services with population and economic growth, promote compact growth in urban settlements and make the best use of infrastructure including public transport thereby reducing transport emissions and improve regional accessibility."

Urban regeneration and infill sites – such as the subject site – can contribute to sustainable compact growth and revitalisation of existing settlements of all scales. This will help to address the previously referenced NPOs 4, 7 and 8 of the NPF, which target the delivery of new homes within the footprint of existing settlements.

Within the RSES, there are also compact growth targets and growth enablers for the Dublin City and Metropolitan Areas, which comprise "**...at least 50% of all new homes to be built, to be within or contiguous to the existing built-up area of Dublin city and suburbs and a target of at least 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life.**" **[emphasis added]**

The development of the underutilised subject site will ensure that an appropriately dense and designed development is delivered in close proximity to high-quality public transport. The provision of a range of studio and 1-, 2- and 3-bed apartments, will provide a broad choice of housing options and cater for the needs of a variety of different individuals and households. These will be complemented by the crèche and various commercial and retail units, aligning with the principles of the '15-minute city' concept.

7.0 LOCAL PLANNING POLICY CONTEXT

The purpose of this section is to detail the relevant policies and objectives applicable in relation to the proposed development on the subject site. The Development Plan and the LAP are the statutory plans for the area and guide development relating to the subject site.

7.1 Land Use Zoning

As shown in Figure 7.1 below, the subject site is zoned 'TC – Town Centre' in the Development Plan where the stated objective is to *"To protect, improve and provide for the future development of the Town Centres."*

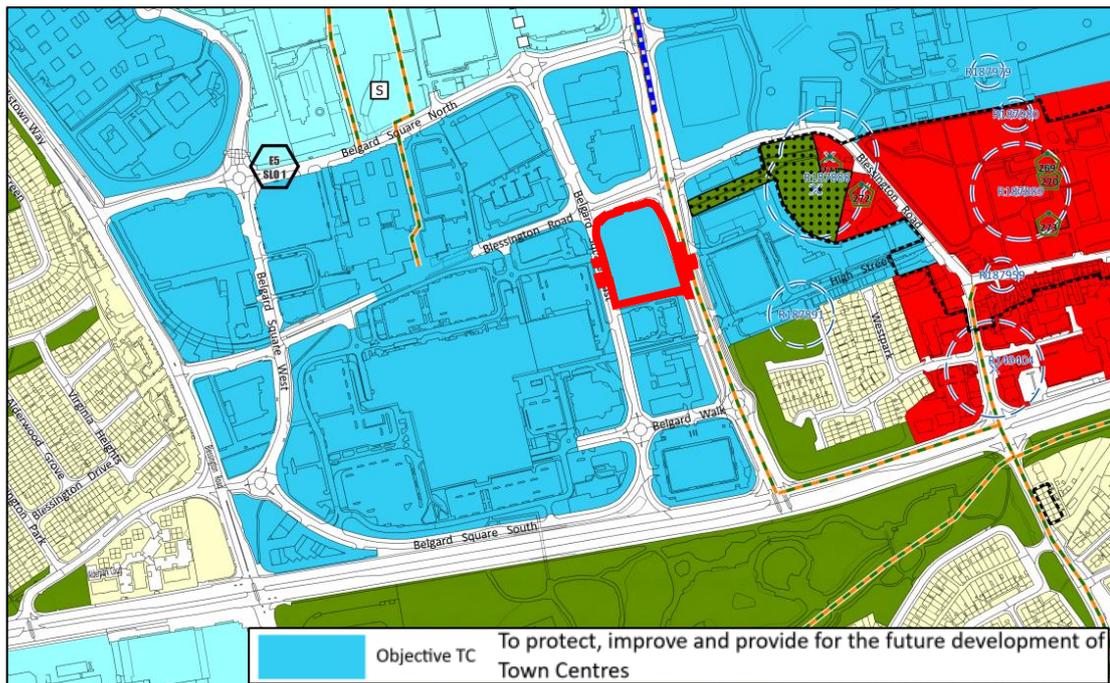


Figure 7.1: Zoning Map No. 9, Subject Sites (Outlined Indicatively in Red) Zoned TC

Source: Extract from *South Dublin County Development Plan 2022–2028 Zoning Map 9, Annotated by Thornton O'Connor Town Planning, 2024*

Table 12.5 of the Development Plan outlines the uses considered to be 'Permitted in Principle'. These are summarised below in Table 7.1.

Permitted in Principle	Advertisements and Advertising Structures, Bed & Breakfast, Betting Office , Car park, Childcare Facilities , Community Centre, Conference Centre, Crematorium, Cultural Use, Doctor / Dentist , Education, Embassy, Enterprise Centre, Funeral Home, Garden Centre, Guest House, Health Centre , Home Based Economic Activities, Hospital, Hotel / Hostel, Housing for Older People , Industry-Light, Live-Work Units, Nightclub, Nursing Home, Office-Based Industry, Offices less than 100 sq m, Offices 100 sq m-1,000 sq m, Offices over 1,000 sq m, Off-Licence, Open Space , Petrol Station, Place of Worship, Primary Health Care Centre, Public House , Public Services, Recreational Facility, Residential , Residential Institution, Restaurant / Café , Retail Warehouse, Retirement Home, Shop Local , Shop-Major Sales Outlet,
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	Shop-Neighbourhood, Sports Club / Facility, Stadium, Social Club, Veterinary Surgery, Work-Live Units
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Table 7.1: 'Permitted in Principle' uses on TC-zoned lands per the Development Plan

Source: *South Dublin County Development Plan 2022–2028*

The TC zoning of Tallaght Town Centre reflects its Level 2 retail designation in the EMRA's regional retail hierarchy. This area is encouraged to deliver retail services, but also a range of other uses "...to create a vibrant living place", according to Table 9.1 of the Development Plan. This approach is espoused in the Plan as the '15-minute city' model, which is the optimal planning and development strategy as it integrates 'living, working and playing', supports community development and creates the critical mass needed to sustain local businesses and services. It is a markedly more efficient use of land and transport infrastructure by avoiding the development of mono-use areas that cannot be sustainably served.

As Figure 7.2 illustrates, the subject site falls within the 'Core Retail Area' and is specifically identified as a 'Retail Opportunity Site', per the Development Plan. With respect to the subject site, the Development Plan includes EDEg Objective 5:

"To promote and encourage the development and redevelopment, to a high standard of urban design, of the identified Retail Opportunity Sites at, and adjacent to, the Square Shopping Centre and mixed use / retail opportunity at the former Woodies site on the Belgard Road." [emphasis added]

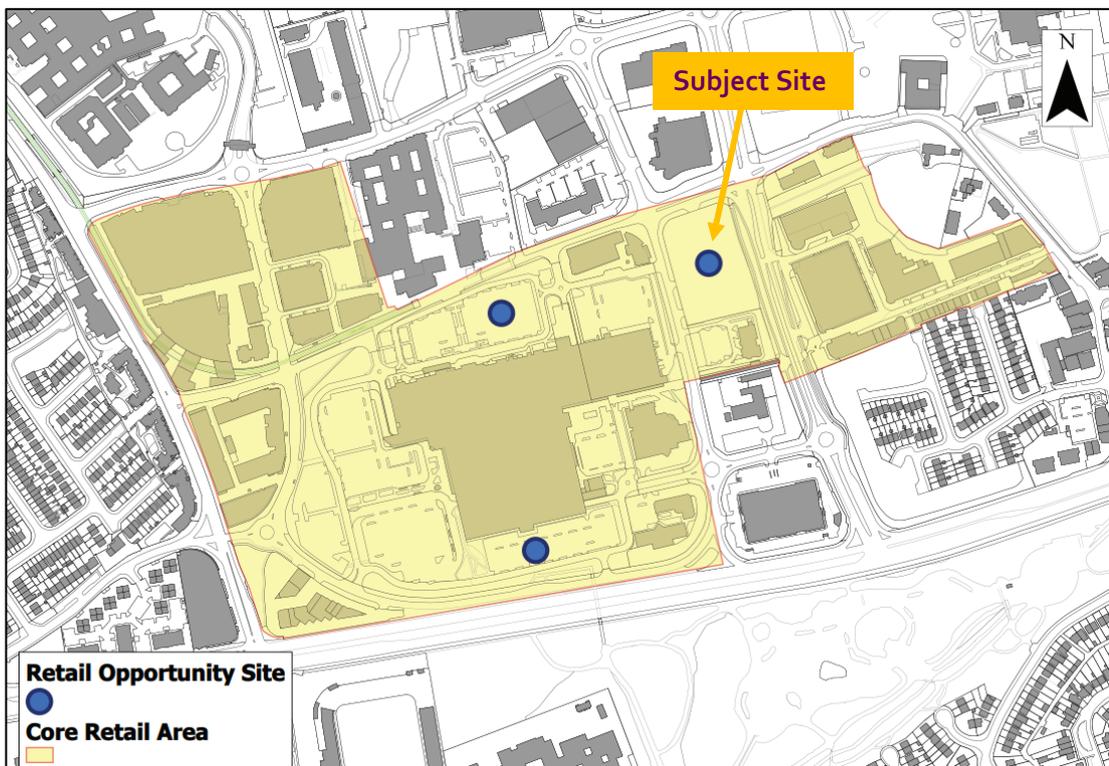


Figure 7.2: Subject Site Identified within the Tallaght Core Retail Area and as an Opportunity Site

Source: *South Dublin County Development Plan 2022–2028, Annotated by Thornton O'Connor Town Planning 2025*

In the above context, we consider it worth recognising Objective ED12 of the LAP, which seeks the delivery of a broad mix of uses within the Core Retail Area:

"Tallaght is a major Town Centre, at the top of the County's urban hierarchy and it is the policy of the Council to promote Tallaght Town Centre as the primary urban centre in the County by directing higher order retail and retail services, residential, cultural, leisure, financial, public administration, restaurants/ bars, entertainment and civic uses into and adjoining the Core Retail Area of this centre."

We firmly contend that the proposed development accords with the site's TC zoning designation and expectation of the Development Plan in relation to mixed and retail uses. In Table 7.2 below, we set the proposed uses against the corresponding 'permitted use', defined by the Development Plan.

Proposed Use	Corresponding Permitted Use
Dwellings	Residential
Retail Units	Shop Local, Shop-Neighbourhood
Class 1 / Class 2 Commercial Units	See discussion below
Bicycle Sales and Repair	Shop Local, Shop-Neighbourhood
Off-Licence	Off-Licence
Bar	Public House
Café	Restaurant / Café
Medical Centre	Doctor / Dentist, Health Centre
Dental Practice	Doctor / Dentist, Health Centre
Pharmacy	Shop Local, Shop-Neighbourhood
Beauty/Health Salon	<i>Sui generis</i> , see discussion below
Crèche	Childcare Facilities

Table 7.2: Proposed uses and corresponding permitted uses

Source: *South Dublin County Development Plan 2022–2028 and Thornton O'Connor Town Planning (2025)*

With respect to the Class 1 / Class commercial units, these have been proposed to maximise their potential flexibility in the future, especially as the development already proposed 4 No. retail units. Their legislative definitions can be summarised as:

- **Class 1** – Shop.
- **Class 2** – Financial services, professional services (other than health or medical services) and any other services (including betting office), where the services are provided principally to visiting members of the public.

The beauty/health salon is *sui generis*, as the Development Plan does not include a use class against which it aligns, although it could technically fit into the above Class 2 definition (as long as it is not a strict health/medical service being provided). However, the Applicant and Design Team have opted to be specific to provide greater certainty for the Council and potential occupiers alike. Potential businesses to occupy it include a nail salon, a barber, a hairdresser or a spa.

Evidently, the proposed development will "*protect, improve and provide for*" town centre uses that support the creation of vibrant, mixed-use areas. Additional housing will introduce all-day vitality and spending capacity, the commercial uses will generate employment and

economic activity, and the crèche, dental practice and medical clinic will enhance local social and community services.

7.2 Relevant Policies and Objectives for Infill and Mixed-Use Development on Underutilised Sites

Both the Development Plan and the LAP highlight the need to make better use of underutilised sites located within the existing built-up urban footprint and how the redevelopment or repurposing of vacant commercial properties or brownfield sites can provide much needed high-quality housing. The development of underutilised sites can result in additional housing typologies and sizes in the area and increase the vibrancy of towns and villages.

In this regard, the following policies and objectives of the Development Plan are of most relevance:

Policy CS6: Settlement Strategy – Strategic Planning Principles –

"Promote the consolidation and sustainable intensification of development within the urban settlements identified in the settlement hierarchy."

CS6 Objective 2 –

"To promote compact growth and to support high quality infill development in existing urban built-up areas by achieving a target of at least 50% of all new homes to be located within or contiguous to the built-up area of Dublin City and Suburbs (consistent with NSO 1, RSO 2, NPO 3b and RPO 3.2)."

Policy CS7: Consolidation Areas within the Dublin City and Suburbs Settlement –

"Promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary."

CS7 Objective 3 –

"To promote and support the development of undeveloped infill and brownfield zoned lands and to promote pre-application consultation in accordance with Section 247 of the Planning and Development Act, 2000 (as amended) (consistent with RPO 4.3)."

CS9 Objective 2 –

"To support well designed infill and brownfield development on zoned lands along the main street, in particular where it provides for improved services, commercial, retail or mixed-use provision to meet the needs of the growing population."

QDP1 Objective 5 –

"To promote the re-development of underutilised Local Centres within the County as new mixed use neighbourhood hubs continuing to provide for local retail and services in a manner which respects and consolidates the existing urban character of these areas"

ensuring adherence to the eight key design principles in 'The Plan Approach' including quality of design, integration, accessibility and connections to the surrounding areas."

The following objectives of the LAP is off relevance in terms of increasing the density and intensity of uses within the centre of Tallaght:

Objective TC1 –

"Continue the transformation of the centre with an increase in existing residential, commercial, retail, civic, services and cultural uses and functions."

