



Comhairle Contae  
Átha Cliath Theas  
South Dublin County Council

# Chief Executive's Report on Public Consultation



Proposed Draft  
Tallaght Town Centre  
Local Area Plan

2020-2026

**December 2019**

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## 1.0 INTRODUCTION AND BACKGROUND

South Dublin County Council has prepared a Draft Local Area Plan for the future development of Tallaght Town Centre pursuant to Sections 18, 19 and 20 of the Planning and Development Acts 2000 (as amended). South Dublin County Council undertook a statutory public consultation on the proposed Draft Plan between 12<sup>th</sup> September and 24<sup>th</sup> October 2019. The purpose of this Chief Executive's Report is to summarise and review issues raised during the Draft Plan consultation process and to make any further recommendations which may arise from submissions made.

The Local Area Plan area comprises 382 Hectares within and adjoining the core of Tallaght. It comprises 8 Electrical Divisions. The Plan area is home to a variety of key Town Centre uses and institutions including IT Tallaght, Tallaght Hospital, South Dublin County Council Offices, The Square Shopping Centre and a range of residential and commercial uses incorporating the historic village of Tallaght and the more recently developed town centre area. The Local Area Plan also incorporates a number of parks and historical sites. The current process included a review of the Local Area Plan adopted in 2006 and further extended by statutory process in 2011 to 2016. This Local Area Plan has now expired.

A considerable time has elapsed since the previous Local Area Plan for Tallaght Town Centre was prepared, with marked changes in the economic climate during the same period. A new County Development Plan for South Dublin County was also adopted in 2016. In addition, updated and new national level policy guidance on a variety of issues is now available. Notably in recent years Tallaght has emerged as a centre of excellence in relation to renewable energy technologies. The challenge for the next Tallaght Town Centre Local Area Plan is in responding to these and other current issues and producing a coherent strategy, which can effectively guide the development of the settlement over the coming years and provide a framework for its long-term development.

Section 19(1) of the Planning and Development Acts 2000 – 2017, sets out the circumstances where Local Area Plans are mandatory and the types of situation in which they may be prepared. Local Area Plans can be prepared for any areas that the planning authority considers suitable and, particularly, for areas which require economic, physical and social renewal and for areas likely to be subject to large scale development during the life of the Plan. The relevant provision in relation to Tallaght Town Centre is set out below.

*19.—(1) (a) A local area plan may be prepared in respect of any area, including a Gaeltacht area, or an existing suburb of an urban area, which the planning authority considers suitable and, in particular, for those areas which require economic, physical and social renewal and for areas likely to be subject to large scale development within the lifetime of the plan.*

The South Dublin County Development Plan 2016-2022 is the strategic planning document for the County. It provides the context for any Local Area Plan. It sets out:

- The overall strategy for the county.
- The role of each town and settlement in the county including the extent of population growth envisaged in each place and the type of services which should be provided in each centre.
- Heritage designations including buildings/features on the Record of Protected Structures and areas identified as Architectural Conservation Areas.
- Land use zoning.

A Local Area Plan takes a detailed look at a specific area. It indicates how an area will develop over time, the types of development that will be encouraged and where these should be located. It sets out principles and objectives for the future development of the area. For example, it can contain objectives relating to density, public open space, car parking, infrastructure, heritage, community facilities and design standards. Local Area Plans have a 6-year lifespan (which can be extended to 10 years).

Local Area Plans must be consistent with the objectives and core strategy in the corresponding city or county Development Plan and with the relevant regional spatial and economic strategy. Local Area Plans prepared for lands within the Greater Dublin Area must also be consistent with the transport strategy for the Greater Dublin Area prepared by the National Transport Authority.

Tallaght Town Centre Local Area Plan will influence the types of development allowed in the town centre. The Planning Authority is required to take the Local Area Plan into account when assessing planning applications. It will also guide the works carried out by South Dublin County Council in the town centre area.

The Local Area Plan will be important in setting out a clear vision for Tallaght Town Centre to frame its future development. However, it is important to note that the realisation of the objectives in the Plan will depend significantly on private investment through the development or redevelopment of lands. Therefore, the Plan must also focus on creating the right conditions to facilitate this and provide clarity for development proposers on the type, form and nature of future development which can be accommodated in the town centre.

Land use zoning for Tallaght is included in the South Dublin County Development Plan 2016-2022. This issue cannot be re-examined or changed as part of the review process.

### **Structure of the Report**

This report comprises of the following parts:

1. An introduction including details on the purpose of the report and the background to the preparation of a Local Area Plan.
2. An outline of the public consultation carried out.
3. A summary of the Draft consultation process and outcome including a list of submissions.
4. Details of the next steps in the Local Area Plan making process.
5. Summary of the issues raised during the public consultation process.
6. Details and categorisation of each of the issues raised under submissions. Any recommendations of the Chief Executive arising from submissions made.
7. Summary of recommendations and conclusion.
8. Appendices:
  - Appendix A. Public Notice.

## 2.0 OUTLINE OF THE PUBLIC CONSULTATION PROGRAMME

On the 12<sup>th</sup> September 2019 South Dublin County Council (SDCC) gave notice that it had prepared Proposed Draft Local Area Plan for Tallaght Town Centre, pursuant to Section 18 of the Planning and Development Act 2000 (as amended).

The public consultation period took place from the 12<sup>th</sup> September 2019 to the 24<sup>th</sup> October 2019 inclusive (a period of 6 weeks) during which time information on the Proposed Draft Local Area Plan and environmental reports (Strategic Environmental Assessment (SEA) Screening Reports and Appropriate Assessment (AA) Screening Reports) were disseminated to the public and submissions were invited.

The Draft Local Area Plan public consultation process involved the following key elements:

- Official launch on Thursday 12<sup>th</sup> September 2019 by the Mayor, elected members and staff of the Council;
- Notification of the preparation and display of the Proposed Draft Local Area Plan for the purpose of public consultation were placed in the Irish Times and The Echo on the 12<sup>th</sup> September 2019 together with information on the public consultation programme and an invitation for submissions;
- Press release and accompanying photographs were issued to local and national press and social media following the launch;
- The proposed Draft Local Area Plan was advertised on the South Dublin County Council Website, Consultation Portal and the Council's social media platforms during the 6-week public consultation period with regular posting on the Council's social media platforms throughout the consultation period;
- Four public information sessions were held in Tallaght Library, with staff of the Planning Department available to answer the public's queries at the following times: Monday 23<sup>rd</sup> September 1:00 - 4:00 pm, Tuesday 1<sup>st</sup> October 4:00 - 7:30 pm, Thursday 10<sup>th</sup> October 1:00 - 4:00 pm, Tuesday 15<sup>th</sup> October 4:00 - 7:30 pm;
- Letters issued to the Minister for Housing, Planning and Local Government, The Office of the Planning Regulator and other relevant prescribed authorities;
- Planning staff were available in the Foyer, Tallaght Council Offices to answer queries on Wednesdays between 11-1pm during the public consultation period, and were available any time requested at the public counter;
- Briefings and Q&A sessions held directly with community and business representatives in the area.

### 3.0 OUTCOME OF THE PUBLIC CONSULTATION PROGRAMME

The number of submissions that were received during the public consultation period came to 49. All submissions were read, analysed and summarised. A list of all the persons/bodies that made submissions within the public consultation period is provided in Table 1 below, together with a reference number that can be clicked as a link (on electronic copies of this Chief Executive's Report) to a database containing scanned copies of each submission. For reasons of data protection, these links can only be accessed by Elected Members of South Dublin County Council.

Table 1 below details the breakdown of submissions made and to which proposed variation the submission pertains.

**Table 1: List of Persons / Bodies that made submissions**

Person	Company (If applicable)	Ref
Kevin Cannon		<a href="#">TTCLAP0001</a>
Veronica Cooke	Kildare County Council	<a href="#">TTCLAP0002</a>
Barry Dunne		<a href="#">TTCLAP0003</a>
Cian O'Mahony	Environmental Protection Agency	<a href="#">TTCLAP0004</a>
David Clements	National Transport Authority	<a href="#">TTCLAP0005</a>
Eddie Bohan		<a href="#">TTCLAP0006</a>
Transport Infrastructure Ireland (TII)	Transport Infrastructure Ireland (TII)	<a href="#">TTCLAP0007</a>
Gerard Stockil	Tallaght Community Council	<a href="#">TTCLAP0008</a>
Andrew Byrne	Health Service Executive	<a href="#">TTCLAP0009</a>
Irish Water	Irish Water	<a href="#">TTCLAP0010</a>
Finbarr Sullivan		<a href="#">TTCLAP0011</a>
John Sheehan, Sheehan Planning	Irish Life Assurance PLC	<a href="#">TTCLAP0012</a>
Chris Browne, Hughes Planning and Development Consultants	Steelworks Property Developments Ltd., Absolute Limousines Ltd., Boherkill Property Developments Ltd. & Hollin Court Development Ltd.	<a href="#">TTCLAP0013</a>
Thomas Hennessy, McCutcheon Halley	John Doyle and Paraic Mooney	<a href="#">TTCLAP0014</a>
Pauline Byrne, Brady Shipman Martin	Glenveagh Properties PLC	<a href="#">TTCLAP0015</a>
Lisa Dempsey	Ambervale Cairnwood Community Group	<a href="#">TTCLAP0016</a>
Kevin Cox	Tesco Ireland Limited	<a href="#">TTCLAP0017</a>
Alan Hanlon	Department of Education & Skills	<a href="#">TTCLAP0018</a>
Gerard Stockil	Tallaght Community Council	<a href="#">TTCLAP0019</a>
Tony Bamford Planning	SDI (Tallaght) Ltd	<a href="#">TTCLAP0020</a>
Ellen O Malley Dunlop		<a href="#">TTCLAP0021</a>
Tom Phillips		<a href="#">TTCLAP0022</a>
Patricia Thornton, Thornton O'Connor Town Planning	Power Scaffolding Supplies limited	<a href="#">TTCLAP0023</a>
Karen Donovan	Office of Public Works	<a href="#">TTCLAP0024</a>

Peter Byrne	South Dublin Chamber	<a href="#">TTCLAP0025</a>
Trevor Sadler, MCG Planning	Greenleaf Group	<a href="#">TTCLAP0026</a>
Ed Barrett, Gravis Planning	Print and Display Limited, Downtree Investments Limited, PD Visual Limited (T/A P&D Visual) and Westside Press Limited	<a href="#">TTCLAP0027</a>
Maude Ni Bhrolchain	Office of the Planning Regulator	<a href="#">TTCLAP0028</a>
Phoebe Duvall	An Taisce	<a href="#">TTCLAP0029</a>
Michael Murphy, Manager DAU	Dept. of Arts, Heritage and the Gaeltacht	<a href="#">TTCLAP0030</a>
Alan Crawford, BMA PLANNING	The Owners of The Square Town Centre lands	<a href="#">TTCLAP0031</a>
Marie Corr		<a href="#">TTCLAP0032</a>
Zara Stockilk		<a href="#">TTCLAP0033</a>
David Kennedy		<a href="#">TTCLAP0034</a>
Paula Gilligan		<a href="#">TTCLAP0035</a>
Tara De Buitlear		<a href="#">TTCLAP0036</a>
South Dublin Conservation Society	South Dublin Conservation Society	<a href="#">TTCLAP0037</a>
Deputy President	Technological University Dublin Students Union Tallaght Campus	<a href="#">TTCLAP0038</a>
Kieran Mahon		<a href="#">TTCLAP0039</a>
Niall D. Brennan Associates	Mark O'Reilly (Prizeview Ltd)	<a href="#">TTCLAP0040</a>
Brock McClure Planning & Development Consultants	Bartra Capital Property Group	<a href="#">TTCLAP0041</a>
Brock McClure Planning & Development Consultants	John & Deirdre Mulvey	<a href="#">TTCLAP0042</a>
Brock McClure Planning & Development Consultants	Square Foot Property Services Limited	<a href="#">TTCLAP0043</a>
Brock McClure Planning & Development Consultants	Austin McHale	<a href="#">TTCLAP0044</a>
Máire Ford		<a href="#">TTCLAP0045</a>
Kiaran O'Malley & Co. Ltd	Dominican Order	<a href="#">TTCLAP0046</a>
John Gannon, Tom Phillips & Associates	Atlas GP Limited	<a href="#">TTCLAP0047</a>
Peter Forde	Belgard Residents Association	<a href="#">TTCLAP0048</a>
	Tallaght Community Council	<a href="#">TTCLAP0049</a>

## 4.0 NEXT STEPS

This Chief Executive's Report on the public consultation for the Proposed Draft Tallaght Local Area Plan is hereby submitted to the members of SDCC for consideration.

