
Statement of Response to Pre-application Consultation Opinion

Build-to-Rent' Housing Development

**Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate,
Tallaght, Dublin 24**

Steelworks Property Developments Limited

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1.0 Introduction

Hughes Planning and Development Consultants, 70 Pearse Street, Dublin 2, have prepared this Statement of Response to Pre-application Consultation Opinion on behalf of our client, Steelworks Property Development Limited, to accompany a planning application to An Bord Pleanála for a proposed Strategic Housing Development at Units 66 & 76 Fourth Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24. Following consultations with South Dublin County Council, a request to enter into pre-planning consultations with An Bord Pleanála was submitted and a pre-planning consultation meeting was facilitated on 26th June 2019.

An Bord Pleanála subsequently issued a Notice of Pre-Application Consultation Opinion on 11th July 2019, which identified 6 no. items to be addressed, in order for the application to constitute the reasonable basis for a Strategic Housing Application (discussed in detail in the subsequent sections).

The Board also requested, pursuant to article 285(5)(b) of the Planning and Development Act 2000 (As amended by the Residential Tenancies Act 2016), the provision of the following specific information:

1. *Photomontages and cross sections at appropriate intervals for the proposed development including how the development will interface with existing streets and contiguous lands. In this regard, due consideration should also be given to recently permitted residential and road development not yet constructed.*
2. *Daylight/Sunlight analysis, showing an acceptable level of residential amenity for future occupiers of the proposed development, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development.*
3. *A revised Traffic Impact Assessment report which addresses concerns raised by the planning authority regarding inter alia, access to car parks, roads layout, public transport capacity, car parking rationale and planned roads. A rationale justifying any reduction in car parking spaces should also be submitted in the context of the Sustainable Urban Housing guidelines and advice on Build to Rent schemes.*
4. *Additional water and waste water details to address matters raised in the planning authority's opinion dated 6 June 2019 in particular the Water Services Department's comments and consideration of the provisions of appropriate SuDS measures and attenuation calculations.*
5. *Construction and Demolition Waste Management Plan.*
6. *A proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains in use as Build to Rent accommodation. There shall be a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residents units are sold or rented separately for that period (Your attention is drawn to the provisions of Specific Planning Policy Requirement 7 of the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2018).*
7. *The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.*

Sections 2.0 and 3.0 overleaf provide a response to the above.

Further to the above, the Board's Notice of Pre-Application Consultation Opinion set out the statutory bodies to be notified of the making an application, pursuant to section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016. They are as follows:

1. Irish Water
2. National Transport Authority
3. Transport Infrastructure Ireland
4. Irish Aviation Authority
5. Department of Defence
6. Commission for Railway Regulation
7. South Dublin Childcare Committee

A copy of the current application has been sent to the prescribed bodies identified by the Board. Copies of the applicable cover letters are enclosed with the application.

2.0 Response to Issues Raised

The following sets out how the applicant and design team have addressed the 6 no. issues raised in the Board's Notice of Pre-Application Consultation Opinion to ensure the subject application constitutes a reasonable basis for an application for strategic housing development.

2.1 Item No. 1 – Height, Density and Unit Mix

The Board required the following in relation to the height, density and unit mix proposed for the development:

'Further consideration of the documents as they relate to height and residential density. In this regard, a planning rationale/justification for the height and residential density proposed should be submitted which has due regard to inter alia, the local and national planning policy context. Specifically, the prospective applicant must be absolutely satisfied that the development would not conflict with emerging local policy guidelines in terms of any proposed Local Area Plan. The prospective applicant should also provide a reasoned rationale for the proposed building height, taking into account the pattern of existing and permitted residential developments in the area and the zoning objective and permitted densities pertaining to such lands and how the proposed development of the scale proposed would be successfully assimilated into the area, now and in the future. A planning rationale/justification for the proposed unit type/mix should be submitted which includes a housing assessment report that considered existing and recently permitted developments in the Tallaght area including tenure, unit type and mix. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.'

2.1.1 Applicants Response to Item No. 1

Planning rationale/justification for the unit type/mix, height and residential density proposed, as well as an assessment of subject proposal's consistency with local and national planning policy context including the recently adopted Tallaght Town Centre Local Area Plan 2020-2026, is included in the Statement of Consistency & Planning Report (more specifically Section 7), prepared by Hughes Planning and Development Consultants, which accompanies this application. A Material Contravention Statement, prepared by Hughes Planning and Development Consultants, which justifies the aspects of the development (plot ratio, unit mix and tenancy mix) which require a variation of the Tallaght Town Centre Local Area Plan 2020-2026 also accompanies the subject application.