Furthermore, the following is taken from Section 12.6.8 of the Development Plan which provides a list of requirements for infill development:

"Development on infill sites should meet the following criteria:

- *Be guided by the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities DEHLG, 2009 and the companion Urban Design Manual;*
- *A site analysis that addresses the scale, siting and layout of new development taking account of the local context should accompany all proposals for infill development.*
- *Larger sites will have more flexibility to define an independent character;*
- *While the minimum standards set will be sought in relation to refurbishment schemes it is recognised that this may not achieve a positive planning outcome, particularly in relation to historic buildings, 'living over the shop 'projects, and tight (less than 0.25 Hectares) urban centre infill developments. In order to allow for flexibility, the standards may be assessed on a case-by-case basis and if considered appropriate, reduced in part or a whole, subject to overall design quality in line with the guidelines*
- *Sustainable Urban Housing: Design Standards for New Apartments, 2020;*
- *Significant site features, such as boundary treatments, pillars, gateways and vegetation should be retained, in so far as possible, but not to the detriment of providing an active interface with the street;*
- *Where the proposed height is greater than that of the surrounding area a transition should be provided (See Chapter 5, Section 5.2.7 of this Chapter and Appendix 10: Building Height and Design Guide);*
- *Subject to appropriate safeguards to protect residential amenity, reduced public open space and car parking standards may be considered for infill development, dwelling sub-division, or where the development is intended for a specific group such as older people or students. Public open space provision will be examined in the context of the quality and quantum of private open space and the proximity of a public park. Courtyard type development for independent living in relation to housing for older people is promoted at appropriate locations. Car parking will be examined in the context of public transport provision and the proximity of services and facilities, such as shops;*
- *Proposals to demolish a dwelling(s) to facilitate infill development will be considered subject to the preservation of the character of the area and taking account of the structure's contribution to the visual setting or built heritage of the area;*
- *All residential consolidation proposals shall be guided by the quantitative performance approaches and recommendations under the 'Site Layout Planning for Daylight and Sunlight' (2nd edition): A Guidelines to Good Practice (BRE 2011) and*

BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’ and / or any updated guidance;

- *It should be ensured that residential amenity is not adversely impacted as a result of the proposed development;*
- *Delivery of Public Open Space and Contribution in Lieu shall be in accordance with the provisions set out under Section 8.7.4 of Chapter 8: Community Infrastructure and Open Space.”*

In response to the abovementioned policies, objectives and guidance, the design and layout of the proposed development has been carefully considered by a highly experienced Design Team to ensure there will be no negative or significant impact on the streetscape, neighbouring properties and character of the area. The following provides a summary of how the proposed development, at a highly underutilised, infill site accords with the requirements mentioned above:

- The proposed development seeks to concentrate the built-form to the perimeter of the site, with public open space, car parking, landscaping and communal amenity space incorporated into the centre of the site to provide visual relief.
- The height of the proposed development, ranging in height 1 No. to 7 No. storeys is in keeping with the prevailing height of the area. It also aligns with the heights prescribed for the site by the LAP.
- Having regard to the proposed height and separation distances of the development, there will be no overbearing or overlooking impact experienced by nearby residents. The *Daylight and Sunlight Assessment* prepared by 3D Design Bureau also confirms that there will be no significant impact to the level of daylight and sunlight received in nearby properties.
- Out of the 199 No. units proposed, 109 No. units will be dual aspect, representing 55% of the total number of units and ensuring high levels of residential amenity as bright and spacious living environments. This also demonstrates the high-quality nature of the proposed site plan.
- The proposed development will include a new pedestrian and cyclist link and crossings to make movement through the site quicker and easier, aligning with policy’s preference for more permeable site layouts.
- The accompanying *Townscape and Visual Impact Assessment* demonstrates that *“...the proposed development will make a positive contribution to the townscape and visual character of the area, with no significant negative effects predicted.”*

Therefore, in our professional planning opinion, the proposal represents an appropriate intensification and densification of development at an underutilised infill brownfield site that is located in a highly accessible location. Consequently, the development of this site will provide much needed housing and non-residential uses whilst avoiding unacceptable negative impacts on the character and amenity of surrounding developments.

7.3 Built-Form: Site Coverage, Plot Ratio and Height

Development management standards and thresholds relating to site coverage, plot ratio and height work in conjunction with each other to define the bulk and scale of a development. This is then articulated and defined to distribute the massing as an appropriate and attractive built-form. Generally, when particular site coverage and plot ratio standards are set, they inform the height of a development.

7.3.1 Site Coverage and Plot Ratio

The Development Plan does not give explicit site coverage or plot ratio standards. The site coverage of the proposed development in its current form stands at 81.7% (footprint of 7,408 sq m across a net site area of 9,071 sq m).

Regarding plot ratio, the LAP states that for Town Centre locations, a general minimum plot ratio of 1.5:1 and a maximum plot ratio of 2:1 shall be applied.

However, page 26 of the LAP does provide flexibility in relation to plot ratio:

"Flexibility in relation to the gross floor area of up to 20% of the plot ratio ranges may generally be applicable where there is a strong design rationale for an increase in density/height and the development will result in a significant public gain."
[emphasis added]

Therefore, **we are of the opinion that the maximum plot ratio that can be achieved at this site is 2.4:1**, subject to a strong design rationale for an increase in density/height and the provision of a 'public gain'. **Evidently, there are 2 No. criteria to be met.**

In relation to the calculation of plot ratio, the LAP remarks that *"...plot ratio ranges and additional 20% floorspace bonus shall normally be calculated on the basis of the gross site area."*
[emphasis added]

In that instance, the subject scheme's plot ratio is calculated based on the relevant²⁶ gross floor area within the building (22,148 sq m) divided by the gross site area (11,928 sq m). This yields a plot ratio of 1.9, per the following calculation:

$$\frac{22,148}{11,928} = 1.9$$

Therefore, the plot ratio is wholly compliant with the prescriptive wording of the LAP, thereby falling within the permissible limit.

However, we note that the subject site's 'gross site area' includes lands beyond those in the control of the Applicant required for water services infrastructure and roads related upgrades. Thus, the 'developable site area' or 'net site area' (9,071 sq m) is the measure that

²⁶ We note that the LAP (page 37) indicates that *"...gross floor area is the sum of all floor space within the external walls of the buildings, excluding plant, tank rooms and car parking areas."* Thus, we contend it is acceptable to omit these aspects of the building when calculating the relevant and appropriate floor area and the plot ratio by extension.

some parties may contend should be applied when calculating plot ratio. On this basis, we have calculated a 'net' plot ratio as follows:

$$\frac{22,148}{9,071} = 2.4$$

Notwithstanding the decreased site area, **the plot ratio continues to fall within the upper limit set by the LAP, but as accommodated by the 20% 'bonus'**. Despite this being based on the net site area, we consider it prudent to demonstrate the development's strong design rationale and the public gain to be secured by way of its delivery. These combine, as facilitated by page 26 of the LAP, to allow for the full application of the 20% bonus to the plot ratio.

7.3.1.1 Strong Design Rationale

In relation to the quality of the proposed development's design and rationale, we respectfully direct the Council to Donnelly Turpin Architects' *Architectural Design Statement*. Therein, the full and carefully considered bases for the pursuing the height, form and materiality is espoused.

Notwithstanding this, we note that the subject development has respected the permissible height limits prescribed by the LAP. Thus, its form and scale are not considered excessive by way of the expectations of that statutory plan. In fact, a reduction in plot ratio would result in a less architecturally considerate design, as it would be a squatter, more monotonous built-form.

Positively, in terms of the design, the Design Team has acted to address the specific items raised by the Council in the *LRD Opinion*.

7.3.1.2 Significant Public Gain

Page 26 of the LAP notes the various methods of delivering a "significant public gain" at a development in its defined area:

- ***"The dedication of part of the site for public open space including parks and plazas, above the standard 10% requirement for public open space on site;***
- ***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/or;***
- ***Other public domain works or improvements to be agreed with the Council."* [Our Emphasis]**

Our understanding is that to be classified as a public gain, **at least one** of the above criteria must be met due to the above stating "and/or". The proposed development is considered to comprehensively constitute a 'significant public gain' as it addresses and complies with **all** 5 No. of the above criteria.

Public Open Space

The proposed development has a developable site area of 9,071 sq m and thus the minimum standard (10%) of public open space required would be 907 sq m. The proposed development provides 1,463 sq m of public open space, which equates to 16.1% of the site area and is in excess of the minimum standard by 556 sq m or 61%. This is a significant exceedance of the minimum requirement in support of delivering a high-quality, attractive and usable public realm.

It is proposed to provide the public open space in the form of permeable link and public plaza (or piazza), in the interstice between Blocks A and B (Figure 7.3).



Figure 7.3: Proposed Public Open Space - Public Piazza and Link Through the Site

Source: Studio Glasú, annotated by Thornton O'Connor Town Planning (2025)

This piazza, in the centre of Tallaght will serve as a vital community and cultural amenity, enhancing the area’s social infrastructure. It is a carefully designed space by Studio Glasú, incorporating seating, bespoke play features, tree and other planting, and bespoke light features (Figures 7.4 and 7.5). Its design and intended use are progressive – seeking to deliver a flexible ‘space with purpose’, which we consider has the potential to be an important benefit to Tallaght.



Figure 7.4: CGI of the Proposed Public Plaza at Ground Floor Level

Source: 3D Design Bureau (2025)



Figure 7.5: CGI of the Proposed Public Plaza at Ground Floor Level

Source: 3D Design Bureau (2025)

Moreover, the piazza itself will serve as a civic space, facilitating public events, cultural activities, and community gatherings. This will foster a sense of place, encouraging social cohesion, and providing a shared venue for cultural expression. The proposed public space aligns with principles of sustainable urban design, enhancing the public realm. The multi-functional or multi-purpose nature of the open space – and the piazza specifically – has been carefully considered by Studio Glasú. As they present in the image extracted as Figure 7.6 below, it has the following potential functions and uses:

- **Day-to-day:** Use for seating and congregation, with adequate space for outdoor dining and entertainment associated with the proposed restaurants, café and bars.
- **Weekend market:** Ample space for stalls to be set up to host a variety of different market types (cooked foods, fresh produce, art, homewares, antiques, Christmas, etc.).
- **Cultural event:** Adequate space and good acoustics to host a range of small cultural events – plays, gigs/concerts, recitals, etc.
- **Outdoor art exhibition:** Plenty of space, natural light and enclosure from the elements to accommodate an outdoor art exhibition.

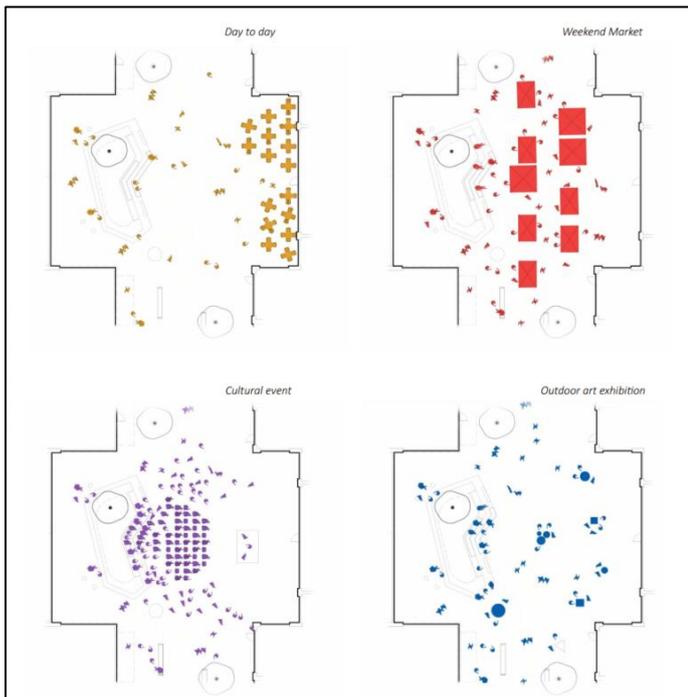


Figure 7.6: Multi-Purpose, Multi-Functional Proposed Plaza Space

Source: Studio Glasú (2025)

Creation of Streets and Links that Provide Access Through and Access to a Site

The development includes an east-west open space that allows access *through* the site and *into* the site. This enhances permeability (as advocated for by planning policy at every level) by allowing easier and quicker pedestrian and cycle movement across the site, rather than forcing active modes to circuitously go around the site when moving between Belgard Square East (west side) and Belgard Road (east side).

The detail and benefit of this connection is shown in Figure 7.6 above and Figure 7.7 below, with the proposed public open space allowing for clear lines of sight and a better connected, passively surveilled urban environment.



Figure 7.7: Pedestrian Crossings and permeability of the Public Open Space

Source: 3D Design Bureau (2025), annotated by Thornton O'Connor Town Planning (2025)

Major Upgrades to Streets Surrounding the Site Including Crossing Points

The proposed development includes 2 No. new pedestrian/cycle crossing points at Belgard Square East (west side) and Belgard Road (east side) (Figure 7.8). These additions will, as with the above design elements, support safer and more permeable movement of persons opting for more sustainable active modes of transport. The crossings tie-in with existing pedestrian and cycle infrastructure and have been designed in accordance with DMURS. Their inclusion is a positive element of the development that goes beyond simply 'developing the site'. We contend that they will better integrate the existing (and now proposed) commercial and residential areas of Tallaght, removing the east-west restriction of movement through this (and the McDonald's) site²⁷.

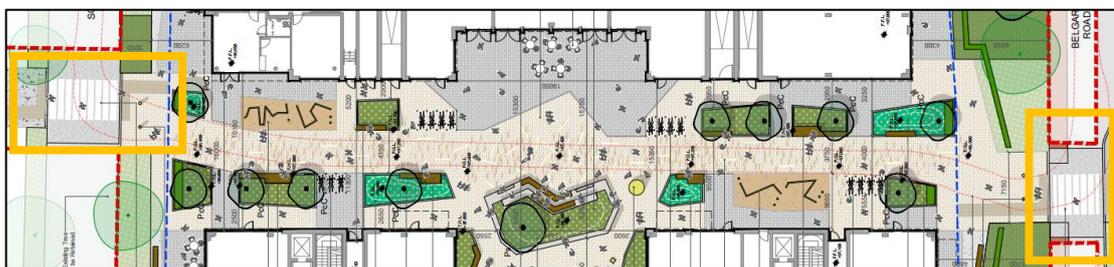


Figure 7.8: Proposed Pedestrian/Cycle Crossings

Source: Studio Glasú (2025), annotated by Thornton O'Connor Town Planning (2025)

²⁷ We note that from Old Blessington Road at the north of the subject site to the pedestrian/cycle link at the south of McDonald's is approximately 170 m. This creates a block layout resulting in long circuitous detours that the crossings will mitigate.

Provision of Community and/or Cultural Amenities

In addition to the notable public open space (discussed above), the proposed development includes a range of social/community uses: dental practice, medical centre and crèche. Additionally, 49 No. of the proposed dwellings are 'senior living' and intended for occupation by older persons as a bespoke housing typology.

In relation to the dental practice and medical centre, these are positive additions that will cater to the needs for future residents of the proposed development, but also those of the existing community (especially as the local population continues to grow).

The crèche is of notable community benefit, not only due to its inclusion, but also due to its size. It has been designed with a capacity for approximately 70 No. children (subject to age and service provided), yet the proposed development only generates a requirement for 40 No. spaces (based on the 20:75 benchmark) and has been calculated to only yield a demand for 8 No. spaces (refer to the enclose *Social Infrastructure Audit*). Thus, the crèche will have significant surplus capacity to cater for the childcare needs of the wider community.

Finally, with respect to the senior living housing, we are firmly of the opinion that its inclusion has social and community benefits. It allows for older persons to remain in the community, right-sizing to a dwelling that is designed to meet their specific needs as they age. This has notable benefits as it allows for social and community ties to be retained, and protects persons' senses of belonging.

Other Public Domain Works or Improvements to be Agreed with the Council

In addition to the above, we contend that the simple delivery of the proposed development will yield a significant public gain. The subject site is currently lying idle, failing to provide any social, aesthetic, environmental or economic benefits to the area. Its redevelopment will bring it back into active, beneficial use with much-needed housing and social and community uses. We are of the opinion that its completion will have an important role in placemaking and the public realm by way of its design and quality materials.

In relation to 'other public domain work or improvements', we note the proposal's proposed planting regimen that will introduce a coherent and appropriate completion of the tree-lining around the site's northern, eastern and western boundaries.