The Chief Executive's Report will be considered at the January County Council Meeting.

The following decision options available to the members, as set out in Section 20 of the Planning and Development Act 2000 (as amended), are summarised as follows:

- a) Make: No Material Alteration Resolution to make the Proposed Local Area Plan, subject to variations and modifications which do not constitute a material alteration. The Proposed Variation(s) is effective immediately.
- b) Make: Subject to Material Alteration Resolution to make the Proposed Local Area Plan subject to variations and modifications which constitute a material alteration<sup>1</sup>.
- c) Not Make: Resolution not to make the Proposed Local Area Plan.

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<sup>1</sup> *The Planning Authority shall determine if the variations and modifications to the Proposed Draft Local Area Plan are material alterations. Material alterations will result in an additional public consultation stage and consideration of AA and SEA implications.*

## 5.0 SUMMARY OF ISSUES RAISED

All 49 of the valid submissions received by the Council during the public consultation were read, summarised and analysed. A total of 255 issues were identified during this process. Many of the issues raised were interrelated and therefore categorised under 33 separate category headings for the purpose of identifying the issues that were raised more frequently. Each of the category headings, together with the number of times that issues were raised in relation to each heading are detailed in Table 2 below.

**Table 2: Breakdown of issues raised in submissions received for all categories**

Breakdown of Issues for All Top-Level Categories			
	Category	Issues Raised	% of Total
1	General / Acknowledgement	4	1.57%
2	Chapter 1: Introduction & Policy Context	5	1.96%
3	Chapter 2: Urban Framework	9	3.53%
4	Section 2.2 Access and Movement	12	4.71%
5	- 2.2.2 Pedestrian and Cycle Movement	6	2.35%
6	- 2.2.3 Public Transport	5	1.96%
7	Section 2.4 Land Use and Urban Functions	7	2.75%
8	- 2.4.2 Mixed Use Frontages	3	1.18%
9	Section 2.6 Density / Plot Ratio	14	5.49%
10	Section 2.6 Height and Built Form	16	6.27%
11	Section 2.6 Design, Built Form and Finishes	5	1.96%
12	Section 2.7 Public Realm and Open Space	12	4.71%
13	Chapter 3: Neighbourhoods - 3.2 The Centre	10	3.92%
14	Chapter 3: Neighbourhoods - 3.3 Cookstown	10	3.92%
15	Chapter 3: Neighbourhoods - 3.4 The Village	8	3.14%
16	Chapter 3: Neighbourhoods - 3.5 Broomhill	4	1.57%
17	Chapter 3: Neighbourhoods - 3.6 Greenhills	1	0.39%
18	Chapter 3: Neighbourhoods - 3.7 TUD/TC	3	1.18%
19	Chapter 3: Neighbourhoods - 3.8 Whitestown	3	1.18%
20	Chapter 3: Neighbourhoods - 3.9 The Town Park	1	0.39%
21	Chapter 4: Economic Development and Tourism	13	5.1%
22	Chapter 5: Community Facilities	16	6.27%
23	Chapter 5: Residential Development	10	3.92%
24	Section 5.2.1-5.2.2 Housing Mix	16	6.27%
25	Chapter 6: Heritage and Conservation	7	2.75%
26	Chapter 7: Climate Change: Mitigation & Adaptation	9	3.53%
27	Chapter 8: Implementation and Sequencing	17	6.67%
28	Chapter 9: Tallaght Specific Development Standards	3	1.18%
29	Appendix 2: Context and Process	2	0.78%
30	Appendix 3: Social Infrastructure Audit	2	0.78%
31	Appendix 4: Strategic Flood Risk Assessment	3	1.18%
32	Appendix 5: Strategic Environmental Assessment	3	1.18%
33	Miscellaneous	16	6.27

In terms of the issues that were raised most frequently, the highest number (23 times / 9.02%) related to Access and Movement (including 'Pedestrian and Cycle Movement' and 'Public Transport'). The second highest proportion of issues raised (17 times/6.67%) related to Implementation and Sequencing and the issues of Height and Built Form, Housing Mix and Community Facilities were equally raised 16 times each / 6.27%. A high number of submissions highlighted site specific issues categorised under the above or related to the individual neighbourhood areas.

## 6.0 CATEGORISATION, SUMMARY AND RESPONSES TO ISSUES RAISED

This Section presents a summary of each of the issues raised under the relevant category heading. Each of the issues listed includes a reference that can be clicked as a link (on electronic copies of this Chief Executive's Report) to a database containing scanned copies of each submission. For reasons of data protection, these links can only be accessed by Elected Members of SDCC.

The Chief Executive has prepared responses and recommendations under the relevant section of the Draft Local Area Plan (LAP). Amendments to the Draft Local Area Plan are, where practicable, identified by their location in the Draft LAP. **Additions** to the text, where specific text is proposed, are identified through the use of **green print**. **Deletions** to the text are shown in **red print** with strikethrough.

### 6.1 GENERAL / ACKNOWLEDGEMENT

1. Kildare County Council have no comment to make regarding the proposed Draft LAP ([TTCLAP0002, Veronica Cooke](#))
2. EPA recommends codifying the many specific objectives contained in the Plan to make it easier to link the SEA findings and recommended mitigation measures and the associated relevant plan objectives. ([TTCLAP0004, Cian O'Mahony, Environmental Protection Agency](#))
3. The Office of Public Works (OPW) welcomes the opportunity to comment on the Proposed Draft Tallaght LAP and welcome the strong commitment to adhere to the 'Planning System and Flood Risk Management Guidelines (2009) and Circular PL02/2014' and to proactively plan for Climate Change in considering the management of flood risk. ([TTCLAP0024, Karen Donovan, Office of Public Works](#))
4. We need to learn from our mistakes, as well as our successes and should not be afraid of being ambitious for the county town and should always raise the bar. There is a need for the ambition of Tallaght to be fairly treated compared to other areas. ([TTCLAP0008, Gerard Stockil, TCC, Tallaght Community Council](#))

#### Chief Executive's Response

These submissions are welcomed by the Chief Executive. The recommendation of the EPA to codify objectives of the LAP would assist with legibility of the Plan and appendices and is considered to be worth incorporating into the Plan.

#### Chief Executive's Recommendation

- (1) Codify the objectives and policies contained within the LAP.
- (2) In addition to the specific amendments recommended in this Chief Executive's Report, the Chief Executive recommends that amendments to the Draft Plan be made for general typographical errors, punctuation, formatting, grammatical errors & any inconsistencies in tables/ figures, maps and text.

1. EPA suggests amending the wording of the objective bullet point 5, to refer to 'Respect, protect and promote our natural and built heritage and architectural features...' ([TTCLAP0004](#), [Cian O'Mahony, Environmental Protection Agency](#))
2. EPA provides recommendations and resources, including links to various environmental guidance/reports and resources, to assist in the Plan making process. The inclusion of Figure 1.3 Hierarchy of Plans is welcomed and it is suggested that a reference to PLUTO (Planning Land Use and Transport Outlook 2040 (NTA)) would be useful. ([TTCLAP0004](#), [Cian O'Mahony, Environmental Protection Agency](#))
3. TII highlights Section 2.2.1 of the LAP and reference to statutory guidelines contained there within. TII is concerned that the Statutory Section 28 Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities (2012)' are not referred in the LAP. TII also highlights that Department of Transport, Tourism and Sport's Guidelines for 'Setting and Managing Speed Limits in Ireland' should also be observed by the planning and roads authority. ([TTCLAP0007](#), [Transport Infrastructure Ireland \(TII\), Transport Infrastructure Ireland](#))
4. The submission from the Office of the Planning Regulator (OPR) outlines the context of Tallaght within the Regional Spatial and Economic Strategy and some objectives of particular pertinence. The approach proposed in the draft LAP is broadly supported by the OPR and is consistent with these objectives, in particular RPO 5.3, 6.12, and 6.13. The development of Tallaght town centre as an important centre and county town within the metropolitan area is consistent with objectives of the RSES regarding sequential development across the Dublin Metropolitan Areas Strategic Plan area. ([TTCLAP0028](#), [Maude Ni Bhrolchain, Office of the Planning Regulator](#))
5. The submission from the Office of the Planning Regulator (OPR) notes ongoing Variations to the County Development Plan and that it is possible that the draft LAP may have to be amended to take account of any such variations that properly aligns the County Development Plan with the provision of the RSES. It would be appropriate to include an objective or reference to this effect in the LAP. ([TTCLAP0028](#), [Maude Ni Bhrolchain, Office of the Planning Regulator](#))

### Chief Executive's Response

Suggested amendments of the EPA regarding overarching objectives are considered to be appropriate.

The Planning Authority notes the concern of TII and considers it appropriate to refer to the 'Spatial Planning and National Roads Guidelines for Planning Authorities (2012)' and consultations with TII and NTA with regard to proposals affecting the N81.

The Planning Authority welcomes support from the OPR for the approach of the LAP which is recognised as being consistent with objectives of the Regional Spatial and Economic Strategy, particularly relating to Tallaght's status as an important centre in the metropolitan area. The Planning Authority will ensure that the LAP aligns with the County Development Plan and ongoing variations to the County Development Plan.

### Chief Executive's Recommendation

- (1) Update objective bullet point 5 on page 9 of the Draft LAP as follows:

*Respect, **protect** and promote our natural and built heritage and architectural features...*

- (2) Refer to 'Spatial Planning and National Roads Guidelines for Planning Authorities (2012)' in Figure 1.3 and Section 2.2.1 of the LAP and that proposals for enhanced public realm and

connectivity across the N81 for pedestrians and cyclists will be carried out in consultation with the NTA and TII.

### 6.3 CHAPTER 2: URBAN FRAMEWORK

1. NTA recommends that the nature and extent of the development envisaged for the Plan area in the Draft is retained in the final LAP, as it would represent the close integration of land use and transport planning. ([TTCLAP0005](#), [David Clements, National Transport Authority](#))
2. It is requested that the Council sponsor a design competition to ensure that a 'Garden City and Water Features' theme is placed on top of the overly modern looking concrete style of Tallaght Town Centre. ([TTCLAP0008](#), [Gerard Stockil, TCC, Tallaght Community Council](#))
3. The Overall Urban Structure for Tallaght in general, and 'The Centre' neighbourhood in particular, creates defined and rigid block form and layout, which does not fully lend itself to the creation of a responsive urban design solution in the delivery of development on these lands, nor does it fully reflect existing built form. It is suggested that the indicative urban layout applicable to 'The Centre', should be flexible in order to create:
  - Effective movement networks
  - Effective streetscapes
  - Meaningful urban spaces
  - Respectful of existing building lines and ground floor uses
  - Complementary to existing built form
  - Respond to current and future uses and built form. ([TTCLAP0015](#), [Brady Shipman Martin, Brady Shipman Martin, Glenveagh Properties PLC.](#))
4. It is requested that a statement be included to make it clear that urban design diagrams, with specific reference to Figure 2.4, are indicative of principles and are not prescriptive in order to avoid any potential ambiguity at planning application/ appeal stage. ([TTCLAP0031](#), [Alan Crawford, BMA PLANNING, The Owners of The Square Town Centre lands](#))
5. The submission requests that an area to the north west across the Luas line and Katherine Tynan Road is retained as a green space. ([TTCLAP0048](#), [Belgard Residents Association](#))
6. In relation to Objective UF2, the DES seeks a possible exemption or relaxation from a mixed-use designation for the school sites due to difficulties in identifying closely compatible uses. ([TTCLAP0018](#), [Alan Hanlon, Department of Education & Skills](#))
7. Health Service Executive's (HSE) submission details a number of Guidelines and Strategies and associated actions which they consider need to be taken into account when making the draft LAP, including:
  - Healthy Ireland;
  - Tallaght Health Status;
  - Get Ireland Active - National Physical Activity Plan for Ireland;
  - Healthy Ireland - A Healthy Weight for Ireland. ([TTCLAP0009](#), [Andrew Byrne, Health Service Executive](#))
8. The tone of the objectives for the new Urban framework suggests a very bland increase in density and building heights. It is submitted that the vision set out here should strive for a 'best in class'

expansion of the area with direction for urban blocks of distinct character with unique design characteristics that would associate them with Tallaght as opposed to being similar to suburban expansion in other parts of the City. It is submitted that the policies set out in the draft LAP are too vague and it should be possible and warranted to get very specific about development criteria for specific sites and neighbourhoods. ([TTCLAP0019](#), [Gerard Stockil, TCC](#))

9. It is considered that the plan should ensure that all new residential development is within a 5-minute walk of public open/civic space. ([TTCLAP0032](#), [Marie Corr](#))

### **Chief Executive's Response**

Comments from the NTA in relation to the nature and extent of development is acknowledged and accepted.