2.2 Item No. 2 – Proposed Road Improvements in Area

The Board required the following in relation to the proposed road improvements in the area:

'Further consideration of the documents as they relate to planned roads improvements in the area. Specifically, prospective applicant is advised to illustrate all new and planned road infrastructure as it relates to both subject sites (A and B) and how the proposed development will integrate and/or facilitate these proposals. The prospective applicant should be satisfied that the proposed development is not premature pending the delivery of such road infrastructure. The prospective applicant should demonstrate that the proposed development would not prejudice any stated objectives of the

planning authority to deliver new roads and increase the prospect of vehicular connections to and from Cookstown, Airton Road and Belgard Square North or limit the possibility of land acquisition for proposals led by the Local Authority. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.'

2.2.1 Applicants Response to Item No. 2

Following receipt of the Boards Notice of Pre-Application Consultation Opinion on 11th July 2019, the design team re-examined the development in the context of planned roads in the vicinity of the subject sites. Upon review, it was decided that development of Site B (Units 69 & 70 Cookstown Estate Road, Cookstown Industrial Estate) at this time would be premature given the uncertainty surrounding the delivery/layout of the proposed Airton Link Road. Therefore, it was decided to omit Site B from this SHD planning application. An application will be made in relation to Site B at a later date after a strategy for the delivery of the proposed Airton Link Road has been established.

Thus, the subject site comprises Site A (Units 66 and 67 Forth Avenue Cookstown Industrial Estate) as identified in the pre-planning submission and in this application and also includes a 0.39 Ha parcel of South Dublin County Council land which comprises part of the Cookstown Road and part of Fourth Avenue. The subject proposal includes road, junction and streetscape upgrades along these sections of Cookstown Road and Fourth Avenue, including introduction of a signalised junction where the roundabout now features, continuation of the cycle and pedestrian infrastructures featuring on the Cookstown Road Extension and removal of the high kerbs currently featuring on existing footpaths in the area. These road, junction and streetscape upgrades will integrate with the recently completed Cookstown Road Extension, help to achieve the road and street layout outlined in the Tallaght Town Centre Local Area Plan 2020-2026 and create a residential streetscape in this area. It is also worth noting that the signalised junction being introduced has been designed having regard to the proposed Airton Link Road proposals for which are currently being advanced. During preparation of the subject application, the design team have had numerous discussions with South Dublin County Council officials regarding this aspect of the proposal and we understand they have no objections to the road, junction and street upgrade proposals incorporated in the proposal.

Please refer to the architectural drawing set (Drawings No. 001000 and 001600), prepared by C+W O'Brien Architects, and engineering drawings (included at Appendix A to the Transportation Assessment Report, prepared by NRB Consulting Engineers, for further information on the proposed road, junction and streetscape upgrades.

We consider that the changes outlined above appropriately address the issues outlined in Item No. 2 of An Bord Pleanála's Notice of Pre-Application Consultation Opinion.

2.3 Item No. 3 – Integration of Site with Surrounding Area

The Board required the following in relation to how the proposed development will Integrate with Surrounding Area:

'The pre-application consultation documentation has failed to provide an adequate amount of material to allow any meaningful assessment of site integration if submitted as a full planning application. No documentation has demonstrated how the development will successfully integrate with the character and amenities of the area, such as they are, or recently permitted development to the east. Further consideration should be given in relation to the design rationale/justification outlined in the documents as it relates to the integration of the proposed development with adjacent permitted and emerging development. Layout drawings should show recently permitted development to the east in the context ABP-303306-18 regarding the provision of a future vehicular and/or pedestrian route, position of apartment buildings and open space. In addition, contiguous elevations, levels and cross sections should show permitted development on those lands to the east. There should be a logical physical connectivity between the site and the site to the east, as a means of providing a usable pedestrian/cyclist route. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted.'

2.3.1 Applicants Response to Item No. 3

The proposed development considered at the pre-planning consultation meeting, on 26th June 2019, involved two parcels of land (identified as Site A and Site B) located adjacent to the intersection of Fourth Avenue and Cookstown Road, respectively. Site A (Units 66 & 67 Fourth Avenue) comprised an area of approximately 0.71 ha (1.75 acres) located to the south-west of the junction of Fourth Avenue and Cookstown Road. Site B (Units 69 & 70 Cookstown Estate Road) comprised an area of approximately 0.44 ha (1.08 acres) located to the south-east of the junction of Fourth Avenue and Cookstown Road. Site B was located immediately west of the development approved at Belgard House, Belgard Square and the former Uniphar factory, The junction of Belgard Road and Belgard Square North, Tallaght, Dublin 24, under ABP Ref. ABP-303306-18. As discussed in Section 2.2.1 of this report, Site B has been omitted from the subject application and will instead be the subject of a planning application at a later date. Site B's integration with the development recently permitted to the east, under ABP Ref. ABP-303306-18, will be taken into consideration when this proposal is being prepared as well as any further approvals that have occurred in the intervening period. This application will also include contiguous elevations, levels and cross sections showing permitted development on those lands to the east.