7.3.1.3 Plot Ratio: Concluding Remarks

Upon review of the careful considered additional detail given to the proposed design – in response to observation made in the *LRD Opinion* – and the significant public gain to come from the proposed development, we contend that there is a strong, reasonable basis upon which to permit the utilisation of the additional 20% on top of the plot ratio (calculated using the net site area).

Notwithstanding this, it is worth being cognisant of the impact that not permitting the additional 20% plot ratio would have on the development. We estimate that it could result in the loss of approximately 40–45 No. units²⁸ and either the top 3 No. storeys of Block A or the top 2 No. storeys of Block B. Alternatively, it could result in the loss of non-residential floor space in order to clawback from the lost dwellings from upper storeys. Both would be

²⁸ Approximately 20–22% of the total units proposed.

unfortunate outcomes given: (1) the significant prevailing need for housing; and (2) the significant benefit associated with the inclusion of the proposed mix, location and extent of non-residential uses.

Therefore, we compel the Council to support the case for the application of the additional 20% plot ratio and Grant Planning Permission for same.

7.3.2 Building Height

Section 5.2.7 of the Development Plan and its Appendix 10 set out guidance in relation to building heights within South Dublin, however, as noted in Section 6.2 above, the LAP serves as the local level document and thus the standards therein shall be applied to the subject site. In relation to building height, Section 2.6.2 of the LAP states that:

"Building height and scale is greatest in the Centre, in close proximity to Luas stops and along arterial and primary route frontages"

An extract from the LAP's height strategy is provided in Figure 7.9 below, with the approximate location of the 2 No. proposed blocks annotated thereon. As the uses are primarily residential, with non-residential uses almost entirely limited to the ground floor level only, we contend that the residential (rather than the commercial) height limits established by the LAP are appropriate.



Figure 7.9: Building Height prescribed for the Subject Site (Indicated in Red)

Source: Tallaght Town Centre Local Area Plan (2020)

In this regard the subject site, due to its town centre location (and zoning designation) and its proximity to the Tallaght Luas Stop, is considered a location where the 'greatest' building heights should be sought. It is further stated that the height standards "*may be exceeded... particularly in the core of the town centre proximate to the Luas Terminus and The Square Shopping Centre*". Notwithstanding this possible increase, the proposed development is constrained by the plot ratio limitations and has ultimately been designed to comply with the prescribed height standards of the LAP – i.e. those presented in Figure 7.9.

Block A is principally a 6-storey building running parallel to the site's southern boundary (Figure 7.10). Its form is modulated and disaggregated by way of the break in massing, delivered as a 2-storey feature in the middle. A single-storey runs along the southern side beside the service lane. The form and height allow for the ingress of daylight and sunlight and ensure that the building is not overly monotonous or overbearing. Having reviewed the

design against the LAP (Figure 7.9 above), we contend that the maximum height of 6 No. storeys at Block A, delivered in its considered form, is compliant with the LAP. Whilst the height from to 1 No. and 2 No. storeys, this is deemed to be appropriate to vary the form and to avoid the creation of a 'curtain of development'.

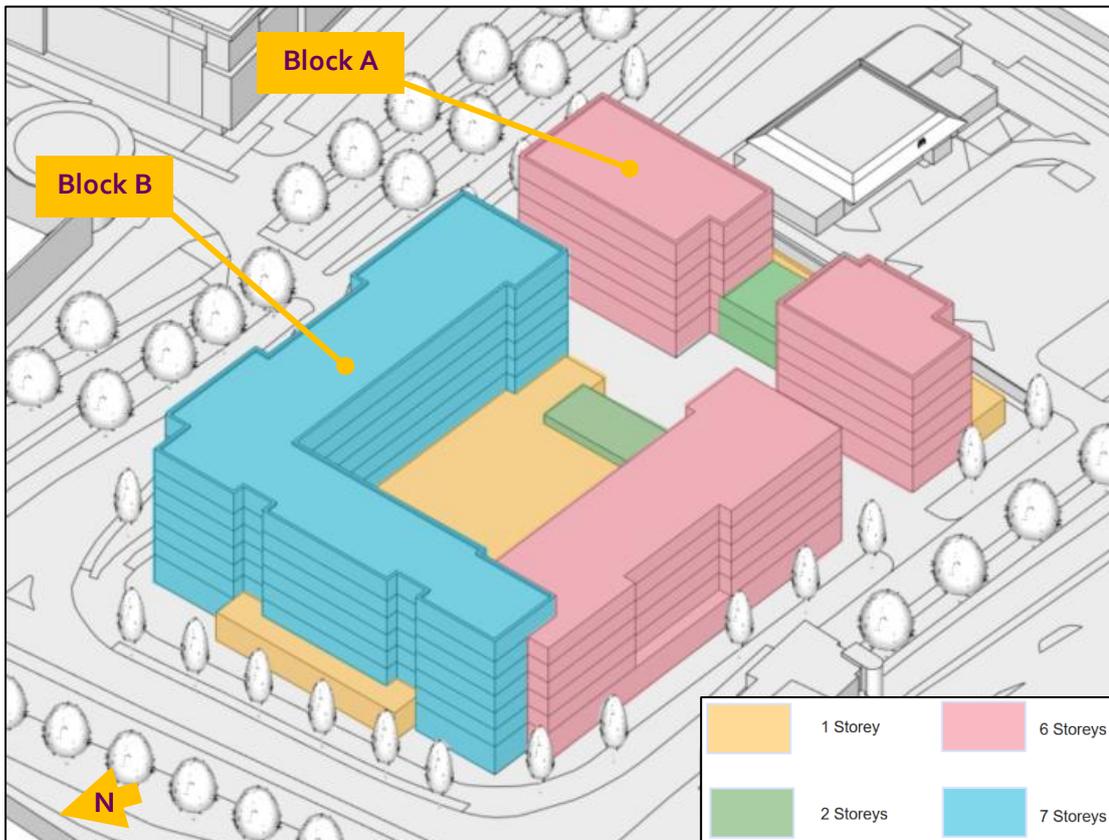


Figure 7.10: Proposed Height and Massing

Source: Donnelly Turpin Architects (2025), annotated by Thornton O'Connor Town Planning (2025)

For Block B, the height and massing is designed in a 'U' shape; with strong, robust presentation to the north, east and west, and an opening to the south (opposite the 2-storey part of Block A (Figure 7.10). This height and built-form create defined edges to the public street of 6 No. storeys to the west and 7 No. storeys to the north and east that are activated by way of the ground floor level uses and fenestration. An overly monotonous and domineering presence is avoided by way of the 'insetting' of the block on its 3 No. street-facing elevations at above ground floor levels. This approach allows the creation of a ground floor level 'base' or 'plinth', which is emphasised by the projection to the north; which gives a sense of robustness to the development.

As in the case of Block A, we contend that Block B is wholly compliant with the LAP as it aligns with the limit of 6 No. to 7 No. storeys to the north and east and the limit of 4 No. to 6 No. storeys to the west. The deviation for the lower storeys is a simple intervention to breakdown the massing in order to avoid monotony of form and overbearance.

The height, scale and massing of the proposed development have not only been designed to accord with those envisaged by the LAP, but to deliver a high-quality scheme that also does not inappropriately impact residential impact and visual context. In these respects, we direct

the Council to the robust *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau and the *Townscape and Visual Impact Assessment* prepared by Purser.

7.4 Density

7.4.1 Local Policy Context

Appendix 10 of the Development Plan is the *Building Height and Density Guide* for the Council area. As stated within the guide, the document has the following 2 No. purposes:

- *"To address the requirement under SPPR₁ of the Urban Development and Building Height Guidelines (2018) and the need for planning authorities to explicitly identify, through their statutory plan, areas where building height will be actively pursued for redevelopment, regeneration and infill development; and*
- *To provide a toolkit for the assessment of proposed increased building heights in development application and development management scenarios."*

With regard to higher densities and placemaking, the plan states:

*"...higher densities support good placemaking because with increased human occupation of the urban area comes **increased ridership for public transport infrastructure and increased footfall to support non-residential uses that lend vibrancy to our towns and villages.** The critical mass that results from increased density cannot be underestimated in the contribution it makes to the vitality of the urban area."* **[emphasis added]**

As such, it is submitted that the proposed development, located on lands zoned 'TC – Town Centre' and in proximity to high-quality public transport systems, can accommodate greater heights and densities as they can add to not only the future commercial development of the site, but also the wider area of Tallaght.

7.4.2 Density as Dwellings per Hectare

No prescriptive standard for density is set in either the Development Plan or the LAP for dwellings per hectare (dph), so the relevant guidance standards are taken from the Compact Settlement Guidelines.

Policy and Objective 3.1 of the Compact Settlement Guidelines states the following:

*"It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these **density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.**"*

At this juncture, we note that the Compact Settlement Guidelines only provide guidance on density as it is established as a 'Policy and Objective' and not an SPPR. With this considered, Policy and Objective 3.1 of the Compact Growth Guidelines states that the recommended density ranges set by the guidelines should be applied in statutory Development Plans and when considering the density for a proposed development. Informed

by this, we contend that the subject site falls within the category 'City – Urban Neighbourhoods', as detailed in Table 3.1 of the Compact Growth Guidelines:

*"The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) **town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges** (defined in Table 3.8) – all **within the city and suburbs area**. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that **residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.**"*

This is based on the site's location within the settlement of Tallaght (which is a designated Town Centre in the Development Plan and the LAP) and its proximity to public transport options to the west.

Consequently, a net density in the range of 50–250 No. units per hectare should be sought under the recommendation of these guidelines. However, the Guidelines provide further guidance relating to 'Refining Density' to take account of specific characteristics and constraints of individual sites. This additional guidance is intended to incorporate the nuances of individual sites, pushing their densities up and down within the ranges set by the Guidelines based on their attributes. 'Refining Density' is comprised of 2 No. steps, which require consideration of: (1) accessibility; and (2) character, amenity and natural environment.

With respect to accessibility, we contend that the subject site performs exceptionally well. This is broadly articulated in Section 2.0 above, but of note are the following:

- The excellent, high-capacity and high-frequency public transport infrastructure (Luas and bus) within the site's immediate environs (less than 5–10 minutes' walk);
- The established and improving cycle infrastructure in the Tallaght area;
- The wide range of services, facilities and amenities within the area surrounding the site; and
- The range of uses that the subject proposals includes.

These positive attributes all combine to warrant a density at the very upper end of the range. In relation to character, amenity and natural environment, we have reviewed the site's location, description and context. We are of the opinion that there are **no notable constraints** that would warrant dropping the appropriate density from the upper end. We note that the site:

- Does not contain any Protected Structures;
- Is not within an Architectural Conservation Area;
- Does not contain any known archaeological features;
- Is a cleared, brownfield site within an existing built-up area that can absorb further development; and
- Is zoned town centre within the planning intention for it to yield higher intensities/densities of development.

In light of the above, there is a practical, pragmatic and reasonable basis to pursue a density of development at the very upper end of the 50–250 dph range.

Drawing from the above, we have calculated the proposed development’s density using the methodology prescribed by the Compact Settlement Guidelines. This is detailed in Table 7.3 below and reveals a density of 243 dph; thereby complying with the range for a site in this location and at this level of servicing.

Stage	Metric	Calculation	Total Site
A	Net Site Area		9,017.0
B	Total GFA	C+D	23,265.0
C	Residential GFA		21,142.0
D	Non-Residential GFA		2,123.0
E	Residential GFA as Proportion of Total GFA	C/B	90.9%
F	Pro Rata Site Area	AxE	8,194.2
G	Number of Dwellings		199
H	Net Residential Density (dph)	G/F/10000	243

Table 7.3: Residential Density of the Proposed Development

Source: Thornton O’Connor Town Planning (2025)

This density represents a minor reduction on that presented in the LRD Meeting proposal (247 dph). In response to this, we see no opposition in the LRD Opinion, with the Council appearing to accept its general premise:

*“In summary, it is noted that the proposed density of 247dp/h is at the upper end of the density range but **nonetheless generally aligns with those recommendations set out in the Compact Growth Guidelines with regards to density for a site in a location such as this.**” [emphasis added]*

7.4.3 Density as Plot Ratio

However, we note that plot ratio is also a measure of density or intensity of development and more accurately reflects the physical scale or quantum of built-form at a site. The LAP’s standards in respect of same are discussed in Section 7.3.1 above, where we robustly justify the appropriateness and quality of the proposed development’s 2.4:1 plot ratio.

7.4.4 Concluding Remarks on Density

Informed by the preceding discussion, we contend that the proposed density – measured as either dph or plot ratio – is wholly appropriate for this highly accessible, town centre site. The proposed development will yield a highly sustainable and efficient use of the subject site, according with planning policy at national, regional and local levels that prioritises greater land-use intensities.

7.5 Dwelling Mix

In relation to dwelling mix, we note the detail of SPPR 1 of the Apartment Design Guidelines, which states:

"(A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.

(B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above."

Having reviewed the Development Plan and its *South Dublin Housing Strategy and Interim HNDA* (Appendix 11), we did not identify any restrictions of note per part (A) of SPPR 1. Considering part (B), it removes prescriptions relating to dwellings mix, thus overriding the Development Plan's H1 Objective 12 and the LAP's Objective RE2, which are listed below for awareness.

H1 Objective 12

"Proposals for residential development shall provide a minimum of 30% 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that:

- there are unique site constraints that would prevent such provision; or*
- that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socioeconomic, population and housing data set out in the Housing Strategy and Interim HNDA; or*
- the scheme is a social and / or affordable housing scheme."*

Objective RE 2

"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."

Notwithstanding SPPR 1, the Applicant and Design Team have sought to comply with the Council's intention to deliver a broad mix of housing sizes. Thus, in terms of the 'standard' housing units in Block B, 48 No. 3-bed units are proposed, equivalent to 32% of the 150 No. total. This complies with both objectives.

The 49 No. senior living units have been excluded from these considerations as they have been specifically designed for occupation by a distinct cohort of older persons who will not need multi-bedroom dwellings as they will be single persons and couples. In our opinion, it would be an arbitrary application of planning policy to require 30% of the senior living dwelling to be 3-bed or larger, as this would result in underoccupied apartments, unnecessary additional costs and a reduction in housing unit delivery due to the need to increase floorplates..

The proposed dwelling mix by block and intended housing typology is presented in Table 7.4. We contend that it complies with SPPR 1 and the provisions of both the Development Plan and the LAP.

No. Beds	Studio	1-bed	2-bed	3-bed	Total
Block A – Senior Living	0	23	26	0	49
Mix	0%	47%	53%	0%	100%
Block B – Standard	6	24	72	48	150
Mix	4%	16%	48%	32%	100%
Total	6	47	98	48	199
Mix	3%	24%	49%	24%	100%

Table 7.4: Proposed dwelling mix

Source: Thornton O’Connor Town Planning (2025)

We affirm for the Council that:

- No 2-bed (3-person) units are proposed;
- No 3-bed (4-person) units are proposed;
- Either within individual blocks or across the development entirely, studio and 1-bed units account for less than 50% of units; and
- Studio units accounts for less than 20% of units.

7.5.1 Supplementary Justification

Notwithstanding the foregoing, should the Council deem it necessary to include the senior living units as part of the total proportion needing to meet the 30% 3-bed requirement, we have provided a supplementary justification below.

We note that H1 Objective 12 of the Development Plan does include the following flexibility: *“a lesser provision [than 30%] may be acceptable where ... the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site”*.