The Draft Plan proposes no alterations to existing green areas located to the north west of the plan lands adjoining the Luas line and Katherine Tynan Road.

Any decision to run a design competition for the development of specific sites around any particular theme will arise as sites begin to come forward for development within the LAP lands. The importance of particular sites and the appropriateness of themes will vary over time. Therefore, competitions will be run as considered necessary by the Council. It is noted that the Council plans to carry out a design competition for the overall design of the future proposed post primary school and innovation centre, which are to be located on Council owned lands to the north of Belgard Square North.

### *Plan Making and Urban Design Approach*

A number of the submissions seek clarification of and alterations to the Urban Design approach. The core work around the development of the LAP was based on a detailed urban design assessment around the core concepts of centrality and distance from public transport. The Plan approach is characterised by cascading heights and intensity outwards from the core of the Town Centre and public transport nodes and using the existing hierarchy of streets.

The overall strategy is formulated using best practice urban design principles; urban function, movement and public transport, land use, building height and density.

The Draft Plan is the product of detailed research and analysis including; the outputs of the pre-plan consultation process carried out in 2017, a review of the planning history of the LAP lands, review of current population trends and a comprehensive area level analysis informed by a number of surveys and extensive on site review by the Plan team, urban designer and the Architects Department of SDCC. Using all of this as the basis for the plan making process, the urban designers then set to work preparing the Urban Framework.

The elements of the Urban Framework Development are set out in Chapter 2 of the Plan and are informed very much by urban design analysis which identified that the Framework needed to address fundamental principles of connectivity, movement and place making, the implementation of which would roll out over a timeframe much longer than the 6-year timeframe of the plan. It was acknowledged that the permeability, connections and place making could not all be delivered within the 6-year timeframe of this plan, but that it would form a longer-term framework which would inform future LAP's and ensure the long-term deliverability of the overall framework. In tandem with this, distinct neighbourhoods began to emerge based primarily on use patterns and connections and links across the LAP lands. With the framework and neighbourhoods in place the detailed design elements including the density and height strategies, based on centrality and proximity to transport nodes emerged. The place making process led to the emergence of green infrastructure link, urban squares and public realm elements.

In terms of development capacity, the core strategy of the County Development Plan was used to provide clarity on the extent of development expected during the 6-year timeframe of the LAP. In respect of the wider LAP area and longer-term potential of the plan lands the extent of development is estimated using extent of lands available and assumptions around, density, plot ratio and mix of development.

In addition, the key overarching objectives that guide the future development of Tallaght arise from the provisions of the County Development Plan and have been incorporated into the plan making process:

- To direct land uses and intensity of development in a manner that creates a sustainable urban form, based on the integration of land use and transport planning (Objective UF1);
- To promote a mix of uses in a manner that creates a sustainable and active area (Objective UF2);
- To ensure that development is carried out in a design led manner that prioritises place making and accords with the core principles of urban design and the creation of integrated streets (Objective UF3);
- To ensure that development is laid out in a series of blocks and plots that are legible, permeable and appropriate in land use, scale, building height, street widths, urban grain and street frontages (Objective UF4);
- To upgrade existing and design new streets using an integrated approach to pedestrian, cyclist and vehicular movement and ensure that the movement function of each street is reflected by an appropriate design response and design speed (Objective UF5);
- To provide attractive, interesting and well used public realm and open spaces using place making and urban design principles, creating a pedestrian centred environment with active, inviting public space and parks (Objective UF6); and
- To protect, enhance and develop an interconnected green and blue infrastructure network of parks, open spaces, hedgerows, grasslands, rivers and streams for amenity and recreation, biodiversity protection, flood management and adaptation to climate change (Objective UF7).

Proposals for new development in the Plan lands will be required to comply with the stated Local Area Plan objectives relating to the Urban Framework. The assessment of a proposal's compliance with these overarching objectives shall have regard to, and be informed by, the policy, parameters, guidance and content of the Plan.

Figure 2.4 provides a blueprint for the overall urban structure of the area in the longer term. It is also acknowledged that the detailed layout of individual sites is not and could not be finalised at this time. Therefore, it is not proposed to alter the principle of that structure in terms of the existing primary and secondary routes/frontages and connections within and between the Town Centre and adjoining areas. Where submissions are made in relation to particular sites, and where the overall structure may be affected, the Council will review and make recommendations as necessary and any such amendments to the urban framework will be included in the final adopted plan (See also Chapter 3 Neighbourhoods). Within individual blocks where detailed planning applications are made, these will be assessed against the overall Urban Framework.

In relation to the proposed Urban Squares at the Transport Interchange (The Square) and the Belgard Urban Square located at the northern edge of the Centre, it should be clarified that it is intended that these Urban Squares will emerge in conjunction with other public infrastructure elements, including the transport interchange and in the case of the Cookstown Square, a secondary school, an innovation centre and affordable housing. Therefore, the inclusion of minimum size requirements for these squares where appearing in the phasing tables or elsewhere is premature pending the detailed design of these integrated urban spaces.

In relation to concerns raised by the Department of Education regarding location of a future proposed school on sites designated with mixed use frontages it is noted that use for educational purposes is 'Permitted- In- Principle' in the Town Centre and Village Centre zoned areas across the plan lands. It is on this basis that any proposed school would be assessed within the area. Any proposed school would fulfil the zoning use requirements of the area. Mixed use requirements would not apply to a development such as a school where residential or commercial development would not form part of the development. The purpose of mixed-use frontages is to ensure an overall balance of uses across the plan lands. They are a guide rather than a blanket requirement.

The comments of the HSE in relation to relevant health related strategies and programmes is noted. One of the principal tenets of the place making urban design approach is the importance of the health and well-being of the future residents and workers of the new urban area. On this basis it is considered unnecessary to add specific reference to the strategies and programmes listed.

### Chief Executive's Recommendation

- (1) Add the following text clarification as note to end of Section 2.3.

*The proposed urban structure is a guide for future development in the area and is not intended to be rigidly adhered to. Flexibility in relation to the proposed urban structure will be considered where it is demonstrated that the overarching objectives of the urban framework and key elements of the proposed urban structure are achieved in any alternative layout.*

- (2) Add following text to section 2.3 of the LAP:

*The Council will initiate urban design competitions on Council owned land and will encourage applicants to do the same on privately owned land, as considered appropriate where the building or site in question is considered to be of significant importance to the build-out of the LAP.*

- (3) Amend text to remove specific size requirements for Urban Squares where they appear in text across the document.
- (4) Include cross reference to Appendix 2 on plan making and urban design process and update text as necessary.
- (5) Include minor amendments to the block plans as appropriate within the final framework plan and as addressed in the following sections.

## 6.4 SECTION 2.2 ACCESS AND MOVEMENT

### 6.4.1 SECTION 2.2 ACCESS AND MOVEMENT

1. NTA notes that SDCC and the NTA have commenced preparatory work on a transport study covering the area which will comprise a key input into the review of the County Development Plan. Recommends that the LAP include the following existing transport policies and objectives as specific policies and objectives of the LAP:
  - Accommodation of the emerging Greenhills to City Centre Bus Corridor;
  - The development of a transport hub in Tallaght Town Centre which facilitates ease of access for residents, workers, shoppers and visitors to all public transport services and facilitates seamless interchange between all bus services; between bus services and Luas; and between cycling, bus and Luas; and
  - Development of the Greater Dublin Area Cycle Network, with particular priority given to route 9A and SO5. ([TTCLAP0005](#), [David Clements](#), [National Transport Authority](#))

2. NTA acknowledges that County Development Plan standards will apply in Tallaght and recommends that the Council consider an area-based approach, particularly in the centre, which would identify a total number of parking spaces permissible across all land use developments. ([TTCLAP0005](#), [David Clements, National Transport Authority](#))
3. TII advises that the N81 is a national secondary route and therefore development of this route under this Plan or as a result of private development in the vicinity of this road should have regard to the Statutory Section 28 Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities (2012)'. ([TTCLAP0007](#), [Transport Infrastructure Ireland \(TII\), Transport Infrastructure Ireland](#))
4. The submission from the Office of the Planning Regulator (OPR) notes the proposed transport interchange as the principle key piece of transport infrastructure proposed under the draft LAP, for which it is an objective of the NTA's Transport Strategy for the GDA to achieve. The planning authority should satisfy itself that the proposed draft LAP and the specific proposals concerning the transport interchange are consistent with the Transport Strategy for the GDA 2016-2035. ([TTCLAP0028](#), [Maude Ni Bhrolchain, Office of the Planning Regulator](#))
5. The submission from the Office of the Planning Regulator (OPR) notes that proposals regarding the N81 include 'improved connections across the N81 and to the surrounding area', which may have implications for safety, capacity and efficiency of national roads, contrary to the requirements of the Spatial Planning and National Roads Guidelines for Planning Authorities (DEC&LG, 2012). The planning authority should satisfy itself and through engagement with Transport Infrastructure Ireland and the National Transport Authority that the proposed draft LAP and proposals concerning the N81 are consistent with the said Guidelines in this regard. ([TTCLAP0028](#), [Maude Ni Bhrolchain, Office of the Planning Regulator](#))
6. The inclusion of text is sought to support the maintenance of good access for all modes of transport to the Square, including destination traffic to The Square from the main traffic routes. ([TTCLAP0031](#), [Alan Crawford , BMA PLANNING , The Owners of The Square Town Centre lands](#))
7. The submission highlights traffic congestion in the north eastern corner of Cookstown Industrial Estate on the Old Belgard Road and Belgard Road intersection with Katherine Tynan Way R838. There is poor pedestrian provision in this area with congestion and tram lines crossing. It is considered that the LAP should consider providing for the opening of a vehicular route from the middle roundabout at the entrance to First Avenue to Katharine Tynan Way, as per the previous LAP, and/or closing off of the junction at Old Belgard Road and Katharine Tynan Way on the south side of the junction. It would create a more amenable environment for vulnerable road users in this area and also have the added benefit of not increasing the number of road crossings on this section of Luas line but moving it west to a more sensible location. ([TTCLAP0011](#), [Finbarr Sullivan](#))
8. Provision of accessible, affordable, and flexible transport systems should be a strategic aim for development of Tallaght which should include a number of provisions to enable people as they age 'to get out and about'. The promotion of walking and cycling, upgrading of street networks, connectivity, encouragement of public transport use and 'greening' of routes are welcomed initiatives. A number of Smarter Travel Policy points may help the implementation of same. The submission indicates that the needs of cyclists need to be taken into account in accordance with the National Cycle Policy Framework, in particular: filtered permeability, maintenance of cyclist infrastructure, cyclist-friendly spaces. ([TTCLAP0009](#), [Andrew Byrne, Health Service Executive](#))
9. Submission relates to a specific site at Belgard Square North and Belgard Gardens. Connectivity and permeability are welcomed within the draft LAP, however it is requested to remove the central amenity corridor from the Belgard Garden site, as it is not in line with a permitted development at the subject site. It is considered that the permitted street fully complies with the intention of the draft LAP to provide for pedestrian and cyclist accessibility. ([TTCLAP0047](#), [Atlas GP Limited, Atlas GP Limited](#))