Following receipt of the Board's Notice of Pre- Application Consultation Opinion on 11th July 2019, the design team re-examined the proposal for Site A and how its design and layout integrates with the surrounding area. In response to the recently adopted Tallaght Town Centre Local Area Plan 2020-2026, more specifically the Overall Urban Structure outlined for 'The Centre' neighbourhood in Figure 3.3 and objectives outlined in Section 3.2, the following amendments were made to the development proposed at Site A:

- The application boundary was extended to include a 0.39 Ha parcel of South Dublin County Council land, comprising part of the Cookstown Road and part of Fourth Avenue, to facilitate road, junction and streetscape upgrades in this part of the Cookstown Industrial Estate;
- The development has been designed to tie in with the Cookstown Road Extension, and associated cycle and pedestrian paths, recently constructed adjacent to the site's eastern boundary; and
- The building's setback from the southern site boundary was increased to provide an appropriate interface with the strategic amenity route and South Dublin County Council Housing Scheme proposed to the south of the subject site.

Further to the above, the photomontages, prepared by 3D Design Bureau, and contextual elevations (Drawing No. 002005) and masterplan drawing featuring in the architectural drawing set and Architectural Design Statement (at page 23), prepared by C+W O'Brien Architects, which accompany this application illustrate how the proposed development will sit in the context of the development approved at Belgard House, Belgard Square and the former Uniphar factory, The junction of Belgard Road and Belgard Square North, Tallaght, Dublin 24, under ABP Ref. ABP-303306-18, and existing development in the surrounding area.

We consider that the changes outlined above appropriately address the issues outlined in Item No. 3 of An Bord Pleanála's Notice of Pre-Application Consultation Opinion.

2.4 Item No. 4 – Residential Amenity

The Board required the following in relation to Residential Amenity:

'Further consideration and/or justification of the documents as they relate to the internal layout of the proposed development, having particular regard to the provision of resident support facilities and amenities and their location within the overall development, having regard to the provisions of the Sustainable Urban Housing: Design Standards for New Apartments, 2018 including the specific planning policy requirements in respect of Build to Rent and Shared Accommodation developments. The provision of a variety of facilities should contribute to the creation of a shared environment where individual renters become more integrated and develop a sense of belonging with their neighbours in the scheme. The further consideration of these

issues may require an amendment to the documents and/or design proposals submitted at application stage.'

2.4.1 Applicants Response to Item No. 4

Following receipt of the Board's Notice of Pre- Application Consultation Opinion on 11th July 2019, the design team re-examined the proposed development's design and layout with regards to residential amenity. The proposed development is compliant with the guidelines and standards set out in the *Sustainable Urban Housing: Design Standards for New Apartments, 2018*, specifically having regard to the policies for Build-to-Rent Accommodation.

With regards to shared facilities and communal spaces, the proposed development includes 613sqm of internal communal amenity spaces, including a concierge, gym, library/co-working space, a cinema/multi-media room and multi-purpose spaces, at ground and first floor levels. Further to this, residents have access to a landscaped courtyard featuring a basketball/kickabout court, a bbq area, a playground, a table tennis table and multiple seating areas, at first and second floor levels.

The above items are discussed in more detail in the Architectural Design Statement, prepared by C+W O'Brien Architects (Sections 10 and 12); Statement of Consistency & Planning Report, prepared by Hughes Planning and Development Consultants; and Landscape Plan and Landscape Design Rationale (pages 14 and 15), prepared by Cunnane Stratton Reynolds, which accompany this application.

We consider that the proposed development appropriately addresses the issues outlined in Item No. 4 of An Bord Pleanála's Notice of Pre-Application Consultation Opinion.

2.5 Item No. 5 – Finishes and Materials

The Board required the following in relation to Finishes and Materials:

'Further consideration of the documents as they relate to the detailed design of the proposed development. The documentation submitted at application stage should demonstrate that the external finishes, materials and detailing of the proposed buildings, together with the landscaping and surface/boundary treatments of the outdoor spaces would be of a sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.'