Figure 7.11 below illustrates the CSO Small Areas within a 10-minute walking distance from the subject site. It should be noted that some of the ‘Small Areas’ are partially within / partially outside the 10-minute walking distance area. In these instances, the ‘Small Area’ in question has only been included in our study if it appears that more than half of the ‘Small Area’ is covered by the travelable 10-minute walking distance (highlighted in blue below)²⁹.

²⁹ It is acknowledged that Small Area: A267147025/01 appears to be majority outside the highlighted 10-minute walkable area. However, as the majority of the units are concentrated within the highlighted portion of this ‘Small Area’, it has been included in the study.

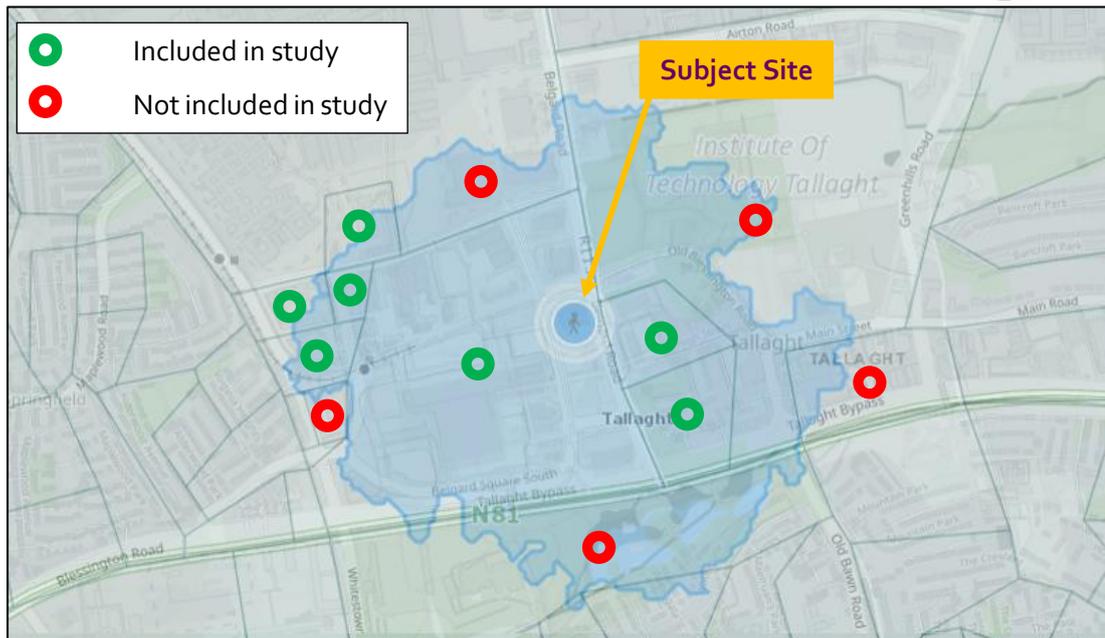


Figure 7.11: CSO Small Areas within a 10-Minute Walking Distance of the Subject Site

(Source: [TravelTime.com](https://www.traveltime.com) and [Visual.CSO.ie](https://visual.cso.ie) Central Statistics Office, Census Interactive Map Data (2022), Annotated by Thornton O'Connor Town Planning, 2025)

Table 7.5 below illustrates the existing number of 1-bed, 2-bed, 3-bed and 3-bed+ dwellings within the CSO Small Areas of a 10-minute walking distance from the subject site.

CSO Small Area Code	1-Beds	2-Beds	3-Beds	4+ Beds	Total
A267147023	7	51	43	41	142
A267147025/03	3	51	76	36	166
A267144001	4	28	45	28	105
A267144004	0	1	2	68	71
A267147025/02	4	37	94	55	190
A267147025/01	3	93	155	107	358
A267147006	4	62	92	68	226
Total (No.)	25	323	507	403	1,258
Total (%)	2%	26%	40%	32%	100%

Table 7.5: Quantity of Different Housing Typologies within 10-minutes Walking Distance of the Subject Site

Source: [TravelTime.com](https://www.traveltime.com) and [Visual.CSO.ie](https://visual.cso.ie) Central Statistics Office, Census Interactive Map Data (2022)

In Table 7.6 below, we compile a summary of the above census data and compare it with the detail of the subject proposal. It becomes evident that the existing stock is comprised largely of 3-bed and larger dwellings (72%), with only 28% as 1-bed and 2-bed units. Thus, **the subject proposal's inverse of this is considered to be wholly appropriate as its will deliver are markedly greater proportion of smaller units to balance the area's established housing stock in favour of units that will cater for smaller household sizes.**

Dwelling Type	Proposed Development		Existing Stock		Variation
	No. Units	% Units	No. Units	% Units	
1-bed	53	27%	25	2%	76% v 28%
2-bed	98	49%	323	26%	
3-bed	48	24%	507	40%	24% v 72%
4-bed and larger	0	0%	403	32%	
Total	199	100%	1,258	100%	-

Table 7.6: Quantity of Different Housing Typologies within 10-minutes Walking Distance of the Subject Site

Source: [Visual.CSO.ie](https://visual.cso.ie) Central Statistics Office, Census Interactive Map Data (2022) and Donnelly Turpin Architects (2025) and Thornton O'Connor Town Planning (2025)

It should also be noted that the 2023 iteration of the Apartment Design Guidelines, stated the following, highlight shifting trends in household size and housing need:

"Demographic trends indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2 persons, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type.

The 2016 Census also indicates that, if the number of 1-2 person dwellings is compared to the number of 1-2 person households, there is a deficit of approximately 150% i.e. there are approximately two and half times as many 1-2 person households as there is 1-2 person homes. The 2016 Census indicated that 1-2 person households now comprise a majority of households and this trend is set to continue, yet Ireland has only one-quarter the EU average of apartments as a proportion of housing stock. Dublin as a whole has approximately one-third the rate of apartments as comparable cities in Europe, with which it competes for investment and talent to secure continued growth and prosperity.

Analysis of urban housing need points to the fact that into the future, a majority of households will comprise 1-2 persons and approximated half of the remainder will be three person households. While it is recognised that it will be necessary to provide for a range of incomes, it is critical to accommodate the needs of increasingly more diverse household types in the context of a growing and ageing population."

In this regard, given that two thirds of Irish Households added to the market since 1996 comprise 1-2 No. person households, yet only 21% of dwellings completed since then comprise apartments of any type, it is considered wholly appropriate to provide a development consisting primarily of 1–2 No. bed units that directly addresses demographic trends and market demand for apartment units.

With regard to the foregoing, it is considered that the proposed unit mix is appropriate on the basis of demographic analysis and market demand. The proposed development will provide for the population of Tallaght, catering for young professionals, small families and empty nesters.

7.6 Dwelling Design and Amenity

The following Sub-Sections detail and assess several of the key dwelling design considerations, notably in relation to internal floor areas, private amenity space, aspect and floor-to-ceiling heights. We note that the standards to be met are now principally informed by the content of the Apartment Design Guidelines.

7.6.1 Internal Floor Areas

The internal floor area (IFA) standards for apartments are set by SPPR 2 of the Apartment Design Guidelines, as follows:

"The following minimum apartment floor areas shall apply and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:

- *Studio apartment (1 person) 32 sq.m*
- *1-bedroom apartment (2 persons) 45 sq.m*
- *2-bedroom apartment (3 persons) 63 sq.m*
- *2-bedroom apartment (4 persons) 73 sq.m*
- *3-bedroom apartment (4 persons) 76 sq. m*
- *3-bedroom apartment (5 persons) 90 sq.m*

The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing."

With respect to unit designs, layout and IFA, we direct the Council to the *Compliance Schedule* (in the *Architectural Design Statement*) and the various floor plan drawings prepared by DT. This confirms that the minimum IFAs are met or exceeds for all units.

In addition to these minimum internal floor areas, the Guidelines stipulate that:

"In the interests of delivering sustainable and good quality urban development, these Guidelines should be applied in a way that ensures a good mix of apartment sizes. Accordingly, at least 25% of units within a development shall exceed the minimum sizes set out in SPPR2 by 10%, with the potential for more than 25% of units to exceed the sizes set out in SPPR2 to be provided as required on a scheme-by-scheme basis in apartment schemes in more suburban locations, social housing developments, social and affordable housing delivered under Part V10 and schemes to provide housing for older persons and/or persons with disabilities."

As confirmed in the number in DT's *Compliance Schedule*, 107 No. of the 199 No. proposed units exceed the minimum IFAs by at least 10%. This accounts for 53.8% of all units.

Therefore, the proposed units are in compliance with the minimum IFAs of SPPR 2 and the Guidelines' supplementary guidance.

7.6.2 Universal Design and Age Friendly Living

Of the 199 No. proposed units, 49 No. (25%) are 'senior living' and intended for occupation by older persons. They have been designed in accordance with key principles of universal design. As DT state in their *Architectural Design Statement*:

"These [senior living] units are designed to adhere to the Universal Design Guidelines and provide larger apartment units with additional area for clear turning spaces and to meet the recommended minimum unobstructed room dimensions, clearance widths etc. to support older persons who may be in wheelchairs or have other disabilities or impairment."

By proactively incorporating this housing design and typology into the proposed development, it broadens the range of options available to the local community, delivering age friendly living for older members.

7.6.3 Private Amenity Space

In relation to the provision of private amenity space for units, the area requirements of the Apartment Design Guidelines applies. The requirements are shown in Table 7.7 below.

Unit Size	PAS Standard per Unit
Studio	4 sq m
1-bed	5 sq m
2-bed (4-person)	7 sq m
3-bed (5-person)	9 sq m

Table 7.7: Private amenity space requirements for apartment dwellings

Source: *Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)*

The areas proposed for each unit are presented in the *Compliance Schedule* (contained in DT's *Architectural Design Statement*) and on the various unit drawings. As is evident, the minimum requirements of the Guidelines are matched or exceeded in all cases. In fact, there are instances where rates of provision are comfortably exceeded, thereby enhancing the residential amenity of dwellings for future occupants.

In accordance with the Guidelines, the private amenity spaces are proposed as terraces at podium level and as balconies elsewhere, with minimum depths of at least 1.5 m achieved to ensure they are appropriately sized and functional. Landscaping and hedgerow boundaries soften the edges and interfaces between private amenity spaces and communal amenity spaces, achieving an appropriate buffer and the creation of defensible space.

7.6.4 Aspect

Of the 199 No. proposed dwellings, 109 No. are dual aspect; equivalent to 55%.

This exceeds the blanket 25% requirement set by SPPR 3 of the Apartment Design Guidelines³⁰:

³⁰ The 55% rate of provision also exceeds the 33% minimum set by the previous iteration of the Apartment Design Guidelines (2023).

"In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.*
- (ii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects."*

No single aspect north-facing units are proposed.

Further identification of the benefitting units is presented in DT's *Architectural Design Statement* and suite of drawings.

7.6.5 Floor-to-Ceiling Heights

In relation to floor-to-ceiling Heights of units, the Apartment Design Guidelines' SPPR 4 sets the standard to be met:

"Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.."

Building Regulations Technical Document F addresses ventilation and provides guidance on ceiling heights in habitable rooms. The suggested minimum floor-to-ceiling height, consistent with good room design, the use of standard materials and good building practices, is generally 2.4 m.

No ground floor level units are proposed, therefore, SPPR 4 does not apply. However, as detailed in the drawings prepared by DT, all above ground floor-to-ceiling heights exceed the minimum of 2.4 m. This achieves a higher quality living environment for future residents, with greater natural ventilation and light ingress.

7.6.6 Storage

In relation to the provision of internal storage provided in units, instruction is again taken from the Apartment Design Guidelines. Its minimum requirements for the proposed unit types and sizes are shown in Table 7.8 below, with the following additional guidance provided:

"Storage should be additional to kitchen presses or cupboards and loose bedroom furniture, but may be partly provided in these rooms. In such cases this must be in addition to aggregate living/dining/kitchen or bedroom floor areas. A store off a hallway or landing will facilitate access, but hot presses or boiler space/heat pump will not count as general storage. As a rule, no individual storage room within an apartment should exceed 3.5 square metres."

The proposed storage areas for each of the units are presented in the *Compliance Schedule* (contained in DT's *Architectural Design Statement*) and on the various unit drawings. As is evident, the minimum requirements of the Guidelines are matched or exceeded in all cases. It is shown on the various floor plan that no single storage room/space exceeds 3.5 sq m.

Unit Size	Storage Requirement per Unit
Studio	3 sq m
1-bed	3 sq m
2-bed (4-person)	6 sq m
3-bed (5-person)	9 sq m

Table 7.8: Storage space requirement for the proposed unit sizes

Source: *Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)*

7.6.7 Daylight and Sunlight

With respect to daylight and sunlight availability serving the proposed development, we direct the Council to the *Daylight and Sunlight Assessment Report* prepared by 3DDB. As a relatively dense development at a constrained urban site, the scheme performs well:

- Daylight (Spatial Daylight Autonomy (SDA)) (584 No. rooms assessed in 199 No. units) –
 - 96% of rooms compliant "without trees".
 - 96% of rooms compliant "with trees".
- Sunlight (Sunlight Exposure (SE)) (199 No. units assessed) –
 - 92% of units compliant "without deciduous trees".
 - 92% of units compliant "with trees as opaque objects".

Although a small proportion of rooms and units do not meet the SDA and SE targets respectively, this is considered to be appropriate given: (1) the LAP defines the site layout and required heights; (2) the constraints of the site shape; (3) the infill, town centre location and zoning of the site; and (4) the overall quality of the proposed development. This position is further **asserted by the BRE209 Guide itself**, which states:

*"The guide is intended for building designers and their clients, consultants, and planning officials. **The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design...**" [emphasis added]*

Therefore, the Guide is just that – a guide – and not a standard against which a development must slavishly and absolutely comply. Overall, it is considered that the proposed development will result in a series of high-quality and attractive living spaces for future residents.

7.6.8 Units per Core

SPPR 5 of the Apartment Design Guidelines states: *“There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.”*

We note that the wording above ultimately places no restriction on how few units can be proposed per core. Therefore, it places no restriction or limitation on the proposed development. Consequently, the proposed development complies with its content.

7.7 Separation Distances

The Development Plan stipulates a general minimum clearance distance of approximately 22 meters between opposing windows. However, we recognise that the Compact Settlement Guidelines, as Section 28 Guidelines, establish SPPR 1 regarding separation distances, which takes precedence over the general standard outlined in the Development Plan and thus shall be applied in its place.

The Compact Settlement Guidelines considers that the standard 22 No. metres separation distance between opposing upper floor rear windows does not account for modern methods of design and construction and the capability of assessing the appropriate level of daylight and sunlight being received by neighbouring dwellings and the level of privacy obtained. In this regard, the Compact Settlement Guidelines state:

*“Through the careful massing and position of blocks, positioning of windows and the integration of open space at multiple level it is possible to achieve a high standard of residential amenity and good placemaking with **separation distances of less than 22 metres**. Separation distances should, therefore, be determined based on considerations of privacy and amenity, informed by the layout, design and site characteristics of the specific proposed development.” [emphasis added]*

Furthermore, SPPR 1 of the Compact Settlement Guidelines states the following in regard to minimum separation distances for residential development:

*“It is It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, **a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.***

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.” [emphasis added]

As there are no immediately adjacent residential developments to the subject site³¹, the scheme is compliant with the SPPR from an ‘external perspective’.