10. A proposed land bridge to link The Square across the N81 with Sean Walsh Park included in the 2006 Plan has not been included in the Draft LAP and clarity is requested on the reason for this structure, strongly requesting that it is re-inserted, with a delivery date, if it has been deliberately dropped from the plan. The current pedestrian bridge has significant personal safety issues and it is considered that an iconic landbridge would be a significant amenity for the town centre at this location connecting the proposed extension to The Square on their South car park and Sean Walsh Park which is a Green Flag park. ([TTCLAP0049](#), [Tallaght Community Council](#))
11. The submission contends that the Tallaght Town Centre Masterplan must include provision for a delta junction for the Luas on the edge of the Masterplan lands at the junction of Bothar Katharine Tynan and the Cookstown Road. It is considered that the delta junction will allow for trams to go directly to the Square from Saggart instead of the current cumbersome arrangement of switching trams at the Belgard interchange. ([TTCLAP0032](#), [Marie Corr](#))
12. It is contended that the Tallaght Town Centre Masterplan should create a tunnel on the N81, which would allow for the tunnelling of the of the N81 close to the Whitestown Hub neighbourhood to re-emerge just past the Village neighbourhood. It is considered that turning the Tallaght bypass into an underpass at this location would allow for an extension of Watergate park and the provision of important and necessary open space and amenity space and also allow for the provision of safe local road access above ground for public transport, motorists, pedestrians and cyclists. ([TTCLAP0032](#), [Marie Corr](#))

### **Chief Executive's Response**

The NTA recommendations in relation to reference in the text to the emerging Greenhills to City Centre Bus Corridor, transport hub and the Greater Dublin Area cycle network is acknowledged and accepted. Text to be amended accordingly.

SDCC is committed to the delivery of the proposed transport interchange for Tallaght. This is reflected in the text of Section 2.2.3 of the Plan which contains objectives in relation to this matter. The NTA submission on the Draft Plan also confirms consistency with the NTA Strategy.

Issues around Luas improvement works including alternations to existing routes etc. are matters for TII and the NTA. The changes proposed are not required by TII or the NTA in their submissions and are therefore not provided for in the LAP.

A submission has been made in relation to traffic arrangements around Belgard Station which would have implications for the operation of the Luas. Any alteration to the traffic management at this location will be subject to detailed discussion with TII and the NTA.

In relation to the maintenance of access for all modes of destination traffic to the Square, the NTA supports the overall approach of the LAP in relation to transport and traffic issues. SDCC is satisfied that the best solution for the operation of traffic and public transport in and around the LAP lands is facilitated by the provisions of the LAP. No amendments recommended.

### **N81 National Secondary Route**

A number of submissions make detailed recommendations in relation to the N81, including proposals for creation of a landbridge and proposals to tunnel a portion of the Road. TII note the provisions of the Statutory Section 28 Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities (2012)' and the requirement to comply with same. This submission is supported by the comments of the OPR. SDCC are very much aware of the need to retain the capacity of the N81 but also has a responsibility to provide improved pedestrian and cycle routes across the N81 between the Town Centre, the Park and the Stadium. The details shown in the LAP are indicative only and serve only to acknowledge the need for interventions to facilitate the role of Tallaght as a Town Centre,

particularly in relation to cycle and pedestrian movements. Additional text should be added to Section 2.2.1 making reference to TII Section 28 Guidelines in relation to National Roads, noting the requirement to comply with these and stating that any interventions would be subject to detailed traffic analysis and agreed with both TII and the NTA.

Existing pedestrian bridges will be retained until alternative proposals for enhanced connectivity across the N81 are agreed.

### Chief Executive's Recommendations

- (1) Add text to Section 2.2.3 as follows:

*In particular, the LAP supports the following;*

- *Accommodation of the emerging Greenhills to City Centre Bus Corridor;*
- *The development of a transport hub in Tallaght Town Centre which facilitates ease of access for residents, workers, shoppers and visitors to all public transport services and facilitates seamless interchange between all bus services; between bus services and Luas; and between cycling, bus and Luas; and*
- *Development of the Greater Dublin Area Cycle Network, with particular priority given to route 9A and SO5.*

- (2) Add text to Section 2.2.1 as follows:

*The N81 National Secondary Route traverses the LAP lands. It is an objective of the plan to provide cycle and pedestrian routes which facilitate ease of access across the N81 between the Town Centre and Sean Walsh Park, surrounding residential areas, The Stadium and ultimately the Dublin Mountains. Any future proposed works shall be agreed with TII and the NTA and are required to comply with Section 28 Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities (2012).*

- (3) Amend urban structure in The Centre neighbourhood to north of Belgard Square North to clarify requirement for green amenity route through these lands.
- (4) Remove 'Removed Pedestrian Bridge' from diagrams.

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#### 6.4.2 SECTION 2.2.2 PEDESTRIAN AND CYCLE MOVEMENT

1. The NTA recommends that a clear commitment to the principle of filtered permeability is incorporated into the Plan, and consideration given to the identification of those locations where walking and cycling will be given priority over the private car through the restriction on through movement for the latter. It is further recommended that a policy is inserted which states that permeability projects will be undertaken where required in order to link residential areas by bicycle to the strategic cycling network and by walking and cycling to local services, including public transport. ([TTCLAP0005](#), [David Clements, National Transport Authority](#))
2. TII supports new and enhanced cycleways, including increased cyclist permeability for Luas stop access, however recommends that provision be made for cycle parking at Luas stops in order to facilitate these LAP objectives and avoid ad hoc, potentially dangerous parking. TII recommends specific reference to the need for additional cycle parking be included in Section 8.4.5 of the Draft LAP ([TTCLAP0007](#), [Transport Infrastructure Ireland \(TII\)](#), [Transport Infrastructure Ireland](#))
3. The proposed cycle lane along the length of Ambervale/Birchwood Green is not required when there are cycle lanes from the west and south both of which run beside the road and the Luas track and connect directly to the Cookstown Stop. The green is criss-crossed by three pathways that cyclists currently use. The submission is not in favour of openings at either end of the settled

area, as it is considered it will not be used by cyclists. There are already issues with anti-social behaviour in this area and the opening up of entrances will allow more flow through and it is not welcomed nor needed. There has been little consultation with the residents of Ambervale Cairnwood and they would like to be acknowledged. ([TTCLAP0016](#), [Ambervale Cairnwood Community Group](#))

4. The focus throughout the Draft LAP on creating pedestrian centred spaces and expanding the cycle network is welcome and it is recommended that the LAP include more specific policies, including requirements for new housing and mixed-use developments, pertaining to creating a modal shift away from private car use towards walking, cycling and public transit use. ([TTCLAP0029](#), [Phoebe Duvall, An Taisce](#))
5. It is requested that existing pedestrian links between Old Bawn and the core area and between Whitestown Industrial Estate through to Killinarden are enhanced with greater levels of lighting to extend its usability into the evening. ([TTCLAP0008](#), [Gerard Stockil, TCC, Tallaght Community Council](#))
6. It is considered that all applications for new residential development should be required to pass a permeability test. ([TTCLAP0032](#), [Marie Corr](#))

### **Chief Executive's Response**

The NTA recommendations in relation to commitment to the principle of filtered permeability and engagement in permeability projects is noted and accepted. Text to be inserted in relation to same.

TII recommendations in relation to provision of additional bicycle parking provision at Luas stops is noted and accepted. Text additions to section 2.2.2 and Section 8.4.5 to be made.

Concerns in relation to proposed cycle lanes at Ambervale/Birchwood Green are noted. The LAP does not include specific proposals for additional cycle lanes at particular locations. These are subject to a separate statutory process and detailed design. However, it is an objective of the plan to facilitate and encourage additional cycle and pedestrian movements within the LAP and between the LAP and adjoining areas. The submission in relation to lack of consultation is noted with concern. It is important that local residents are enabled to engage with cycle or pedestrian route alternations within their local area.

Request for additional provisions for modal shift provisions are noted. The focus of the Draft LAP has been to facilitate sustainable urban development. Through the provisions in the Plan in relation to the Transport Hub, Bus Connects, cycle and pedestrian facilities and housing mix, SDCC consider that modal shift is enabled and facilitated. The NTA are supportive of these measures.

Specific submissions in relation to permeability are noted. It is noted that all planning applications, including those involving mixed use development are assessed against a wide range of criteria. The addition of a specific permeability test is not considered necessary. Specific public lighting issues are not matters for the LAP, however, all pedestrian and cycle facilities are required to include provision for adequate lighting. This issue is addressed through the statutory process (Part 8) for the relevant scheme.

### **Chief Executive's Recommendation**

- (1) Add/amend the following text in Section 2.2.2 to highlight 'filtered permeability':

*It is an objective of the Council to encourage the principle of filtered permeability at suitable locations throughout the LAP area.*

*The Council will encourage pedestrian and cyclist priority, i.e. 'filtered permeability', to be demonstrated in development proposals, particularly those incorporating proposed cycle*

routes, strategic amenity routes and tertiary routes. This may be in the form of 'home zones' which are designed primarily for people, restricting through routes for vehicular traffic or other appropriate solutions.

*SDCC will facilitate and engage with permeability projects where required in order to link residential areas by bicycle to the strategic cycling network and by walking and cycling to local services, including public transport.*

- (2) Add provision to extend Luas bicycle parking provisions to all Luas stops within the plan lands to Section 2.2.2:

*It is an objective of the Council to extend Luas bicycle parking facilities already provided at the Terminus Luas stop and other Luas stops located with the LAP area.*

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#### 6.4.3 SECTION 2.2.3 PUBLIC TRANSPORT

1. Supports provision of a first-class interchange between Luas and Bus at The Square and includes suggestion for the design of the proposed Transport Interchange based on an example from Munich, stating that it should also include clear and covered walkways between bus and Luas and facilities for drivers. ([TTCLAP0001](#), [Kevin Cannon](#))
2. NTA states that the Transport Strategy envisaged that the growth of Tallaght would be served by an expanded bus network and existing Luas service. NTA is of the opinion that the level of growth shown in Table 2.1 of the Draft LAP, which is significantly higher than previously envisaged, over the long term beyond the lifetime of the LAP, can be accommodated by a combination of the following:
  - Increased capacity on the Luas Red Line;
  - BusConnects and on-going bus service capacity enhancements; and
  - Further measures derived from the review of the Transport Strategy. ([TTCLAP0005](#), [David Clements, National Transport Authority](#))
3. Developments within the 500m Luas catchment should be directed to TII's 'Code of Engineering practice for works on, near, or adjacent the Luas light rail system' in the interests of maintaining a safe and efficient Luas service. TII recommends that specific reference should be made to this Code in Section 9.2 of the Draft LAP. The design of open space at Cookstown Reservoir should not conflict with Luas operations and safety through the creation of unplanned crossings or interruption of the Luas line. Design of this space should be in consultation with TII and this should be clarified in Section 2.7.3 or 3.3. ([TTCLAP0007](#), [Transport Infrastructure Ireland \(TII\)](#), [Transport Infrastructure Ireland](#))
4. The proposed transport interchange is welcomed, but suggests that it should be sheltered and of high design quality and act as a catalyst for all other buildings. ([TTCLAP0049](#), [Tallaght Community Council](#))

#### **Chief Executive's Response**

A number of submissions put forward suggestions around the design and layout of the Transport Interchange. There are a number of stakeholders involved in this process including SDCC, NTA, TII, landowners and the public. There are a wide range of requirements which must be met. The function of the LAP is to ensure adequate provision and space is provided to ensure its development in conjunction with a well connected public area which facilitates interchange by all between the modes of transport. The final layout and design will be a matter for the NTA and the range of stakeholders

involved. SDCC will continue to facilitate the delivery of this extremely important project with all stakeholders.

The NTA's comments in relation to the future growth of the LAP in public transport terms is welcomed. It notes that future growth can be accommodated through increased capacity on the Luas Red Line, BusConnects and on-going bus service capacity enhancements and further measures derived from the Transport Strategy.