2.5.1 Applicants Response to Item No. 5

Details regarding the external finishes, materials and detailing of the proposed buildings are included on the elevations and in the Design Statement, prepared by C+W O'Brien Architects, which accompany this application. Details regarding the proposed landscaping and surface/boundary treatments of the outdoor spaces are provided in the Landscape Plan and Landscape Design Rationale, prepared by Cunnane Stratton Reynolds, which accompany this application.

The detailed design of the proposed development is of a high quality and once constructed the proposed development will make a positive contribution to the character of the area in the long term as is the desired outcome sought by An Bord Pleanála in Item No. 4 of their Notice of Pre-Application Consultation Opinion.

2.6 Item No. 6 – Public and Communal Open Space

'Further consideration should be given to the design rationale/justification outlined in the documents as it relates to the qualitative standards of public and communal open space provisions particularly in the context of the disposition and usability of such spaces. Details of usability and hierarchy of such spaces, ease of access and consideration of any impact in terms of overlooking issues that may arise to units at ground floor level should be considered. The further consideration of this issue may

require an amendment to the documents and/or design proposals submitted. A site layout plan which clearly distinguishes between public open space and communal open space should be submitted. Any proposed pedestrian connections to adjoining lands should be clearly indicated on plans. The prospective applicant should include any plans for public open spaces in the wider area, if known, and how such proposals would link in and integrate with the proposed development. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.'

2.6.1 Applicants Response to Item No. 6

The proposed development features public and communal open space areas in excess of the applicable requirements, as discussed in the Statement of Consistency and Planning Report, prepared by Hughes Planning and Development Consultants, and the Design Statement, prepared by C+W O'Brien Architects. Details regarding the specifications of public and communal open spaces provided on the site are included in the Landscape Plan and Landscape Design Rationale, prepared by Cunnane Stratton Reynolds, which accompany this application.

3.0 Statement of Response to Specific Information Required

The following sets out how the applicant has addressed the Board's request for additional specific information in respect of the proposed development.

3.1 Photomontages

The application is required to be accompanied by photomontages and site sections at appropriate intervals for the proposed development including how the development will interface with existing streets and contiguous lands. These items feature in the architectural drawing set, prepared by C+W O'Brien Architects, and photomontages, prepared by 3D Design Bureau, which accompany this application.

3.2 Daylight/Sunlight Analysis

The application is required to be accompanied by daylight/sunlight analysis showing an acceptable level of residential amenity for future occupiers of the proposed development, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development. This application is accompanied by a Daylight and Sunlight Analysis, prepared by 3D Design Bureau.

3.3 Traffic and Transport Impact Analysis

The application is required to be accompanied by a revised Traffic and Transport Impact prepared in response access to car park, roads layout, public transport capacity, car parking rationale and planned roads as well as a justification for a reduction in car parking spaces. A revised Transportation Assessment Report, prepared by NRB Consulting Engineers Ltd, accompanies the subject application under a separate cover. Justification for a reduction in car parking spaces also features in the Statement of Consistency & Planning Report, prepared by Hughes Planning and Development Consultants, which accompanies this application.

3.4 Water and Waste Water

The application is required to be accompanied by details regarding water and waste water. The Engineering Submission and associated engineering drawings, prepared by GDCL Consulting Engineers, which accompany the subject application, include information regarding water and waste water. The details contained therein address matters raised in the planning authority's opinion, dated 6th June 2019.

3.5 Construction and Demolition Waste Management

The application is required to be accompanied by a construction and demolition waste management plan. The application is accompanied by a Draft Construction, Demolition and Operational Waste Management Plan, prepared by GDCL Consulting Engineers.

3.6 Legal Agreement – Build-to-Rent

The application is required to be accompanied by a covenant or legal agreement pertaining to the development's use as a Build-to-Rent development. A draft legal agreement has been prepared by Hughes Murphy Solicitors and is provided under a separate cover.

3.7 Information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018

The application is required to be accompanied by the information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2019, as amended. This information is provided as an Appendix to the Statement of Consistency & Planning Report, prepared by Hughes Planning and Development Consultants, which accompanies this application.

4.0 Conclusion

This report sets out how the various issues raised by An Bord Pleanála, in their Notice of Pre-Application Consultation Opinion, in relation to the proposed residential development at Units 66 & 67 Fourth Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24, have been addressed.

The layout and design changes incorporated into the final scheme are considered to result in improvements to the overall development and ensure that a high-quality residential development will be provided.

It is therefore submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines.



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Director
for HPDC.