The separation distances between opposing windows within the development have been carefully considered to ensure appropriate levels of privacy and compliance with the guidelines.

For example, for Block B, the separation distance between opposing windows on the eastern and western internal façades is 35.4 metres (Figure 7.12).

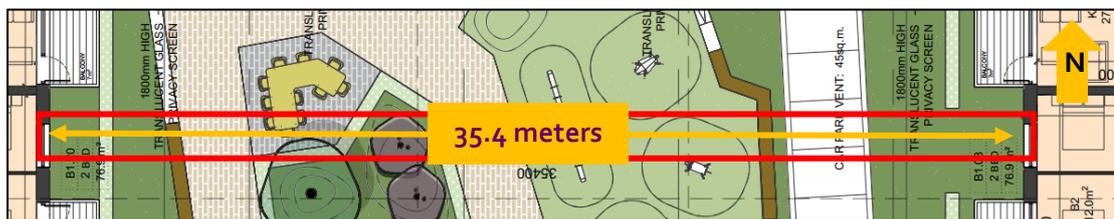


Figure 7.12: Separation Distance between Eastern and Western internal facades of Block B

Source: Donnelly Turpin Architects, annotated by Thornton O’Connor Town Planning (2025)

The proposed separation distance between windows along the eastern and western internal façades of Block A stand at 19 metres, at first and second floor level only (Figure 7.13). Above the second floor, balconies are positioned opposite each other; however, 16 metres is still achieved (based on 1.5 metre depths) and they have been offset to prevent direct alignment, ensuring adequate privacy (Figure 7.14).

³¹ Tuansgate Apartments are the closest, some 50 m from the site.

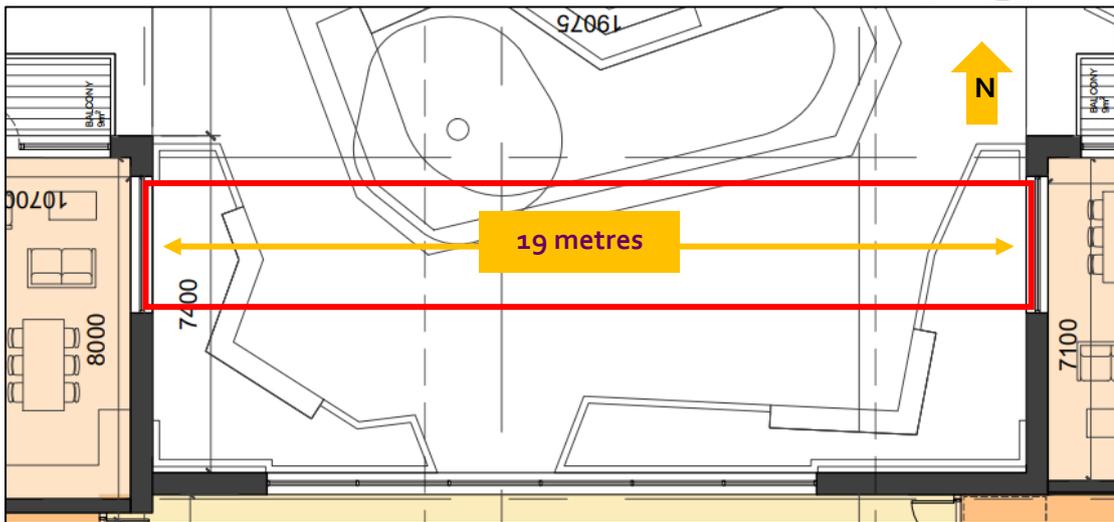


Figure 7.13: Separation Distance between Eastern and Western internal facades of Block A (first and second floor level)

Source: Donnelly Turpin Architects, annotated by Thornton O'Connor Town Planning (2025)

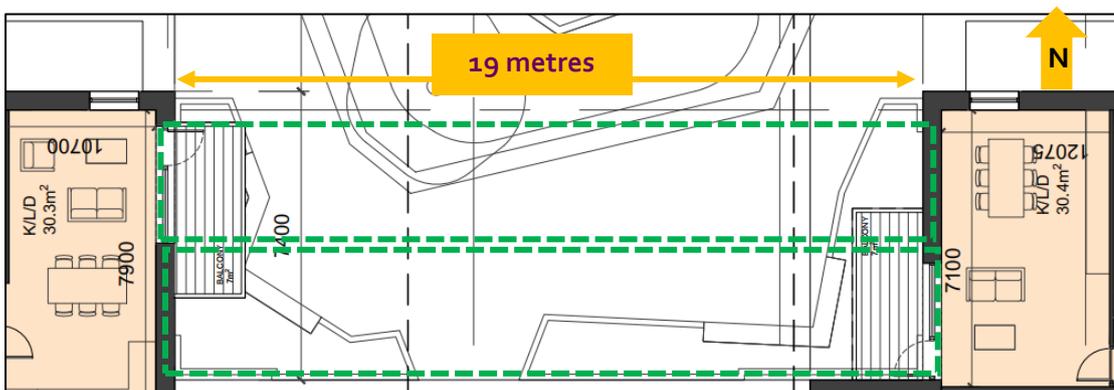


Figure 7.14: Off set balconies between Eastern and Western internal facades of Block A (third, fourth and fifth floor level)

Source: Donnelly Turpin Architects, annotated by Thornton O'Connor Town Planning (2025)

It is noted that the separation distances between Blocks A and B is 15 m across the public open space and public plaza, which is only 1 m less than the SPPR 1 standard. However, the design of the blocks has sought to comply with the SPPR by ensuring that there are no directly opposing windows.

In this regard, the 15-metre separation distance between Blocks A and B is appropriate in all instances by way of the offsetting/staggering of windows (Figure 7.15) and the inclusion of clerestory windows (7.16).

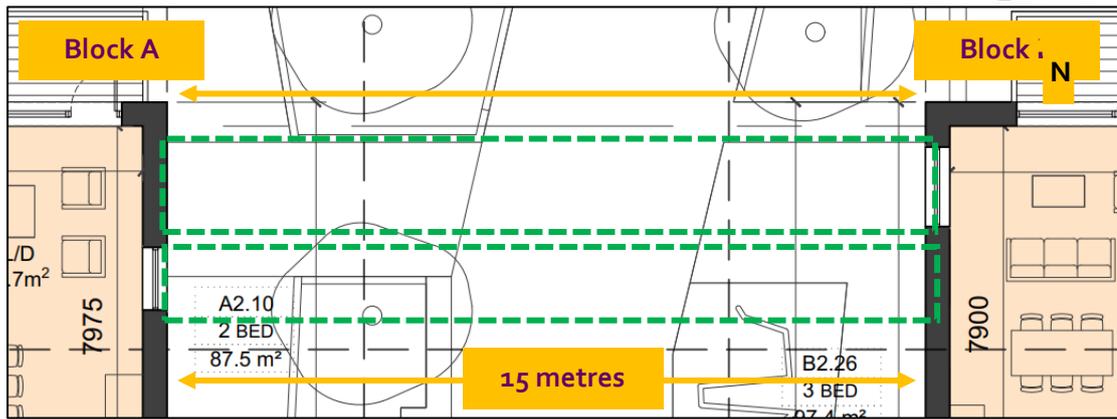


Figure 7.15: Offset windows between Blocks A and B

Source: Donnelly Turpin Architects, annotated by Thornton O'Connor Town Planning (2025)

In the second instance, high level clerestory windows have been implemented into the design of some of the kitchen / living / dining rooms in this '15-metre' buffer area. Thus, no "undue overlooking of habitable rooms and private amenity spaces" is considered to occur.

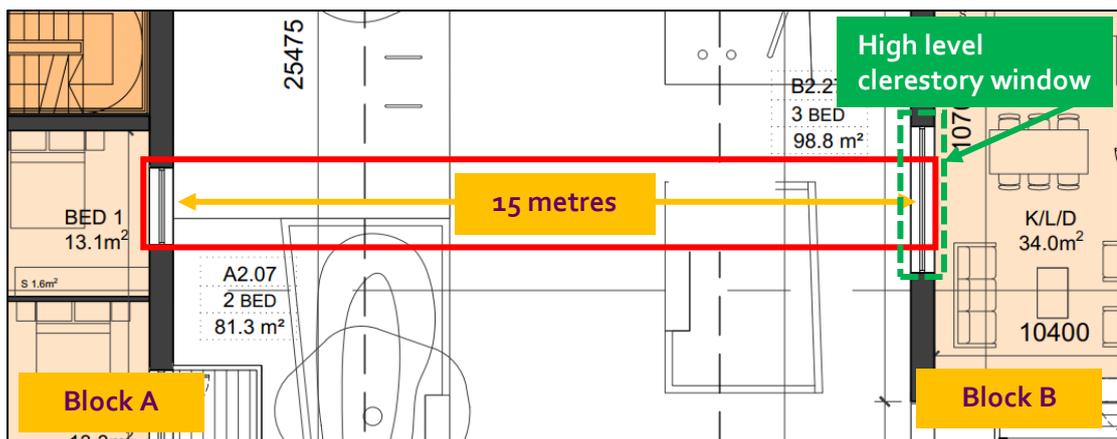


Figure 7.16: Use of high-level clerestory window between Blocks A and B where window positions oppose each other

Source: Donnelly Turpin Architects, annotated by Thornton O'Connor Town Planning (2025)

Further to the above, we consider it relevant to highlight that there is a 1.6-metre (effectively a half storey) variance in finished floor levels between Blocks A and B, with Block B positioned at a slightly higher elevation. This variation in elevation, as illustrated in Figure 7.17, further eliminates the potential for overlooking. Thus, there is offsetting both horizontally (on plan) and vertically (in elevation).

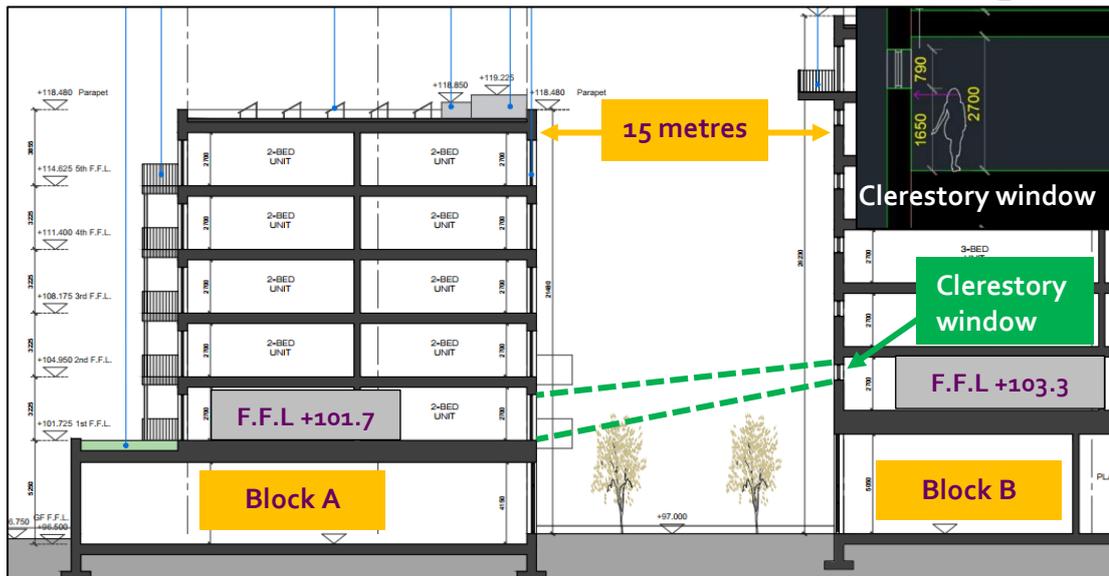


Figure 7.17: Slope in floor levels between Blocks A and B, and location / design of high-level clerestory windows proposed

Source: Donnelly Turpin Architects, annotated by Thornton O'Connor Town Planning (2025)

Given the above considerations, it is evident that the proposed development effectively mitigates privacy concerns through a combination of adequate separation distances, offset window arrangements, high-level clerestory windows and elevational differences.

Thus, the development is fully compliant with SPPR 1 of the Compact Settlement Guidelines, ensuring a minimum separation distance of 16 metres between opposing windows where applicable. Where minor shortfalls exist, they are adequately addressed through design interventions that eliminate undue overlooking and safeguard residential privacy.

7.8 Landscaping, Open Space and Arboriculture

Open space in a general sense is categorised as public open space, communal amenity space and private amenity space. Public open space is publicly accessible land that future residents, as well as the existing local community and passers-by, can use freely. Communal amenity space is semi-private in its intention and proposed for use specifically by future residents of a proposed development, thereby allowing for relaxation, socialising and integration. Private amenity space is provided on a dwelling-by-dwelling basis, with individual spaces designed solely for private use by the residents of the related unit.

7.8.1 Public Open Space

Table 12.22 of the Development Plan defines the minimum public open space standards in the County (Table 7.9 below).

Land Use	Minimum Public Open Space Standards
Overall Standard	2.4 Ha per 1,000 population
New Residential Development on Lands Zone RES-N	15% of the site area
New Residential Development on Lands in Other Zones including mixed use	10% of the site area
Institutional Lands / 'Windfall' Sites	20% of the site area

Table 7.9: Minimum public open space standards

Source: South Dublin County Development Plan 2022 – 2028

Moreover, the LAP states that:

"A minimum of 10% of the gross site area shall be dedicated for use as public open space within any proposal for development which shall be of a high quality and integrated into an overall interconnected network of public open space and green routes." [emphasis added]

Informed by the above, the proposed development provides 1,463 sq m of public open space as a central space that includes a plaza as a focal point. This area accounts for 12.3% of the gross site area (11,928 sq m / 1.19 Ha). Whilst this exceeds the minimum requirement, we contend that its application against the gross site is not a true reflection of the scale of the space, as approximately 2,857 sq m / 0.28 Ha is not actually developable for public open space, as it relates to roads, verges, etc. to facilitate road upgrades, water infrastructure and landscaping beyond the main development site area. Therefore, we are of the opinion that the net development site (9,017 sq m / 0.91 Ha) is the more appropriate area to be used for calculating public open space. In this case, the proposal equates to 16.1% of the total.

Ultimately, in both scenarios, the minimum standards are exceeded.

In terms of the design of the public open space, this is an attractive urban intervention that acts as a pedestrian/cycle connection. However, it far more than just a link route. It incorporates:

- A central piazza (or plaza), with potential for multiple uses and the possibility of becoming a focal point for the community;
- Various seating areas for all ages, including an attractive, angular tiered seating centrepiece;
- Unique, bespoke children's play features that provide functional, play and aesthetic benefits;
- A series of trees including Scots Pine and Callery Pear to create a linearity through the space;
- Multiple planter features; and
- Proposed public art element.

The open space incorporates permeable hard-surfacing to achieve a robust and purposeful design, whilst adding to the suite of SuDS measures utilised. This also facilitates the multi-functionality of the public open space, as illustrated by the image in Figure 7.18 prepared by Studio Glasú. The size, shape, design and planting of the piazza allow for a wide-range of potential uses.