TII's comments in relation to need to refer to TII's Code of Practice where developments are within 500m of Luas catchment are noted and accepted.

The concerns of TII in relation to the future development of Cookstown Reservoir are noted, however it is not envisaged that proposals arising from the use of the Cookstown Reservoir will impact on the operation of the Luas line. In relation to possible future public transport provisions arising out of LAP where the Luas may be affected SDCC will ensure that any proposals must be carried out in consultation with TII and other relevant public transport bodies.

### Chief Executive's Recommendation

- (1) Add following note to Section 2.2.3:

*Any development arising from the provisions of the plan and which may have a direct impact on the Luas line or its operation must be agreed with TII and all other relevant stakeholders.*

- (2) Add following text to Section 9.2:

*Where development is located within a 500m catchment of the Luas line, the provisions of TII 'Code of Engineering practice for works on, near, or adjacent the Luas light rail system' must be adhered to.*

## 6.5 SECTION 2.4 LAND USE AND URBAN FUNCTIONS

### 6.5.1 SECTION 2.4 LAND USE AND URBAN FUNCTIONS

1. NTA is satisfied that the Draft LAP is consistent with the Transport Strategy, in particular the principles of land use and transport integration, specifically with reference to the following:
  - Development close to high capacity public transport, and
  - Sequential development, including reuse of brownfield sites. ([TTCLAP0005](#), [David Clements, National Transport Authority](#))
2. The submission from the Office of the Planning Regulator (OPR) notes potential for conflict between the provisions of the draft LAP concerning residential development on lands zoned objective EE (enterprise and employment) at Whitestown ('The Centre' neighbourhood area) and at Greenhills, which land use zone would appear to exclude residential development. There is also an apparent degree of conflict between the REGEN land use zoning objective under the plan and the nature of development and the mix of uses proposed for neighbourhood area 'The Centre' at Whitestown and also at the neighbourhood zone 'TUD/TC' zoned Town Centre, as envisaged under s2.5. It is a recommendation of the OPR to resolve the apparent inconsistencies. ([TTCLAP0028](#), [Maude Ni Bhrolchain, Office of the Planning Regulator](#))
3. The submission indicates that key to Tallaght's future as a centre of employment has to be to ensure a good mix of business usages. It is noted that there are concerns over proposals such as the implementation of mixed industrial and housing and issues that can arise with regard to objection to uses and vacant sites etc. The future development of the Square Town Centre with leisure and retail employment is welcomed and it is considered that industrial units could be

updated also in order to provide additional employment. The submission considers that the development of commercial office blocks should be investigated as they can provide high density employment. The submission highlights the benefits of co-locating employment and housing such as strong employment pool, reduction of commuting, working locally and aids to address sustainability goals. It is considered that there are a number of sites within the plan that can achieve this. ([TTCLAP0025](#), [Peter Byrne, South Dublin Chamber](#))

4. There are successful and viable light industrial uses currently operating at this site in Cookstown and some of the commentary in section 2.4.3 of the Draft LAP is welcome which discusses the changing nature of the area. However, a supportive planning context to intensify existing operations at this location would be welcomed. Minor additions to existing industrial uses should not be impeded by objectives or policies within this LAP. Clarity and some noted flexibility is sought on this point regarding the principle of improvements to existing industrial operations. ([TTCLAP0042](#), [John & Deirdre Mulvey, John & Deirdre Mulvey](#))
5. The fundamental change in land use in Tallaght is proposed in the draft LAP is the transition from industrial/enterprise and employment uses in Cookstown, Broomhill and Greenhills to residential/mixed use. The rationale for this is questioned and it is suggested that insufficient research has been carried out by SDCC to determine the economic impact of proposed change in land use and appears that SDCC is advocating the removal of strategic enterprise and employment lands without provision to relocate them elsewhere in the County. It is submitted that the intention to rezone from industrial/enterprise/employment lands in the new neighbourhoods contradicts overarching objectives of the Draft LAP. Planning applications lodged in this area to date, have not proposed meaningful mixed-use schemes, but are predominantly residential with a token shop or café to aid the argument that the schemes are not completely residential. ([TTCLAP0019](#), [Gerard Stockil, TCC TTCLAP0033](#), [Zara Stockilk TTCLAP0036](#), [Tara De buitlear](#))
6. The submission relates to a site at Belgard Gardens within 'The Centre' in the draft LAP and recommends clarity on the intention of the Mixed-Use A and B designations to ensure that Residential uses are specifically captured within any designation applied to the Regeneration zoned lands. ([TTCLAP0047](#), [Atlas GP Limited, Atlas GP Limited](#))
7. Proposals to treat 48% of the town centre area (Cookstown, Broomhill and Greenhills) as "Regeneration, residential-led" is simply too much land to allow sit under too wide a permitted land use range where residential-led development appears to be favoured over enterprise and employment creation. It is submitted that land-use in Cookstown should specifically favour enterprise and employment creation through zoning, specific objectives or permitted land uses, with particular reference to medical, life sciences, bio-medical, research, etc. adjacent to the hospital. ([TTCLAP0049](#), [Tallaght Community Council](#))

### **Chief Executive's Response**

It is welcomed that the National Transport Authority have confirmed that the principles of the Plan, in the form of development adjacent to high capacity public transport and reuse of brownfield lands, are consistent with the Transport Strategy for the Greater Dublin Area.

A number of submissions have raised concerns with the proposals for a broad change in the land use and character of existing industrial/enterprise and employment to residential. For clarity, the Local Area Plan does not propose to change the zoning objectives of lands as determined by the County Development Plan. Proposed developments must, in the first instance, comply with the zoning objective and related use classes contained in Section 11.1.0 of the County Development Plan. The Local Area Plan provides more guidance on the type of development in particular areas that will be sought and considered by the Planning Authority and the future character of areas, particularly more guidance for Regeneration zoned lands which may be enterprise and/or residential led regeneration, but does not change the zoning objective of the site. Land use zoning objectives may only be changed

through the relevant statutory procedures relating to the making, reviewing or amendment of the County Development Plan, which is a democratic decision of the Elected Members of the Council and includes public consultation. Section 2.4.1 of the LAP clearly states the land use zoning objectives for the land. In the interests of clarity, it is proposed that figure 1.2 be replicated in section 2.4.1. It is acknowledged that figure 2.5 might create some confusion, as it shows the proposed mixed-use frontages overlaid on the existing urban function map (existing uses) across the LAP lands. It is therefore proposed to amend figure 2.5 and figures 3.2, 3.6, 3.9, 3.12, 3.15, 3.18, 3.21 and 3.24 and replace with drawings which clearly indicate proposed mixed frontages across the LAP lands

In accordance with the objective and principles of the LAP, it is intended that the areas of Broomhill and Greenhills should remain primarily industry/enterprise and employment areas with, as indicated in the Draft LAP, a limited amount of residential development considered in these areas at certain locations subject to integrating effectively with existing surrounding uses.

An employment survey of the LAP lands is being carried out by the Council to assess the numbers employed in various areas and the number of workers per floorspace in the area. Preliminary findings have revealed that employment levels in office and retail uses across the various neighbourhoods in terms of workers per sqm floorspace are generally in accordance with the recommended guidance for the office services, however the densities for retail services is higher (as per UK guidance HCA Employment Density Guidance 3rd Edition (2015)). The worker density for Industrial uses across the LAP lands are generally significantly lower than recommended guidance; at 1 worker per 243 sqm in Cookstown, 1 worker per 221 sqm in Broomhill, 1 worker per 595 sqm in Greenhills, 1 worker per 243 sqm in Cookstown. This reflects a high rate of floorspace and comparatively low numbers of workers which is not considered to be an efficient use of building space and supports the proposals for more efficient use of lands through regeneration.

It is considered that the ambitions and proposed functions of Broomhill and Greenhills are clearly established in the LAP in its current form. Given the limited potential for residential development in Broomhill and the promotion of this area for high intensity employment, it should be clarified in the LAP that residential development that will be considered in this area under the proposed LAP should be directed to Airton Road, particularly the southern side of Airton Road, with some potential along Greenhills Road subject to enhanced public realm, connectivity, mixed-uses and integrating effectively with existing surrounding uses.

With regard to Cookstown, the Planning Authority is satisfied that it is appropriate that this area transitions to a predominantly residential led area in the long term due to the proximity to high capacity public transport, Tallaght Town Centre, existing major employers, educational and civic facilities and amenities, among a number of other factors. Notwithstanding this, the Planning Authority also sees significant potential in Cookstown for more intensive employment uses and will seek to facilitate and promote the area for appropriate high intensity employment which can benefit from the strengths of the area.

As noted above the density of employment in the area is very low for industrial uses and the Planning Authority considers the area as suitable for more intensive uses. Research undertaken in the preparation of the Plan indicates that, due to the low density of employment in the area, additional employment can be facilitated in the area through more intensive uses broadly in accordance with the intensity identified in the LAP, while also accommodating a large residential population as indicated. The Planning Authority will support proposals for new and existing businesses which provide for a more efficient use of the subject lands through provision of more high intensity employment.

It is anticipated that the regeneration of Cookstown will be a gradual process over c.20 years or more and the Planning Authority is not seeking to displace existing viable businesses, but to accommodate compact growth and the changing nature of the area that will occur over this period by providing a

framework for the future development of the area, which allows for more efficient use of these lands to support residential and non-residential uses.

The Planning Authority acknowledges existing businesses operating in Cookstown and the valuable contribution they make to the economy and citizens of the County and will seek to retain a large employment base in the area. It is considered that support for existing businesses in this transitional area is reflected in the LAP, particularly Section 2.4.3, and any proposal that comes forward for intensification of existing uses will be assessed on a case by case basis through the development management process.

The provision of genuine mixed-use development which integrates residential and non-residential uses, not confined to a shop or gym at ground floor level, should also be sought and there is potential for existing business and employers in the area to be accommodated in the regeneration of Cookstown. This relates to the issue of mixed-use frontages which is addressed below.

Proposals for non-residential development will generally be assessed on a case by case basis and the Planning Authority will strongly encourage development proposers to incorporate existing businesses where redevelopment is proposed which can be appropriately accommodated in a mixed-use area with a substantial residential component.

It should be clarified that residential buildings with non-residential uses at lower levels will be treated by the Planning Authority as residential buildings for the purpose of the building heights strategy of the LAP.

A number of submissions highlight issues with vacancy in the area and further submissions highlight the issue of displacement of existing uses, while proposals for development/redevelopment are put forward. In order to address issues around vacancy of existing buildings and displacement of existing uses due to possible speculative development, the Planning Authority will seek to utilise existing tools available in order to avoid vacancy in the area and encourage the retention of existing uses or more efficient use of lands. In this regard, tools, such as the Vacant Sites Levy, will be actively used by the Planning Authority in the area to identify vacant or idle sites and seek their return to active use.

### **Chief Executive's Recommendation**

- (1) Remove urban functions/uses from Figures 2.5, 3.2, 3.6, 3.9, 3.12, 3.15, 3.18, 3.21, 3.24 to avoid confusion and include alternative base map with 'Mixed-Use Frontages'.
- (2) Reflecting clarification of extent of mixed-use frontages remove the mixed-use frontages indicated at the following locations and other minor amendments to mixed-use frontages:
  - Along the entirety of Broomhill Road within Broomhill neighbourhood,
  - Along the northern side of Airton Road within Broomhill neighbourhood,
  - Along either side of Greenhills Road north of junction with Airton Road, within Broomhill and Greenhills neighbourhoods.
- (3) Add paragraph in Section 2.4 stating that tools available to the Planning Authority, including the Vacant Sites Levy, will be actively used to discourage vacancy.
- (4) Include text in Section 2.4 and 4.2 referring to preliminary findings of employment survey and potential of this area to accommodate additional employment levels in tandem with residential development through more intensive uses, due to low density of workers per floorspace in industrial uses currently prevalent across the LAP lands.

1. A number of submissions question the viability of a large extent of intended mixed-use frontages, presuming this to be commercial and retail uses, across the wider development area having regard to the primacy of the Town Centre and need to avoid ground floor vacancy. It is requested that clarity be provided as to whether residential use is acceptable at ground floor. ([TTCLAP0041](#), [Bartra Capital Property Group](#), [Bartra Capital Property Group](#) [TTCLAP0042](#), [John & Deirdre Mulvey](#), [John & Deirdre Mulvey](#) [TTCLAP0044](#), [Austin McHale](#), [Austin McHale](#) [TTCLAP0012](#), [Sheehan Planning](#), [Sheehan Planning](#), [Irish Life Assurance PLC](#))
2. This submission relates to a site at Belgard Gardens and recommends the omission of the reference to the minimum requirement for non-residential frontages at ground floor level in favour of a more flexible requirement to support activity at ground floor level through a mix of uses. The submission also recommends the application of a 3.5-4 metre floor to ceiling height to be applied only to ground floor non-residential uses located on primary and secondary route frontages. ([TTCLAP0047](#), [Atlas GP Limited](#), [Atlas GP Limited](#))
3. That there is an over-reliance on apartment over retail development in Tallaght as town centre creation/regeneration and requests that more detailed and exact land uses guidance be provided for commercial, industrial/ employment uses and residential individually in Cookstown, Airton and Broomhill. It is submitted that there has been a lack of success with this model in the area with a high level of vacancy at ground floor and that it has not created vibrancy at street level. It is proposed that clear strategic local objectives be set down and perhaps specific areas within Cookstown, where commercial only development is identified. ([TTCLAP0049](#), [Tallaght Community Council](#))

### **Chief Executive's Response**

The LAP does not seek to detract from the primacy of the Square Shopping Centre and existing Town Centre as the retail core of the area. Mixed-use frontages as provided for in the LAP are not intended to be limited to apartments over retail uses. Mixed-use frontages are considered to be an important urban design requirement to create activity and vibrancy at street level at different times of day. The requirement for mixed-use frontages is primarily targeted at specific locations, such as primary and secondary frontages, new parks and squares, etc., as identified in the Draft LAP.

Mixed-use frontages provide an opportunity to accommodate non-residential uses, not limited to a block of apartments over a retail unit or gym, and, furthermore, is an opportunity for proposers of development/redevelopment to accommodate existing businesses operating in the area, which may be affected by the transition of the area to more intensive compact development.

The Planning Authority therefore strongly encourages proposers of development/redevelopment to put forward design proposals which provide the space to accommodate other non-residential uses at lower floor levels, such as offices, community facilities, recreational facilities, etc. and also non-traditional ground floor uses, such as car showrooms and mechanics which are prevalent in the Cookstown neighbourhood and could be accommodated in residential developments subject to appropriate mitigations measures to negate potential impacts on residential amenity.

At streets not specifically identified for mixed-use frontages, the Draft LAP sets out requirements for own door access directly onto streets from residential units at ground floor level generally across the LAP lands, where residential development is proposed.

The areas where mixed-use frontages should be provided should be clarified in the relevant neighbourhood area diagrams and text, particularly as referenced above within Broomhill Industrial Estate to the north of Airton Road, along and off Broomhill Road, which are primarily envisaged as enterprise-led regeneration and should therefore be removed.

## Chief Executive's Recommendation

- (1) Add text to Section 2.4.2 for clarity as follows:

*Appropriate uses at ground floor level on mixed use frontages can include offices, commercial, services, community facilities, recreational facilities, etc. This is an opportunity for existing businesses and facilities in the area which can be suitably accommodated alongside residential uses. The potential to accommodate non-traditional ground floor uses should also be explored, such as car showrooms and mechanics, which are prevalent in the area and could be accommodated in residential developments subject to appropriate mitigation measures to negate potential impacts on residential amenity, provided they are in compliance with the zoning objectives for the area.*

*In the design of non-residential floorspace the development management standards of the County Development Plan should be applied and in particular there will be a need to consider the size and layout of the proposed space to ensure it will offer attractive spaces to businesses. Applicants are encouraged to set out appropriate floor to ceiling heights for non-residential space, that sufficient space for loading and servicing is provided as well as appropriate signage, noise mitigation measures are included, control over the hours of operation is set out, bicycle and operational parking is provided. Applicants should set out how these standards are being addressed through the planning application.*

- (2) Reflecting clarification of extent of mixed-use frontages amend text in Section 2.4.2 as follows:

*Some residential elements ~~are appropriate in~~ will be considered in Broomhills and Greenhills along mixed-use frontages identified in the urban framework; ~~Belgard Road, Airton Road, Broomhill and Greenhills Road~~, subject to integrating effectively with existing uses.*

## 6.6 SECTION 2.6 DENSITY / PLOT RATIO

1. Submission considers that the population targets set for the Tallaght LAP (referred to in Chapter 1) is both appropriate and ambitious. However, it will not be achieved with the proposed development objectives and standards outlined in the draft LAP. Higher densities and plot ratios are required to facilitate the development necessary to meet the population target set out for the plan area. If Tallaght is to achieve the compact growth objectives outlined in the NPF, the RSES and the Apartment Guidelines it will require a densification of well-located brownfield sites. ([TTCLAP0014](#), [Thomas Hennessy, McCutcheon Halley, John Doyle and Paraic Mooney](#))
2. Submission that the plot ratio and building heights proposed for a site on Greenhills Road and opposite Airton Road are inconsistent with the designation of Greenhills Road as an existing/improved primary route. The limitations outlined above will prevent the potential of the site to provide a high-density development to be realised. The submission requests that plot ratio and building heights on these 'Regen' lands be increased. ([TTCLAP0014](#), [Thomas Hennessy, McCutcheon Halley, John Doyle and Paraic Mooney](#))
3. The proposed plot ratio for 'The Centre' at 1.5 - 2.0 is low in relation to the objectives to achieve density adjacent to public transport and to create a high quality mixed-use urban centre at The Square. In Dublin City Council Indicative Plot Ratio standards of 2.5-3.0 apply for the City Centre (which is indicative only and frequently exceeded at key locations subject to context and location), and 2.0-3.0 for Mixed Use zonings. A comparable Dublin City Council plot ratio of 1.5-2.0 applies to Neighbourhood Centres, which are entirely different in nature, scale, and intensity to lands at 'The Centre' and specifically the lands at The Square. The submission specifically requests that the plot ratios and building heights be defined in the LAP and clarified as 'indicative only' and

associated changes to text and tables reflect this. ([TTCLAP0015](#), [Brady Shipman Martin](#), [Brady Shipman Martin, Glenveagh Properties PLC.](#))

4. The South Dublin Development Plan does not refer to plot ratio parameters and it is asserted that the Draft LAP should accord with this position. ([TTCLAP0015](#), [Brady Shipman Martin](#), [Brady Shipman Martin, Glenveagh Properties PLC.](#))
5. Residential density as set out in the Plan is welcomed for Cookstown however concern is raised regarding existing applications for higher density development and the precedent they will set, if granted. ([TTCLAP0048](#), [Belgard Residents Association](#))
6. The Draft LAP does not reflect the significance or development potential of 'The Centre' neighbourhood, and in particular the subject lands which are at the heart of the Town Centre, at the Luas terminus and therefore most suitable location for density and height. The draft LAP should be amended by stating that plot ratio and building height in the draft LAP shall be taken as indicative and removing the no. of storeys specified for building heights, replaced instead by reference to Building Height Guidelines. ([TTCLAP0031](#), [Alan Crawford](#), [BMA PLANNING](#), [The Owners of The Square Town Centre lands](#))
7. The submission highlights that the overarching objective for mixed use development is welcomed, however it is noted that the restriction of 6-7 storeys with a density of 1.5-2:0 is exceptionally low, even accounting for the 20% flexibility at page 23. It is indicated that this simply does not make rational sense in a planning system now driven by the need for much higher density development with much greater heights being achieved. It is further highlighted that the Board is granting permission for developments in Sandyford Business District which are 6-14 storeys in height with plot ratios above 3.0+ (e.g. the Rockbrook Development). There are other examples of higher buildings being granted in suburban locations in the City. ([TTCLAP0020](#), [Tony Bamford](#), [tony bamford planning, SDI \(Tallaght\) Ltd](#))
8. A number of submissions, particularly relating to sites with plot ratios of 0.75-1 indicated, note that this is one of the lowest plot ratios in the area. Concern is expressed to see a specific target and restriction placed on the development quantum achievable at these sites, in the form of reduced plot ratios (compared to Strategic Housing Developments permitted by An Bord Pleanála). Flexibility with regard to plot ratio in the Draft LAP subject to a significant public gain is noted, but is not considered to be applicable to some sites given constrained site size and is, therefore, considered to be seriously restrictive and places a 'blanket limitation' on the development of the sites. Development scenarios are outlined for different plot ratios on a number of sites and it is stated that the proposed plot ratios are contrary to all strategic government guidance. It is requested that the specific plot ratio standards be removed entirely. ([TTCLAP0041](#), [Bartra Capital Property Group](#), [Bartra Capital Property Group TTCLAP0043](#), [Square Foot Property Services Limited](#), [Square Foot Property Services Limited](#), [Square Foot Property Services Limited TTCLAP0044](#), [Austin McHale](#), [Austin McHale](#))
9. It is noted that the LAP seeks to increase the density through the application of plot ratio, building height and Built Form to determine and assess the intensity of development and that each design and layout of each plot will need to take account of its context. The likely restrictions that this might impose on school sites cannot be ascertained until the sites are identified. Therefore, the DES seeks a relaxation in the form of words associated with the final version of these objectives that will provide a degree of certainty for development of schools in the areas they are needed. ([TTCLAP0018](#), [Alan Hanlon](#), [Department of Education & Skills](#))
10. The submission relates to lands which are zoned 'Regen' and identified for mixed-use development in the draft LAP. A Site Development Study prepared by OMP Architects is also submitted to accompany the submission. It is considered that the plot ratio as set out in the draft LAP is very low and conflicts with the proposed building heights, as set out in the draft LAP. It is considered that the specified plot ratio would result in a lower density development than might

be commercially viable. It is noted that in the event that the Planning Authority permit a higher plot ratio range, it is possible that it is overturned by An Bord Pleanála. The submission refers to the Urban Development and Building Height Guidelines (2018) which emphasises the need to deliver sustainable densities on suitable sites. The submission requests that the issue of plot ratio is reviewed and amended to 1.75 or 2.0:1 to be more in keeping with the Building Height Guidelines. ([TTCLAP0012](#), [Sheehan Planning](#), [Sheehan Planning](#), [Irish Life Assurance PLC](#))

11. The submission states that the proposed plot ratio for the Broomhill area is 0.75 - 1.0, which results in an under-utilisation of the site at the corner of Belgard Road and Airton Road, Tallaght, Dublin 24. The submission states that if parts of this site have the capacity to absorb heights of 7 no. storeys as prescribed in the LAP, the plot ratio does not facilitate these heights, thus there does not appear to have been any reconciliation between proposed building heights and proposed plot ratios in the LAP. It is requested that the Planning Authority review the matter before the final plan is published. ([TTCLAP0023](#), [Power Scaffolding Supplies limited](#) , [Power Scaffolding Supplies limited](#))
12. Table 2.0 Plot Ratio Ranges and the associated text appears to offer the primary technical guidance in this chapter that could influence density of development and dictate the scale of development for each neighbourhood. With reference to Residential Density Guidelines 1999, it is stated that plot ratio needs to be used/applied in conjunction with a wider plan for residential densities. It is submitted that more time and research needs to be devoted to establishing a desired density for the proposed redevelopment. The sole application of Plot Ratios to determine densities does not constitute an integrated approach for the new neighbourhoods and if pursued would compromise the Planning Authorities objective to establish a new urban block and urban grain layout. With reference to plot ratios of some of the tallest buildings in Dublin, it is submitted that with plot ratios at a maximum level of 2:1 in Cookstown, tall skyscrapers can be expected to dominate the skyline unless site specific guidance is adopted in order to give context to the plot ratio standards. ([TTCLAP0019](#), [Gerard Stockil](#), [TCC](#))
13. The submission notes that the proposed plot ratio for 'The Centre' is considered to be acceptable subject to the retention of the stated flexibility of up to 20% of the plot ranges where there is a strong design rationale and the development will result in a significant public gain. ([TTCLAP0047](#), [Atlas GP Limited](#), [Atlas GP Limited](#))
14. This large vacant industrial premises at the junction of Airton Road and Greenhills Road is designated a plot ratio of 0.75-1. Whilst this range may be considered reasonable for existing business sites located within Broomhill and would reflect the typical density range of such commercial uses, it is considered too low for available brownfield development sites along primary frontages, which are identified for significant residential and mixed use development and a significant building height uplift. Recent SHD applications granted permission in the Tallaght area had plot ratios of 1.6:1 and 3.42:1. It is considered a reasonable and astute approach that the individual plot ratios identified for Cookstown should also be applied to the Broomhill Neighbourhood and requested that locations along the Primary Frontages (Greenhills Road and Belgard Road) are designated for a plot ratio range of 1.0 to 2.0. ([TTCLAP0026](#), [Trevor Sadler](#), [MCG Planning](#), [Greenleaf Group](#))

### **Chief Executive's Response**

For clarity, plot ratio is not the only development standard to be applied in assessing the intensity or appropriateness of development in the area, as explained in Section 2.6 of the LAP.