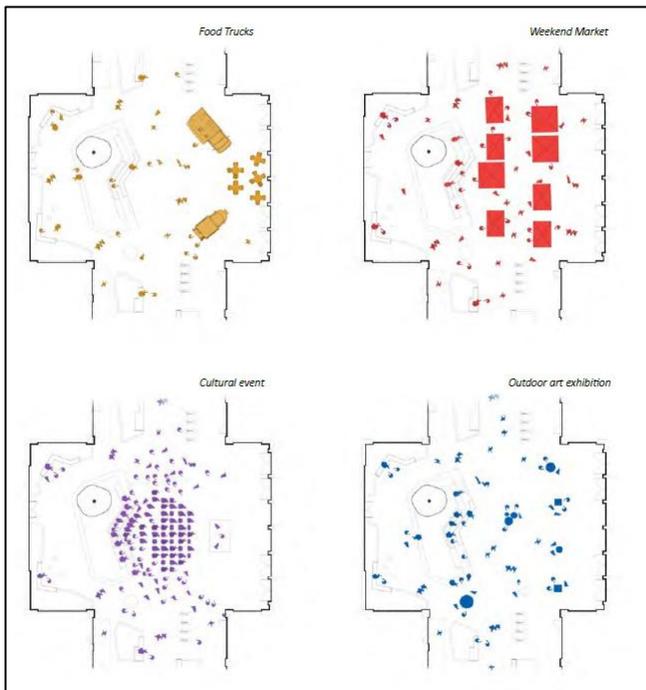


Figure 7.18: The proposed central piazza’s flexibility, giving it a multi-functional role and the potential to accommodate a range of different uses

Source: Studio Glasú (2025)

The open space’s incorporation of tree lines (Scots Pine and Callery Pear) introduces greening and a verticality through the space, as well as a softening of the built-form. Seating is included, with a feature, tiered element at the core of the piazza.

In terms of the sunlighting of the proposed public open space, this has been estimated by 3D Design Bureau as 63.9% of its area achieving at least 2 No. hours of direct sunlight on 21st March, thereby exceeding the 50% minimum recommended by the BRE Guidelines.

CGIs of the central open space and piazza are provided as Figures 7.19 and 7.20, demonstrating its key design features and overall quality. Please refer to the submitted materials prepared by Studio Glasú for full details of the public open space.



Figure 7.19: CGI of the proposed central public open space looking west capturing the bespoke play feature, tree planting and seating

Source: 3D Design Bureau (2025)



Figure 7.20: CGI of the proposed central public open space, within the central plaza looking north-west capturing the tree planting proposals, tiered seating and attractive surface treatments

Source: 3D Design Bureau (2025)

7.8.2 Communal Amenity Space

In addition to public open space, the Apartment Design Guidelines prescribe a need for communal amenity space. The minimum areas required for each dwelling type are presented in Table 7.10.

Unit Type	Communal Open Space Required
Studio	4 sq m
One Bedroom	5 sq m
Two Bedroom (4-person)	7 sq m
Three Bedroom (5-person)	9 sq m

Table 7.10: Minimum Private Amenity Space Standards for Apartment Dwellings

Source: *Planning Design Standards for Apartments: Guidelines for Planning Authorities (2025)*

Such space must be semi-private in nature and can be provided in a variety of different forms, such as courtyards, rear and side gardens, roof tops terraces, etc. and should be distinct from private and public open spaces.

Community Amenity Space Block A

Based on the proposed unit mix of 23 No. 1-bed and 26 No. 2-bed 'senior living units' at Block A, a minimum of 297 sq m of communal amenity space is required.

No. Beds	Studio	1-bed	2-bed	3-bed	Total
Block A	0	23	26	0	49
CAS Standard (sq m)	4	5	7	9	
CAS Required (sq m)	0	115	182	0	297

Table 7.11: Communal amenity space required based on the dwelling mix of Block A

Source: *Thornton O'Connor Town Planning (2025)*

Block A provides 303 sq m of communal amenity space, which is in excess of the minimum requirement. The communal amenity space at Block A is proposed to be located both internally at first floor level (114 sq m), and externally at ground floor level in an enclosed space (139 sq m) and externally at first floor level in a south-facing terrace (50 sq m). The inclusion of the internal and the enclosed ground floor community amenity spaces is a practical decision intended to enhance the quality and usability of these areas for older residents.

The internal area is centrally located at the first floor level, where it connects to both the lift and stair cores which serve the apartments in the 6-storey blocks on either side. The internal community amenity space provides a suitable alternative for older residents during the winter months and days of inclement weather. The space overlooks the central open space, with its piazza, on the north side and a long generous terrace, facing south on the other side.

In addition, the enclosed external communal amenity space is provided at ground floor level. It is located directly off the main public piazza and can be used as a separate entrance for residents and visitors, providing a semi-private, secure and sheltered area to meet. Locating the amenity spaces for older persons in Block A adjacent to and overlooking the public plaza places them at the heart of the community and provides passive surveillance of the central public space during the day and at night-time.

Community Amenity Space Block B

Based upon the proposed mix of 6 No. studios, 24 No. 1-bed, 72 No. 2-bed and 48 No. 3-bed 'standard' units at Block B, a minimum of 1,080 sq m of communal amenity space would be required to serve its 150 No. residential units (Table 7.12).

No. Beds	Studio	1-bed	2-bed	3-bed	Total
Block B	6	24	72	48	150
CAS Standard (sq m)	4	5	7	9	
CAS Required (sq m)	24	120	504	432	1,080

Table 7.12: Communal amenity space required based on the dwelling mix of Block A

Source: Thornton O'Connor Town Planning (2025)

Block B provides 1,398 sq m of communal amenity space (Figure 7.22), which is in excess of the minimum requirement by approximately 318 sq m or 29%. Block B's communal amenity space is accommodated at podium level, directly above the car park at ground floor and easily accessible from the 4 No. stair/lift cores serving the apartments. The space is defined by the U-shaped apartment block and is orientated due south, maximising the space's exposure to sunlight.

This podium level communal amenity space has been designed to a high standard and boasts ample planting and greenery throughout. Additionally, there are several seating areas, including a raised roof garden (140 sq m) to the south of the space which provides views over the public piazza, which consequently benefits from passive surveillance. The space, with its south facing orientation, offers an opportunity for rooftop allotments and a place to gather, socialise and watch events in the central space below. The podium provides a designated play space (125 sq m) and a ping pong table to encourage physical activity and socialising. The space is overlooked by apartments above and therefore benefits from passive surveillance and provides residents with views of an attractive internal garden and recreational spaces.



Figure 7.22: CGI of the Communal Amenity Space at Block B

Source: 3D Design Bureau (2025)

7.8.3 Private Open Space

See Section 7.6.3 above for details of this aspect of the development.

7.8.4 Green Space Factor

We note that the Development Plan is progressive in its efforts to deliver high quality open spaces and green infrastructure. In this light, we are mindful of GI5 Objective 4:

"To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2)."

Per Studio Glasú's design and calculations, a GSF score of 0.42 has been achieved. This is an increase on 0.39 from the LRD Meeting proposal. Whilst the target score of 0.5 is sought for town centre zoned sites, we consider the score to be appropriate for the following reasons:

- The existing site is of limited ecology and green infrastructure value due to its surface type and idle nature;

- As a town centre site and a mixed use development, materials must be robust for expected footfalls, hence greater use of hard surface (albeit permeable);
- The proposal has sought to include a range of SuDS features to aid the sustainable management of surface water; and
- A broad tree and planting regimen is proposed, including native species.

Furthermore, following the supplementary meeting with Council representatives in August 2025, the score was noted by them as being acceptable.

7.9 Surface Water Management and SuDS

Safe and sustainable surface water management features as an increasingly vital aspects of development design and operation in response to urban densification, climate change and the need to protect and enhance biodiversity. In light of this, we note the following policies and objectives of relevance in the Development Plan:

Policy GI4 – *"Sustainable Drainage Systems Require the provision of Sustainable Drainage Systems (SuDS) in the County and maximise the amenity and biodiversity value of these systems."*

GI4 Objective 1 – *"To limit surface water run-off from new developments through the use of Sustainable Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Explanatory Design and Evaluation Guide, 2022."*

GI4 Objective 2 – *"To incorporate a SuDS management train during the design stage whereby surface water is managed locally in small sub-catchments rather than being conveyed to and managed in large systems further down the catchment."*

GI4 Objective 3 – *"To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management."*

GI4 Objective 4 – *"To require that all SuDS measures are completed to a taking in charge standard."*

GI4 Objective 5 – *"To promote SuDS features as part of the greening of urban and rural streets to restrict or delay runoff from streets entering the storm drainage network."*

GI4 Objective 6 – *"To maintain and enhance existing surface water drainage systems in the County and promote and facilitate the development of Sustainable Drainage Systems (SuDS), including integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality."*

Also of relevance is Section 12.11.1 (Water Management), specifically parts (ii) and (iii) which relate to surface water and SuDS respectively.

In light of these provisions and in accordance with best practice and the overall benefit of the proposed development, a series of SuDS measures are incorporated into the development to appropriately manage surface water. These are discussed in detail in Torque's enclosed

Engineering Services Report, and combine to achieve the Council's objectives of water quality, water quantity, amenity and biodiversity. The measures proposed include:

- Blue roofs,
- Permeable paving,
- Tree pits, and
- Raised planters.

7.10 Flood Risk

Consideration of flood risk is of a continued and increasing importance in urban locations given the emphasis being placed on densification and the potential hazards associated with climate change.

Having reviewed the Development Plan, we deem IE4 Objective 1 to be of greatest relevance:

"To require site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12 / 2014 and the EU Floods Directive and Chapter 12: Implementation and Monitoring and the policies and objectives of this chapter."

Accordingly, a *Flood Risk Assessment Report* has been prepared by Torque and is included as part of this Planning Application pack. Positively, it concludes:

- *"A summary of the level of service was provided with a review of the office of public works flood maps indicating that the subject site does not occur within any previous instances regarding flooding."*
- *The subject site is not required to be reviewed under South Dublin City County Council requirement for a justification test and is deemed to be in compliance with their county development plan (2022-2028) flood risk strategy requirements."*
- *The subject site falls outside the 0.1% AEP fluvial, pluvial and coastal flood zone which thus indicates the subject site can be classified as Zone C (low probability of flooding)."*
- *The subject site falls within a moderate area of vulnerability for groundwater flooding and overlays an existing gravel aquifer."*
- *The stormwater drainage system has been designed to account for climate change and exceedance flows. The implications of pipe blockages have been examined and have been modelled accordingly."*

7.11 Parking

Parking – for cars, motorcycles and cycles - is an important aspect of all developments as its provision facilitates the mobility of residents, visitors, workers and patrons. As noted above and below, the prioritisation of active and passive modes is heavily emphasised in national and local policy.

7.11.1 Car Parking

7.11.1.1 Residential Car Parking

With respect to the residential car parking requirement, we first refer to SPPR 3 (Car Parking) of the Compact Settlements Guidelines:

"It is a specific planning policy requirement of these Guidelines that:

- i. In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.*
- ii. In accessible locations, defined in Chapter 3 (Table 3.8) car-parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.*
- iii. In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling.*

Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."

In terms of the location of the site, we contend that it falls within the category 'City – Urban Neighbourhoods', as detailed in Table 3.1 of the Compact Settlements Guidelines:

*"The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) **town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8)** – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork."*

This is based on the site's location within the settlement of Tallaght, which is a designated Town Centre in the Development Plan and the LAP. We also note that it fall within the category of 'lands around existing or planned high-capacity public transport nodes or interchanges' due to its proximity to Luas and bus services to the west.

Consequently, the **maximum rate of car parking of 1 No. space per dwelling applies.**

The maximum car parking provision for the proposed development would, therefore, be 199 No. spaces (for the residential development) based on the proposed number of dwellings. However, as stated in Section 5.3.4 of the *Compact Settlements Guidelines*, car parking ratios "*should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport*". As identified above, the subject site is highly accessible given its proximity to the Tallaght Luas Stop, various bus stops, services and facilities, and employment opportunities at The Square Shopping Centre and Cookstown Industrial Estate. These attributes are all discussed in Section 2.0 above.

In addition, it should be noted that 49 No. (or 25%) of the units proposed are 'senior living' apartments, where it is understood that **there would be limited demand for car parking spaces** and driving in general.

Thornton O'Connor are of the professional planning opinion that the subject scheme, by virtue of its 'urban neighbourhood' location, its classification within a 'High Capacity Public Transport Node or Interchange' and the fact that 25% of residents (senior living) can be assumed will have limited car parking requirements, appropriately establishes an opportunity for car parking provision to be "substantially reduced" for the residential uses, in accordance with SPPR 3.

Thus, the development proposes 58 No. car parking spaces for the residential units, equating to a residential car parking ratio of 0.29 No. spaces dwelling. This is a highly progressive car rate of car parking provision that responds to planning and mobility policy, and is reflective of the site's town centre location, public transport services and the availability of a host of locally available services, facilities and amenities.

7.11.1.2 Non-Residential Car Parking

Regarding non-residential car parking, Table 12.25 of the Development Plan defines the maximum parking rates for the non-residential uses proposed in the subject development. The site falls within 'Zone 2 (Non Residential)':

"More restrictive rates for application within town and village centres, lands zoned REGEN, and brownfield / infill sites within Dublin City and Suburbs settlement boundary within 800 metres of a train or Luas station and within 400-500 metres of a high quality bus service (including proposed services that have proceeded to construction)."

Unit	Use	Floor Area (sq m)	Standard	Max. No. Spaces
1	Dentist	72	1.5 per consulting room	4.5
2	Medical	210	1.5 per consulting room	13.5
3	Bicycle Repair and Sales	81	1 per 35 sq m	2.3
4	Class 1 / Class 2 Commercial	64	1 per 25 sq m	2.6
5	Off Licence	64	1 per 25 sq m	2.6

Unit	Use	Floor Area (sq m)	Standard	Max. No. Spaces
6	Retail	71	1 per 25 sq m	2.0
7	Bar	151	1 per 40 sq m	3.8
8	Class 1 / Class 2 Commercial	101	1 per 25 sq m	4.0
9	Café	87	1 per 20 sq m GFA	4.4
10	Class 1 / Class 2 Commercial	89	1 per 25 sq m	3.6
11	Crèche	350	0.5 per classroom	2.5
12	Pharmacy	195	1 per 25 sq m	7.8
13	Beauty/Health Salon	195	1 per 35 sq m	5.6
14	Retail	134	1 per 25 sq m	5.4
15	Class 1 / Class 2 Commercial	133	1 per 25 sq m	5.3
16	Retail	57	1 per 25 sq m	2.3
17	Retail	69	1 per 25 sq m	2.8
Total		2,123		74.8³²

Table 7.13: Maximum Non-Residential Parking Standards for Zone 2 based on the mix of uses

Source: *South Dublin County Development Plan 2022-2028* and Thornton O'Connor Town Planning (2025)

As is indicated in Table 7.13 above, based on the Development Plans 'Zone 2' standards, the proposed development *could* provide a maximum of 74.8 No. non-residential car parking spaces. However, the approach for the development has been to provide no dedicated parking for the proposed non-residential uses. The Applicant and Design Team contend that this is an appropriate approach for the following reasons:

- The subject site is zoned 'TC – Town Centre' and intended for higher intensities and densities of development, where a broader range of uses are sought, and access can be achieved via active (and public) modes of transport.
- The site's highly accessible location, with frequent bus services and the Tallaght Luas Stop just a short walk away, ensures that future residents and visitors can conveniently and reliably commute to and from the development.
- The abundance of amenities in the surrounding area, including shops, restaurants, schools, and recreational facilities, reduces the need for car travel, supporting a lower parking provision while promoting walking, cycling, and public transport use.
- The abundance of existing parking available within a short walking distance of the site allows visitors to conveniently access both the development and nearby amenities without the need for on-site parking, facilitating multi-purpose trips.
- Block A, comprising 25% of all units, consists wholly of 'senior living' units, where demand for parking spaces is expected to be lower, as older residents are less likely to own or frequently use a car.