Plot ratio ranges are considered to be an appropriate tool for assessing the intensity of development in a mixed-use urban centre and will be used by the Planning Authority in this area to assess development in tandem with height, built form, design and layout to promote an urban design quality-led approach to achieving sustainable urban densities in a high quality urban environment.

Many submissions have made requests for increased densities for specific sites. The strategy for density of development is based on the overall function of the precincts/places within the LAP lands, gradual density increases dependent on proximity of Luas stops, highest density in the urban centre, increased density along arterial, primary and secondary routes and in response to the existing urban context and conservation context in The Village.

The assessment of potential alternative development approaches carried out in the preparation of the Plan, as outlined in Section 6 of the Strategic Environmental Assessment, considered higher densities across the LAP area in accordance with generic application of the 2018 Guidelines 'Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities' for 'Central and/or Accessible Urban Location'. It was determined that by combining the key elements of Alternatives 1 and 3 in particular, the preferred development scenario, which provides for a more varied strategy for heights and density, develops the LAP in a manner that creates the greatest environmental benefits and offers greatest consistency with the Strategic Environmental Objectives, which are the environmental criteria against which the elements of the LAP are assessed.

Notwithstanding this, the density strategy of the LAP provides for high density development across the entirety of the LAP lands. While a range of plot ratios and height ranges are proposed, the lowest plot ratio range provided for an area is 0.75:1 – 1:1 which would be equivalent to 75 – 100 units per hectare, but likely more based on current apartment guidelines, on a residential scheme. The Planning Authority is satisfied that, although on the lower end for the LAP, this is an appropriately high density of development for the area and is comparatively high compared to typical development densities across the Dublin region.

Plot ratio ranges increase to their highest level of 1.5:1 – 2:1 in the most central locations and adjacent to high capacity public transport stops. Furthermore, flexibility is built into the scheme to increase the density of the development where a development provides a significant public gain.

While site specific requests have been made to increase densities, the Planning Authority considers that the approach should be consistent across the LAP and informed by the density strategy, underpinned by the Strategic Environmental Assessment.

Having reviewed the submissions received and the overall density strategy. On foot of this review some amendments to plot ratio standards are recommended. Increased densities may also become more appropriate in some areas as permeability of the LAP lands is enhanced through implementation of the route structure of the LAP and walking distances to high capacity public transport stops, the town centre and major employment destinations become more direct and shorter. In this regard, flexibility above the 0.75-1 range may be considered where it can be demonstrated that the proposed development is within 500m walking distance of a Luas stop.

It is considered that the density strategy of the LAP should reflect the emphasis in the LAP of the primacy of the existing urban centre of Tallaght, the existing built environment that exists there, the existing high capacity public transport networks (and future proposals) and reflect this more accurately in the density strategy. In this regard, it is proposed to provide for increased densities in the Town Centre neighbourhood area, given the proposed location of the transport interchange which will greatly enhance public transport capacity in the wider area.

To reflect the importance of placemaking at key public transport stops and key public spaces, developments which exceed the plot ratio range indicated for a subject site may be considered, subject to exceptional design which creates a feature of architectural interest, a significant contribution to the public realm at these locations and mixed uses at ground floor level.

Flexibility in relation to minimum plot ratio ranges is included in Section 2.6.1 of the LAP and, for clarity, additional text should be included that this relates also to schools and other developments which provide for a significant public gain.

## Chief Executive's Recommendation

- (1) Amend 'Plot Ratio Ranges' in Table 2.0, and subsequent neighbourhood chapters, of the Draft LAP for consistency with the density strategy as follows:

Centre		1.5- <del>2.0</del> 2.5
Cookstown	CT-C	<del>0.75-1.0</del> 1.25-1.5
	CT-F1	<del>1.25-1.5</del> 1.5-2
	CT-F2	1.25-1.5
	CT-G	0.75-1.0*
Village		0.75-1.0*
Broomhill		0.75-1.0*
Greenhills		0.75-1.0*
TUD-TC		0.75-1.0*

*\*Up to 1.5 where it is demonstrated that the site is within 500m walking distance of a high capacity public transport stop (i.e. a Luas stop or high frequency bus stop (i.e. 10-minute peak hour frequency) on a dedicated bus lane.*

- (2) Add the following text below the final paragraph of Section 2.6, page 22:

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

- High capacity public transport stops (i.e. a Luas stop or high frequency bus stop (i.e. 10-minute peak hour frequency) on a dedicated bus lane);*
- The proposed 'New Urban Square' north of Belgard Square North in the Centre neighbourhood;*
- The proposed 'New Urban Square' within the Cookstown neighbourhood; and*
- The proposed Transport Interchange and adjacent proposed 'Urban Space' in the Centre neighbourhood.*

*This provision will only apply to the extent of a site which is within 100m walking distance of the above locations and will only be considered where the Planning Authority is satisfied that provision of the above facilities will be achieved.*

- (3) Amend text in paragraph of Section 2.6.1, page 23 as follows:

*In considering minimum plot ratio for the neighbourhoods, the Planning Authority will have regard to established uses and in general, will allow flexibility in assessing planning applications for extensions to support established uses, schools or other community infrastructure. This is particularly relevant in Whitestown, Greenhills and TUD/TC. The minimum plot ratio will apply to the full redevelopment of any site in the Plan lands.*

- (4) Amend/add text in Section 2.6.1, page 23 as follows:

*The plot ratio and building height of any proposed development shall not normally exceed the maximum plot ratio or building height thresholds for any particular site, block or parcel of land, except where there is a compelling case of a significant public or economic benefit.*

*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;*

- (5) Review development capacity figures referred to arising from proposed changes to Draft Plan and consider splitting to include in various chapters

## 6.7 SECTION 2.6 HEIGHT AND BUILT FORM

1. Submission with interest in a site on Greenhills Road and opposite Airton Road highlights that the previous LAP for Tallaght (2006) provided for higher density/height at their site on Greenhills Road and opposite Airton Road and should be reinstated. ([TTCLAP0014](#), [Thomas Hennessy, McCutcheon Halley, John Doyle and Paraic Mooney](#))
2. The proposed heights as set out in the Draft LAP, while affording some flexibility, do not afford sufficient importance to key site locations, at the heart of Tallaght 'Centre', nor do they reflect current heights at 'The Centre' where 10-13 storeys are achieved. It is further submitted that the height strategy does not deliver on the density objectives of the Draft LAP. The submission specifically requests the following:
  - Remove the statement that buildings over 10 storeys would not generally be supported (Section 2.6.2 page 25).
  - Amend Section 2.6.2 by deleting text which refers to no. of storeys in each frontage.
  - Include the following text at Section 2.6.2: In accordance with SPPR1 of the above Guidelines, building height ranges quoted in this LAP are indicative only and should not be read as maximums. Furthermore, and as per SPPR3 of the Guidelines on Building Height, where an applicant satisfies the relevant performance based criteria, the Planning Authority may approve increased building heights within Tallaght Town Centre. ([TTCLAP0015](#), [Brady Shipman Martin, Brady Shipman Martin, Glenveagh Properties PLC.](#))
3. The real value of the potential for increased height through considered urban design, place-making, movement strategies, and use mix has not been delivered on, in relation to 'The Centre' neighbourhood. Key locations for increased height at 'The Centre' lands should instead reflect existing built environment where heights of 10-13 storeys at this location already exist, real infrastructure investment in Luas, BusConnects/bus transport, use mix and opportunity for place making. It is requested that the Draft LAP broaden the potential for increased height at key locations, subject to key criteria, design parameters and context, within 'The Centre' of Tallaght, and in this regard remove height ranges and height caps for 'The Centre' neighbourhood to reflect its central, connected location and the objectives to increase density to create an urban centre, and removes indicators for 'potential for higher buildings' in the Overall Urban Structure (Fig. 2.4 and Fig. 3.3), and associated text, specifically page 37, and Section 2.6.2 with reference to Landmark Buildings. ([TTCLAP0015](#), [Brady Shipman Martin, Brady Shipman Martin, Glenveagh Properties PLC.](#))
4. Submission states that the Draft LAP does not fully accord with government policy as per Urban Development and Building Heights Guidelines for Planning Authorities (2018), which seek to intensify development, particularly residential development, at key urban locations. It is stated that the ambition for 'The Centre' does not reflect Government ambitions or the ambition of the previous Tallaght LAP. It is sought that the Draft LAP more fully responds to government policy in

determining height parameters. ([TTCLAP0015](#), [Brady Shipman Martin, Brady Shipman Martin, Glenveagh Properties PLC.](#))

5. The issue of building heights and density is recognised as an important factor in plan making and the submission considers that new building heights should be sympathetic to surrounding existing residential developments and that the policy as set out in the LAP should be adhered to. ([TTCLAP0048](#), [Belgard Residents Association](#))
6. Submission relating to the 'former Woodies Site' bound by the Old Blessington Road, Belgard Road and Belgard Square East notes previous meetings with SDCC to discuss the merit of a higher density, taller than medium rise (6/7 storeys) on this central, brownfield site and that they have previously written to the Minister and the Council about the stated position. It is highlighted that little concession is made to the Minister's Guidance on height. The Draft Plan does recognise that buildings taller than 6-7 storeys are appropriate and allows for landmark buildings at The Square Shopping centre and the Council's own offices. It also indicates, with asterix, two corner sites at the south of the central area, as suitable for higher buildings, with an additional 4 storeys (potentially 11-12 storeys in total). It is put forward that this can be extended to sites at the corner of main junctions between primary and secondary routes, such as the Former Woodies (subject of this submission) site which is at the entrance to the Core Shopping area of Tallaght town centre. An Urban design study by Townscape Solutions has been submitted in evidence of same. ([TTCLAP0020](#), [Tony Bamford , tony bamford planning, SDI \(Tallaght\) Ltd](#))
7. The submission raises concerns over issues of vibration with respect to 9 story buildings. ([TTCLAP0045](#), [Máire Ford](#))
8. Building height and overlooking is an ongoing issue for the proper planning, design and development of schools where it is deemed that the school would, or may, adversely affect adjacent residential amenity such as overlooking. The DES seeks a relaxation on this in respect of schools built adjacent to existing development blocks. A school should be considered as a special category of facility whereby its hours of use are regular and reduced, and its functions are primarily inward-focused relative to other uses. Alternatively, where a developer is planning a development adjacent to an identified (or probable) school site, the Department suggests that an onus could be put on the developer to ensure that the Developer's design and layout accommodates overlooking or avoids/reduces overlooking in so far as possible. ([TTCLAP0018](#), [Alan Hanlon, Department of Education & Skills](#))
9. Submission on behalf of landowner in Cookstown requests an increase in the proposed heights for their entire site at Fourth Avenue to between 4 - 7 storeys ([TTCLAP0040](#), [Mark O'Reilly \(Prizeview Ltd\), Mark O'Reilly \(Prizeview Ltd\)](#))
10. A number of submissions strenuously object to the heights indicated for specific sites in Cookstown and Broomhill, which are considered to be inappropriate given the location of these sites in what are considered to be central and highly accessible urban locations, unhindered by constraints, have the benefit of proximity to public transport links and town centre services, along with the opportunity to intensify development and having regard to Government guidance. General concern is expressed regarding provision for 3-4 storey heights in the area in the Draft LAP. It is requested that heights indicated for these sites be increased to 5/6-8 storeys and that flexibility is identified as opposed to strict adherence to the Block Layout. ([TTCLAP0042](#), [John & Deirdre Mulvey, John & Deirdre Mulvey TTCLAP0041, Bartra Capital Property Group, Bartra Capital Property Group TTCLAP0043, Square Foot Property Services Limited, Square Foot Property Services Limited, Square Foot Property Services Limited TTCLAP0044, Austin McHale, Austin McHale](#))
11. The submission relates to a site at the corner of Belgard Road and Airton Road and considers that due to the site's unique immediate context, it has greater potential for additional building height than that currently proposed, with the LAP prescribing heights ranging in height from 3-7 no.

storeys. A scheme which currently is with An Bord Pleanála (SHD process) is considered to be entirely consistent with the scale and height of the Belgard Gardens scheme, which has the same zoning as the subject site and all of the sites further along Airton Road. Beyond the site-specific characteristics, the submission states that the site has greater capacity for additional height, based on current national planning policy.