³² Assumes 3 No. consulting rooms for the Dentist, 9 No. consulting rooms for the Medical, applied the 'Retail Comparison' maximum of 1 per 35 sq m to Beauty/Health Salon as no standard is set for same in the Development Plan and 5 No. classrooms / care rooms in the crèche.

- National planning policy's support for reduced car parking – NPO 10 of the *First Revision to the National Planning Framework* states:

"Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high-capacity public transport and located within or adjacent to the built up area of the five cities or a metropolitan town."

This reflects a clear contemporary shift in national policy towards promoting TOD and reducing car parking in favour of more sustainable transportation alternatives and their integration with mixed land-uses.

- Local Planning Policy support for reduced car parking – SM7 Objective 2 of the Development Plan states: *"To limit the availability of workplace parking in urban centres to discourage car commuting, where alternative transport options are available."*

This approach is progressive and aligns with the pursuit of the '15-minute city' concept. Additionally, we note the commentary in the *LRD Opinion* in respect of the zero car parking strategy for the non-residential use:

"...having regard to the highly accessible nature of the application site by foot, public transport (both planned and existing) and the volume of public parking available within walking distance of this site, it is accepted that a zero parking rate for the non-residential uses is acceptable in this particular instance."

7.11.1.3 EV Charging and Accessible Parking Spaces

Regarding electric vehicle (EV) charging, the Development Plan states that EV charging shall be provided in all residential, mixed use and commercial development and shall comprise a minimum of 20% of the total parking spaces provided. Thus, it is confirmed that 20% of all spaces (12 No.) will be fitted with EV charging infrastructure in accordance with the Development Plan. The remaining spaces will be ducted to accommodate upgrade to full EV charging status.

Accessible parking spaces have also been considered and feature as 3 No. spaces, or 5% of the car parking total.

7.11.2 Cycle Parking

7.11.2.1 Residential Cycle Parking

Cycle parking for the residential uses will accord with the minimum standards set by SPPR 4 (Cycle Parking and Storage) of the Compact Settlements Guidelines:

It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.

The following requirements for cycle parking and storage are recommended:

- (i) *Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.*
- (ii) *Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.*

This equates to 1 No. space per bedroom for residents. The visitor parking provision is not quantitatively defined; however, we have applied the standard of 1 No. space per 2 No. units as previously prescribed by the previous iteration of the Apartment Design Guidelines (2023). Based on the proposed unit mix (Section 7.5) **this equates to a requirement for 393 No. cycle parking spaces for residents and 100 No. spaces for visitors (Table 7.14).**

		Studio	1-bed	2-bed	3-bed	Total
No. Units	Block A	0	23	26	0	49
	Block B	6	24	72	48	150
	Total	6	47	98	48	199
Cycle Parking Standard	Resident (Spaces per Unit)	1	1	2	3	-
	Visitor Cycle Parking Standard	0.5	0.5	0.5	0.5	-
Cycle Parking Requirement	Resident (Spaces per Unit)	6	47	196	144	393
	Visitor Cycle Parking Standard	3	23.5	49	24	99.5
	Total	9	70.5	245	168	492.5

Table 7.14: Cycle parking standards and requirements for residents of the proposed development

Source: *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024)* and *Thornton O'Connor Town Planning (2025)*

7.11.2.2 Non-Residential Cycle Parking

With respect to cycle parking for the non-residential uses, it is noted that different standards apply for different uses. Table 12.23 of the Development Plan defines these and we combine them with the proposed used to calculate the minimum requirement for the scheme in Table 7.15 below. As is shown, 17 No. long-stay and 42 No. short-stay spaces are proposed³³.

³³ Assumes 3 No. consulting rooms for the Dentist, 9 No. consulting rooms for the Medical, applied the 1 per 50 sq m retail standard to the Beauty/Health Salon as no standard is set for same in the Development Plan, 5 No. classrooms / care rooms in the crèche and applied retail 1 per 50 sq m standard to the Class 1 / Class 2 Commercial uses.

Unit	Use	Floor Area (sq m)	Long Stay Standard	Long Stay Requirement	Short Stay Standard	Short Stay Requirement	Note
1	Dentist	72	1 per 5 staff	0.8	0.5 per consult room	1.5	Assumes 3 No. consulting rooms with 1 staff in each, plus 1 admin staff
2	Medical	210	1 per 5 staff	2.0	0.5 per consult room	4.5	Assumes 9 No. consulting rooms with 1 staff in each, plus 1 admin staff
3	Bicycle Repair and Sales	81	1 per 5 staff	0.6	1 per 50 sq m	1.6	70% gross area as net, 1 No. staff per 20 sq m net
4	Class 1 / Class 2 Commercial	64	1 per 5 staff	0.4	1 per 50 sq m	1.3	70% gross area as net, 1 No. staff per 20 sq m net
5	Off Licence	64	1 per 5 staff	0.4	1 per 50 sq m	1.3	70% gross area as net, 1 No. staff per 20 sq m net
6	Retail	71	1 per 5 staff	0.5	1 per 50 sq m	1.4	70% gross area as net, 1 No. staff per 20 sq m net
7	Bar	151	1 per 5 staff	1.1	1 per 150 sq m GFA	1.0	70% gross area as net, 1 No. staff per 20 sq m net
8	Class 1 / Class 2 Commercial	101	1 per 5 staff	0.7	1 per 50 sq m	2.0	70% gross area as net, 1 No. staff per 20 sq m net
9	Café	87	1 per 5 staff	0.6	1 per 10 seats	2.9	70% gross as net and 1 No. staff per 20 sq m net, assumes 1 No. seat per 3 sq m
10	Class 1 / Class 2 Commercial	89	1 per 5 staff	0.6	1 per 50 sq m	1.8	70% gross area as net, 1 No. staff per 20 sq m net
11	Crèche	350	1 per 5 staff	3.0	1 per 10 child	7.0	Assumes 15 staff (14 for care + 1 admin) and 70 children
12	Pharmacy	195	1 per 5 staff	1.4	1 per 50 sqm	3.9	70% gross area as net, 1 No. staff per 20 sq m net
13	Beauty/Health Salon	195	1 per 5 staff	2.0	1 per 50 sq m	3.9	Assumes 10 staff, no specific standard set by CDP so retail used
14	Retail	134	1 per 5 staff	0.9	1 per 50 sq m	2.7	70% gross area as net, 1 No. staff per 20 sq m net
15	Class 1 / Class 2 Commercial	133	1 per 5 staff	0.9	1 per 50 sq m	2.7	70% gross area as net, 1 No. staff per 20 sq m net
16	Retail	57	1 per 5 staff	0.4	1 per 50 sq m	1.1	70% gross area as net, 1 No. staff per 20 sq m net
17	Retail	69	1 per 5 staff	0.5	1 per 50 sq m	1.4	70% gross area as net, 1 No. staff per 20 sq m net
Total				16.9		42.0	
Rounded Total				17		42.0	

Table 7.15: Cycle parking standards and requirements for non-residential uses of the proposed development

Source: South Dublin County Development Plan 2022-2028 and Thornton O'Connor Town Planning (2025)

With regards to the foregoing, the proposed development will require a minimum of 64 No. cycle parking spaces for the non-residential units.

7.11.2.3 Proposed Cycle Parking

The development proposes 557 No. cycle parking spaces (including 5 No. cargo spaces), with 412 No. as long-stay for residents and staff and 145 No. as short-stay for visitors and patrons (Table 7.15). This results in an exceedance of the required provision by 2 No. long-stay and 4 No. short-stay spaces.

Required	Long Stay	Short Stay	Total
Residential	393	100	493
Non-Residential	17	42	59
Total	410	142	552

Provided	Long Stay	Short Stay	Total
Residential	412	145	557
Non-Residential			
Total	412	145	557

Variance	Long Stay	Short Stay	Total
Residential	2	4	6
Non-Residential			
Total	2	4	6

Table 7.16: Required, provided and exceed cycle parking for the proposed uses

Source: *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024), South Dublin County Development Plan 2022-2028 and Thornton O'Connor Town Planning (2025)*

The location of the cycle spaces are dispersed throughout the development for ease and accessibility of residents, visitors, staff and patrons. It should be noted that all long-stay cycle parking spaces are provided in secure and covered storage facilities. Short-stay spaces are provided as Sheffield stands at street level and benefit from passive surveillance in all instances. Please see the accompanying drawings prepared by DT and Studio Glasú for specific cycle parking details and layouts.

7.12 Operational Waste and Servicing

As a mixed-use development at an infill, town centre site, it is important to ensure that the management of waste upon and servicing of the scheme upon its occupation and operation is carefully considered. This is to reduce waste generation, to avoid disruption and traffic hazard and to optimise overall property management.

With respect to waste management, we principally direct the Council to the enclosed *Operational Waste Management Plan* prepared by AWN. This ensures compliance with a suite of policies and objectives in the Development Plan, including:

Policy IE7: Waste Management – *“Implement European Union, National and Regional waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes.”*

IE7 Objective 1 – *“To encourage a just transition from a waste management economy to a green circular economy to enhance employment and increase the value, recovery and recirculation of resources through compliance with the provisions of the Waste Action Plan for a Circular Economy 2020 – 2025 and to promote the use of, but not limited to, reverse vending machines and deposit return schemes or similar to ensure a wider and varying ways of recycling.”*

IE7 Objective 7 – *“To require the appropriate provision for the sustainable management of waste within all developments, ensuring it is suitably designed into the development, including the provision of facilities for the storage, separation and collection of such waste.”*

EDE2 Objective 4 – *“To support the measures in South Dublin’s Climate Change Action Plan (2019- 2024), or any superseding plan, to integrate the Circular Economy approach with economic development initiatives, in order to optimise opportunities in design and operation to reduce energy and material consumption and recycling of materials in support of sustainable development.”*

The *Operational Waste Management Plan* is prepared with consideration given to each of the individual uses, recognising the need to appropriately manage, store, dispose of and collect the various different waste streams. The plan also prescribes strategies to minimise waste, encourage reuse and to facilitate recycling, and accords with Section 12.11.3(ii) of the Development Plan.

With respect to the servicing and operation of the proposed development we refer the Council to the *Service & Operational Waste Management Plan* prepared by NRB and included as Appendix O to their *Traffic and Transport Assessment Report*. The main consideration in the report is the safe and efficient utilisation of the one-way servicing lane to the south of proposed Block A. To avoid duplication of text, we direct the Council to Section 3 of the plan, and Section 3.3 in particular, which emphasises the intend sequencing/booking of deliveries, presence of on-site management, switching off of vehicle engines upon delivery, management controlled access, etc.

7.13 Ecology and the Environment

The increasing importance of ecological and environmental protection has meant that they have been considered throughout the design process. In light of same, DNV has prepared an *Ecological Impact Assessment Report*, an *Appropriate Assessment Screening Report* and an *EIA [Environmental Impact Assessment] Screening Report*.

Whilst we direct the Council to review these individual reports, we have provided summaries and key concluding extracts below.

7.13.1 Ecology

With respect to ecology on-site, DNV has prepared an *Ecological Impact Assessment*. Although we direct the Council to this separate report – with the benefit of a suite of

construction and demolition avoidance, mitigation, compensation and enhancement measures – DNV proceeded to conclude that:

"It is considered that, provided the mitigation measures proposed within this report together with all best practice development standards as outlined in the CEMP [Construction Environmental Management Plan] are carried out in full, there will be no significant negative impact to any KER [Key Ecological Receptors] habitat, species group or biodiversity as a result of the Proposed Development."

Additionally, the landscaping plan for the Proposed Development will increase the vegetation cover on Site and will further enhance the area to create ecological connectivity throughout and within the wider landscape via an ecological stepping stone."

7.13.2 Natura 2000 Sites

As noted above, DNV has prepared an *Appropriate Assessment Screening Report* in respect of the proposed development at the subject site. This is to ensure protection of designated sites and to demonstrate compliance with Development Plan policies and objectives such as NCBH₃ Objective 3:

"To ensure that planning permission will only be granted for a development proposal that, either individually or in combination with existing and / or proposed plans or projects, will not have a significant adverse effect on a European Site, or where such a development proposal is likely or might have such a significant adverse effect (either alone or in combination), the planning authority will, as required by law, carry out an appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92 / 43 / EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the development proposal will not adversely affect the integrity of any European site, will the planning authority agree to the development and impose appropriate mitigation measures in the form of planning conditions. A development proposal which could adversely affect the integrity of a European site may only be permitted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation."

The *Appropriate Assessment Screening Report* concluded the following:

"The Proposed Development on lands at Belgard Square East, Belgard Road and Old Blessington Road, Tallaght, Dublin 24, has been assessed considering:

- *The nature, size and location of the Proposed Development and possible impacts arising from the Construction and/or Operational Phase.*
- *The QIs/SCIs and conservation objectives of the European sites.*
- *The potential for in-combination effects arising from other plans and projects.*

In carrying out this AA screening, ecology specific mitigation measures have not been accounted for. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been considered.

*In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:*

- North Dublin Bay SAC (000206).
- South Dublin Bay SAC (000210).
- South Dublin Bay and River Tolka Estuary SPA (004024).
- North Bull Island SPA (004006).
- North-West Irish Sea SPA (004236).

In carrying out this AA screening, mitigation measures have not been taken into account. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.

On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above-listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites' conservation objectives. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of an NIS is not required." [emphasis original]

7.13.3 Environmental Impact

With respect to environmental impacts, DNV has undertaken a detailed screening exercise in the enclosed *EIA Screening Report*. This report is available for inspection under separate cover and aids the Council in the undertaking of their own screening exercises, per Section 12.3.3 of the Development Plan. The report concludes:

"The Proposed Development has been assessed in accordance with the screening criteria set out in Annex III of the European Union 'EIA Directive' and in accordance with the national legislation transposing same, including the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended). It has also been assessed based on Schedule 7 to the Planning and Development Regulations, 2001 as amended. Within Schedule 7A, information to be provided by the Developer for the purposes of screening subthreshold development for EIA is set out. The Proposed Development has been assessed in accordance with this information.

Based on the assessment carried out in the appropriate sections of this Screening Report, it can be concluded that the Proposed Development will not have significant effects on the environment during both the construction and operational phases.

*Having regard to the nature and scale of the Proposed Development on an urban site served by public infrastructure, and the absence of any significant environmental sensitivities in the area, it is concluded that, by reason of the nature, scale and location of the subject site, the Proposed Development **would not be likely to have significant effects on the environment** and a mandatory Environmental Impact Assessment Report (EIAR) is not required for the Proposed Development." [emphasis added]*

7.14 Part V

To comply with the Part V requirements of the *Planning and Development Act 2000* (as amended), we firstly note that the subject site was purchased on 19th February 2021 (see enclosed letter). Therefore, the 10% Part V contribution applies. Consequently, a total of 20

No. units (10%) are proposed to for provision. These include 10 No. 1-bed and 10 No. 2-bed units.

Please also refer to the *Proposed Part V Units* drawing prepared by DT and the costings in the *Part V Proposal* document prepared by MMP.

8.0 PLANNING ADMINISTRATION

The following plans and particulars are enclosed as part of this Planning Application.

Planning Fee

- The Planning Application Fee has been calculated in accordance with the *Planning and Development (Large-scale Residential Development Fees) Regulations 2021*:
 - 199 No. units x €130 per unit = €25,870.00
 - 2,123 sq m of non-residential floorspace x €7.20 = €15,285.60
 - **Total = €41,155.60**
- This was paid to the Council via Electronic Fund Transfer on 12th November 2025 (see Appendix A below).

Application Form

- The *Planning Application Form* is auto-generated by the online system.
- *LRD Application Form (Form 19)*

Letter of Authorisation to Lodge

- Letter from Midsal Homes Limited authorisation Thornton O'Connor Town Planning to lodge this Planning Application on their behalf.

Letters of Consent

- Letter from Ravensbrook Limited in Receivership by Kirby Healy Chartered Accountants consenting to the Applicant pursuing a Planning Application for development on lands in their ownership/control.
- Letter from South Dublin County Council consenting to the Applicant pursuing a Planning Application for development on lands in their ownership/control.

Site Notice

- A copy of the *Site Notice*, dated and erected at 4 No. locations at the site on Tuesday, 18th September 2025.

Newspaper Notice

- A copy of the *Newspaper Notice*, published in the Irish Daily Star on Wednesday, 19th September 2025.

Planning

- This *Planning Report and Statement of Consistency*, prepared by Thornton O'Connor Town Planning.
- The *Statement of Response to LRD Opinion*, prepared by Thornton O'Connor Town Planning.

Part V

- Letter confirming the date of purchase of the subject site as 19th February 2021, prepared by Dillon Eustace.
- *Part V Proposal* prepared by Mulcahy McDonagh & Partners.
- (Please also see DT's *Proposed Part V Units* drawing for details of the identified units proposed to meet Part V obligations.)

Architecture

- The *Architectural Design Statement*, prepared by Donnelly Turpin Architects, dated November 2025. The document includes the following as appendices:
 - *A Schedule of Accommodation*, as Appendix A.
 - *A Schedule of Commercial Areas*, as Appendix B.
 - *A Compliance Schedule*, as Appendix C.
 - *CGI's*
- The following drawings prepared by prepared by Donnelly Turpin Architects.

Drawing No.	Drawing Title	Scale	Size
P01_01	Site Location Map	1:1000	A1
P01_02	Existing Site Layout Plan	1:500	A1
P01_03	Proposed Site Layout Plan	1:500	A1
P01_04	Taking in Charge Site Plan	1:500	A1
P01_05	Proposed External Area Uses Site Plan	1:500	A1
P02_01	Existing Ground Floor Plan And Demolition Plan	1:200	A1
P02_02	Existing Elevations: North, West And East	1:200	A1
P02_03	Existing Contextual Elevations	1:500	A1
P03_00	Proposed Basement Plan	1:200	A1
P03_01	Proposed Ground Floor Plan	1:200	A1
P03_02	Proposed Mezzanine Floor Plan	1:200	A1
P03_03	Proposed First Floor Plan	1:200	A1
P03_04	Proposed Second Floor Plan	1:200	A1
P03_05	Proposed Third Floor Plan	1:200	A1
P03_06	Proposed Fourth Floor Plan	1:200	A1
P03_07	Proposed Fifth Floor Plan	1:200	A1
P03_08	Proposed Sixth Floor Plan	1:200	A1

Drawing No.	Drawing Title	Scale	Size
P03_09	Proposed Roof Plan	1:200	A1
P03_10	Proposed Contextual Elevations	1:500	A1
P03_11	Proposed East And West Elevations	1:200	A1
P03_12	Proposed North and West Elevations	1:200	A1
P03_13	Proposed Sections A-A and B-B	1:200	A1
P03_14	Proposed Sections C-C and D-D	1:200	A1
P03_15	Proposed Sections E-E and F-F	1:200	A1
P03_16	Proposed Sections G-G and H-H	1:200	A1
P03_17	Proposed Detail Sections J-J and K-K	1:50	A1
P03_18	Proposed Detail Sections L-L and M-M	1:50	A1
P03_19	Proposed Apt. Types A-1A, A-1B, A-1C, A-1D	1:50	A1
P03_20	Proposed Apt. Types A-2A, A-2B	1:50	A1
P03_21	Proposed Apt. Types A-2C, A-2D	1:50	A1
P03_22	Proposed Apt. Types A-2E, A-2F, A-2G	1:50	A1
P03_23	Proposed Apt. Types B-1A, B-1B, B-SA	1:50	A1
P03_24	Proposed Apt. Types B-2A, B-2B	1:50	A1
P03_25	Proposed Apt. Types B-2C, B-2D	1:50	A1
P03_26	Proposed Apt. Types B-3A, B-3B	1:50	A1
P03_27	Proposed Apt. Type B-3C	1:50	A1
P03_28	Proposed Apt. Type B-3D, B-3E	1:50	A1
P03_29	Proposed Apartment Types Key Plan	1:500	A1
P03_30	Proposed Part V Units	1:500	A1
P03_31	Proposed Dual Aspect Units	1:500	A1
P03_32	Proposed Privacy Screens	1:50	A1

Civil Engineering

- The *Flood Risk Assessment Report* prepared by Torque Consulting Engineers, dated 7th November 2025.
- The *Engineering Services Report* prepared by Torque Consulting Engineers, dated 6th November 2025.
- The *Confirmation of Feasibility* by Uisce Éireann, dated November 2025.
 - The following drawings prepared by Torque Consulting Engineers:

Drawing No.	Drawing Title	Scale	Size
S058-TCE-B1-ZZ-DR-S-S-500	Site Drainage – Surface Water Drainage Plan	1:250	A1
S058-TCE-B1-ZZ-DR-S-S-501	Site Drainage – Foul Drainage Plan	1:250	A1
S058-TCE-B1-ZZ-DR-S-S-502	Site Drainage – Proposed Watermain Connection	1:250	A1
S058-TCE-B1-ZZ-DR-S-S-504	SUDS Masterplan	1:250	A1
S058-TCE-B1-ZZ-DR-S-S-505	Site Drainage – Proposed Details Sheet 1	As shown	A1
S058-TCE-B1-ZZ-DR-S-S-506	Site Drainage – Proposed Details Sheet 2	As shown	A1

Drawing No.	Drawing Title	Scale	Size
S058-TCE-B1-ZZ-DR-S-S-508	Surface Water Conveyance Plan	1:250	A1
S058-TCE-B1-ZZ-DR-S-S-509	Surface Water Flow Route Plan	As shown	A1
S058-TCE-B1-ZZ-DR-S-S-510	Site Drainage - Extensive Green/Blue Roof Details	As shown	A1
S058-TCE-B1-ZZ-DR-C-520	SW Drainage Sections A-A & B-B	1:75	A1
S058-TCE-B1-ZZ-DR-S-S-601	Site Drainage - Existing Service	1:250	A1
S058-TCE-B1-ZZ-DR-S-S-602	Site Drainage - Decommissioned Existing Services	1:250	A1
S058-TCE-B1-ZZ-DR-S-S-603	Site Drainage – Water Main Diversion	1:250	A1
S058-TCE-B1-ZZ-DR-S-S-611	Foul Sewer Details- Existing Services	As Shown	A1
S058-TCE-B1-ZZ-DR-S-S-621	Watermain Details - Sheet 01 of 05	NTS	A1
S058-TCE-B1-ZZ-DR-S-S-622	Watermain Details - Sheet 02 of 05	NTS	A1
S058-TCE-B1-ZZ-DR-S-S-623	Watermain Details - Sheet 03 of 05	NTS	A1
S058-TCE-B1-ZZ-DR-S-S-624	Watermain Details - Sheet 04 of 05	NTS	A1
S058-TCE-B1-ZZ-DR-S-S-625	Watermain Details - Sheet 05 of 05	NTS	A1

Traffic and Transport Engineering

- The *Traffic & Transport Assessment Report* prepared by NRB Consulting Engineers. This Report includes:
 - *Mobility Management Plan,*
 - *Car & Bicycle Parking Management Plan,*
 - *DMURS Design Compliance Statement Technical Note,*
 - *Public Transport Capacity Assessment Report,*
 - *Service & Operational Waste Management Plan,*
 - *Outline Construction Traffic Management Plan,*
 - Stage 1 Road Safety Audit (prepared by Bruton Consulting Engineers),
 - The following drawings which are appended to the report.

Drawing No.	Drawing Title	Scale	Size
NRB-TA-001	Proposed Site Layout	1:500	A3
NRB-TA-002	Proposed Site Access and Sight Lines	1:500	A3
NRB-TA-003	Proposed Zebra Crossing on Belgard Square East	1:200	A3
NRB-TA-004	Proposed Zebra Crossing on Belgard Road	1:200	A3
NRB-TA-005	AutoTRACKs of a Refuse Vehicle Entering and Exiting Main Car Park	1:200	A3
NRB-TA-006	AutoTRACKs of a Refuse Vehicle and a Delivery Van	1:500	A3
NRB-TA-007	AutoTRACKs of a Fire Tender Traversing the Site	1:500	A3
NRB-TA-008	AutoTRACKs of a Fire Tender Traversing the Site	1:500	A3
NRB-TA-009	Proposed Site Layout Plan with Bus Connects	1:500	A3

Mechanical & Electrical Engineering

- The *Outdoor Lighting Report* prepared by Renaissance Engineering in conjunction with Veelite Lighting Ltd., dated 6th November 2025.
- The *Energy Efficiency and Climate Change Adaptation Design Statement* prepared by Renaissance Engineering, dated 17th November 2025.
- The following drawings prepared by prepared by Renaissance Engineering:

Drawing No.	Drawing Title	Scale	Size
24242-REN-XX-GF-DR-E-6300	Lighting Services- Ground Floor -Site	As indicated	Ao
24242-REN-XX-01-DR-E-6300	Lighting Services -First Floor -Site	As indicated	Ao

Arboriculture

- The *Arboricultural Report* prepared by The Tree File, November 2025.
- The following drawings prepared by The Tree File:

Drawing Title	Scale	Size
Belgard Square Tree Constraints Plan	1:500	A1
Belgard Square Tree Impacts Plan	1:500	A1
Belgard Square Tree Protection Plan	1:500	A1

Landscape Architecture

- The *Landscape Strategy* prepared by Glasú Landscape Architecture, dated 28th October 2025.
- The following drawings prepared by Studio Glasú Landscape Architecture:

Drawing No.	Drawing Title	Scale	Size
DWG.01	Landscape Masterplan	1:250	A1
DWG.21	Landscape Detail Area One Street	1:175	A1
DWG.22	Landscape Detail Area Two Podium	1:100	A1
DWG.23	Landscape Detail Area Three Playspace	1:75	A2
DWG.31	Landscape Sections One	1:50	A1
DWG.32	Landscape Sections Two	1:75	A1

Environmental & Ecology

- The *Appropriate Assessment Screening Report* prepared by DNV Synergy Environmental Limited, dated November 2025.
- The *Ecological Impact Assessment Report* prepared by DNV Synergy Environmental Limited, dated November 2025.

- The *Environmental Impact Assessment Screening Report* prepared by DNV Synergy Environmental Limited, dated March.
- The *Statement in accordance with Article 103(1A)a of the Planning and Development Regulations 2001, as amended* prepared by DNV Synergy Environmental Limited, dated November 2025.

Waste Management

- The *Construction Environmental Management Plan* prepared by AWN Consulting, dated November 2025.
- The *Operational Waste Management Plan* prepared by AWN Consulting, dated November 2025.
- The *Resource and Waste Management Plan* prepared by AWN Consulting, dated November 2025.

Daylight & Sunlight

- The *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau, dated November 2025.

Visual Impact

- The *Townscape and Visual Impact Assessment* prepared by Purser, dated 13th November 2025.

Noise

- The *Acoustic Design Statement* prepared by Wave Dynamics Acoustic Consultants, dated 3rd November 2025.

Telecommunications

- The *Telecommunications Report* prepared by Independent Site Management, dated October 2025.

Visuals

- The *Verified Views, Aerials and CGI* prepared by 3D Design Bureau, dated November 2025.

Aviation

- The *Aeronautical Assessment Report* prepared by O'Dwyer & Jones Aviation Planning & Architecture Consultants, dated August 2025.

Glint and Glare

- The *Glint and Glare Assessment Report* prepared by Lawler Sustainability, dated November 2025.

Archaeology

- The *Archaeological Assessment* prepared by IAC Archaeology, dated October 2025.

Building Lifecycle

- The *Building Lifecycle Report*, prepared by Thornton O'Connor Town Planning, dated November 2025.

Social Infrastructure Audit

- The *Social Infrastructure Audit*, prepared by Thornton O'Connor Town Planning, dated November 2025.

9.0 CONCLUSION

Overall, it is considered that the proposal is an appropriate and attractively designed development at the subject site, with modulation provided throughout the scheme to reflect and respect its surrounding context. Importantly, it will bring a prominently located, underutilised, infill site that currently fails to provide economic, environmental/ecological or architectural/aesthetic benefits back into more appropriate and sustainable use.

The proposed development will provide critically needed housing and a range of uses to support enterprise and employment generation. Additionally, social and community needs will be met by way of the inclusion of the crèche, the dental practice, the medical centre and the pharmacy. These uses and the scheme's built-form will ensure that the overall development successfully assimilates into the surrounding context.

The proposed development, which has been well considered by a highly experienced Design Team and designed to accord with national, regional, and local planning policy, will provide a high-quality living environment that provides opportunities for social interaction amongst future residents and the wider community.

Informed by the foregoing, it is considered that the proposed development represents the proper planning and sustainable development of the area.

We trust that the detail provided in this report and the enclosed supporting materials provide the Council with sufficient information to Grant Planning Permission for the proposed development. Should you require additional insights, please do not hesitate to contact the undersigned.

Yours faithfully,



Daniel Moody
Associate
Thornton O'Connor Town Planning

APPENDIX A – PROOF OF PAYMENT OF PLANNING FEE



Payment Confirmation

Payment details

Amount	EUR 41,155.60
My statement message	South Dublin Co Co
Payee message	Midsal Homes Ltd
Additional information for payee	Belgard Square East LRD
Payment option	Standard
AIB reference no	0ME67H0820QPD3LU
Payment status	Completed
Date	12/11/2025
Fee CCY	EUR
AIB fee	0.00
AIB fees paid by	You
Other fees paid by	Payee

Payer details

Name	MIDSAL HOMES
Currency	EUR
Account	[REDACTED]

Payee details

Name	South Dublin County Council General No. 1 Account
Account	[REDACTED]
Payee address	[REDACTED]
Payee bank details	[REDACTED]
	Ireland