The submission considers that the NPF is supportive of higher densities close to public transport and that it is clearly demonstrated in the SHD application for the subject site that the proposed development which sits principally at heights of 6-7 no. storeys can be easily absorbed into the site's context and thus maximum heights of 4 no. storeys as prescribed must be considered unsustainable and a waste of scarce zoned urban land and should be considered further to comply with both national planning policy and the specific characteristics of the subject area. ([TTCLAP0023, Power Scaffolding Supplies limited , Power Scaffolding Supplies limited](#))

12. The height limits and plot ratios in the Draft LAP are prescriptive and contrary to National Planning Policy, particularly Urban Development and Building Heights Guidelines Specific Planning Policy Requirement 1, which preclude planning authorities from including blanket numerical limitations on building heights in their statutory plans. They should not feature in the final LAP. If prescriptive height limits and plot ratios are retained in the adopted LAP, SDCC should have regard to the heights and plot ratios of Strategic Housing Development (SHD) approved in the area. ([TTCLAP0013, Chris Browne, Hughes Planning and Development Consultants , Steelworks Property Developments Ltd., Absolute Limousines Ltd., Boherkill Property Developments Ltd. & Hollin Court Development Ltd.](#))
13. The submission requests that the Council remove the 2Ha minimum site size and 10 storey maximum building height outlined in relation to the provision of landmark buildings which it considers to be excessive and overly restrictive, particularly given the fragmented land ownership in Cookstown Industrial Estate and recent National planning policy which discourages prescriptive height limits. It is argued that landmark buildings can be accommodated on smaller sites when their design is of high architectural quality/finish and the landmark component is appropriately designed having regard to the rest of the building/ development. Instead, it is requested that the Council insert the following eligibility criteria in Section 2.6.2 of the LAP: 'Landmark buildings (3-4 storey above typical levels) will be considered where they highlight features such as corners and entrances, are proximate to high quality public transport, do not unreasonably detract from daylight and sunlight levels of the development and surrounding development; and are of high architectural quality/finish.' ([TTCLAP0013, Chris Browne, Hughes Planning and Development Consultants , Steelworks Property Developments Ltd., Absolute Limousines Ltd., Boherkill Property Developments Ltd. & Hollin Court Development Ltd.](#))
14. The submission recommends that section 2.6.2 is amended and figure 2.4 is amended to allow for a baseline height of six to seven storeys within the Central and/or Accessible Urban Locations' and allow for additional heights based on supporting performance based criteria as set out in the Urban Development and Building Height Guidelines for Planning Authorities (2018). The submission goes on to recommend the reinstatement of Landmark and Gateway designations with the allowance for additional height at these locations to be made on a case by case basis and subject to meeting the criteria as set out by Section 3.2 of the Height Guidelines. It goes on to suggest the removal of the statement that buildings over 10 storeys would generally not be supported. The submission also recommends the amendment of the requirement for distances between entrances on the primary and secondary frontages in the Centre to state that distances should generally not exceed 10 metres where possible. ([TTCLAP0047, Atlas GP Limited, Atlas GP Limited](#))
15. The Draft LAP indicates building heights of between 4 and 7 storeys residential, including an additional top storey recessed, at this large vacant industrial premises at the junction of Airton Road and Greenhills Road. It is contended that this particular site is suitable for building height of

up to 8 storeys in the LAP. There is merit in designating Greenhills Road for a similar height range as Belgard Road (both Primary Frontages), given the importance of the route as a public transport corridor, more frequent bus services, the BusConnects project and associated CPO-ing of land resulting in a widening of the public thoroughfare which will require a greater scale of building and urban edge in order to create an attractive and legible streetscape, particularly at the junction of Airton and Greenhills. It is requested that the LAP be amended to designate the frontage along Greenhills Road for heights of 6-7 storeys (+1 recessed) or, alternatively, identify this corner for a landmark building. ([TTCLAP0026](#), [Trevor Sadler, MCG Planning, Greenleaf Group](#))

16. Submission from Ambervale Cairnwood Community Group states that regard and consideration should be given to the residents in the areas as a first priority. The submission indicates that poor planning permissions have resulted in a high-rise development granted in close proximity to residents and their properties who have been living in the area for a long time. ([TTCLAP0016](#), [Ambervale Cairnwood Community Group](#))

### Chief Executive's Response

The Local Area Plan has identified the Tallaght urban area as being suitable for increased density, scale and building heights. There is a positive disposition towards increased building heights in the area. The height strategy for the LAP lands is based on best practice urban design principles with varied heights to provide for a mix of building heights, types and uses with increased height and density at central locations and locations adjacent to high quality public transport nodes. The height strategy provides for a varied, yet legible, skyline which, nevertheless, represent significant increases in height compared to the prevalent character of development in the wider Tallaght area and in South Dublin County generally.

The height strategy is based on the principles of placemaking, density of development and land use functions across the LAP lands. The assessment is based on the principle that higher density must be design-led to create communities people want to live in. In addition, high density does not have to mean high rise. Urban design studies indicate that developments of between 4 and 6 floors, in medium and high-density urban contexts, are optimal for construction, running costs and liveability (daylight, sunlight and usable outdoor spaces like balconies and gardens which aren't overshadowed)

This approach is supported by the provisions of sections 1.12, 1.13, 1.3, 2.3, 2.9, 2.10 and 2.11 of the 'Urban Development and Building Heights: Guidelines for Planning Authorities'. The importance of design quality also underpins the provisions of 'Design Standards for New Apartments –Guidelines for Planning Authorities 2018'. Both documents specify that the purpose of the guidelines is to build on existing standards and guidelines and that these documents must be used in conjunction with guidance previously issued. Specific reference is made to the following;

- Best Practice Guidelines, Quality Housing for Sustainable Communities, (2007);
- Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, (2009); and,
- Design Manual for Urban Roads and Streets or 'DMURS', (2013).

Section 3.8 of the 2018 Apartment Guidelines state *'In the interests of sustainable and good quality urban development these guidelines should be applied in a way that ensures delivery of apartments not built down to a minimum standard, but that reflect a good mix of apartment sizes.'* Both also note the central role that Local Authorities have in carrying out detailed assessments of the capacity of urban areas to accommodate higher density and higher buildings as part of the local plan making process.

The height strategy arises from a detailed urban design assessment of the area addressing amongst others the issues of density and height. The Planning Authority is satisfied that, the height strategy of

the LAP is consistent with the 'Urban Development and Building Heights' Guidelines for Planning Authorities (2018) and the Specific Planning Policy Requirements contained there within. Having reviewed the submissions received and taking cognisance of the recommendation to increase plot ratio standards in the Centre neighbourhood to a range of 1.5:1 – 2.5:1. It is further proposed to clarify the provision that the height standards may be exceeded in the Centre neighbourhood where they reflect the height of existing buildings particularly in the core of the town centre proximate to the Luas Terminus and The Square Shopping Centre. In accordance with the Height Guidelines, the Local Area Plan actively promotes the Centre neighbourhood as a suitable location for increased heights.

It should be clarified that residential buildings with non-residential uses at lower levels will be treated by the Planning Authority as residential buildings for the purpose of the building heights strategy of the LAP.

The provision for additional heights on sites which exceed 2ha is an exception, rather than the rule, which is reflective of the ability of larger sites to establish their own identity in terms of height and design and provide for an appropriately designed transition upwards in height. SDCC is aware of the fragmented nature of ownership of lands in Cookstown and rather than being a reason for removal of this, it should act as an incentive for landowners to collaborate and put forward more comprehensive development proposals for larger areas across multiple sites in the interests of designing more holistic and orderly development.

The statement that buildings over 10 storeys will generally not be encouraged merely reflects the heights strategy for the LAP which provides for higher than 10 storeys at particular locations and it is considered that this statement should be removed.

There appears to be some confusion that where heights are indicated they must be achieved on site. A range of heights would be expected on any sites leading 'up to' the indicated heights. It should be clarified that heights may be 'up to' the heights indicated in the height strategy.

### Chief Executive's Recommendation

- (1) Clarify that the heights provided for in the LAP, including diagrams, are 'up to'.
- (2) Add following heading and text to section 2.6.2 before '**Landmark Buildings**'

#### **The Centre**

*The height standards set out above may be exceeded in the Centre neighbourhood where they reflect the height of existing buildings, particularly in the core of the town centre proximate to the Luas Terminus and The Square Shopping Centre, subject to Section 2.6.*

- (3) Include new height band for The Centre of 7-8 storeys (+1 recessed) residential, 6-7 storeys (+1 recessed) non-residential.
- (4) Amend section 2.6.2 '**Landmark Buildings**' as follows:

Move the final paragraph under '**Landmark Buildings**' to be the first paragraph.

*In the interest of place making and improving legibility, Landmark Buildings are permissible at key locations that will punctuate urban areas. In general, buildings that exceed the prescribed general buildings heights should only be provided at the locations indicated as having 'Potential for Higher Buildings' in the Building Height Strategy (see Figure 2.4) and at locations adjacent to the key public transport stops and key public spaces identified in Section 2.6.*

*A 2-~~3~~4 storey increase on the above typical levels may be considered for key or landmark sites or where sites exceed 2ha in area and can establish its own identity (see Section 8.2 Implementation). ~~Buildings over 10 storeys would generally not be supported~~*

- (6) Include minor amendments to the block plans as appropriate within the final framework plan.

## 6.8 SECTION 2.6 DESIGN, BUILT FORM AND FINISHES

1. The use of render on the exterior of buildings on new buildings ages poorly with many stains creating a very poor external impression of the building and the whole area e.g. Westgate. In this context it is requested that the Council review the appearance of certain buildings in the town centre which have been rendered in the past and now have smears. Such building creates a negative image of Tallaght and it is requested that the Council implement a scheme which will ensure that the smears on rendered buildings are removed. ([TTCLAP0008](#), [Gerard Stockil, TCC, Tallaght Community Council](#))
2. The emphasis of the draft LAP is on buildings to integrate with its surroundings and to further integrate with the concept set out in the urban framework. The emphasises on good design, iconic or unique high quality design in the plan is directed at landmark buildings and it is requested that the tone of the Draft LAP needs to change to encourage high quality design for all development proposals, in order to achieve the best quality urban expansion. ([TTCLAP0019](#), [Gerard Stockil, TCC](#))
3. Submission makes comparisons to other Local Area Plans which identify a number of key development sites and give a specific design brief and visual context for each one. TCC would advocate that kind of approach is applied in the draft Tallaght LAP in order to provide a clearer brief for developers and a clearer vision for community members in relation to what kind of development is being sought by the local authority. ([TTCLAP0019](#), [Gerard Stockil, TCC](#))
4. There is a distinct lack of a clear, identity creating design statement for the town centre. The imagery included in the draft plan, with particular reference to figure 2.8, to outline what is expected is well below what the community expect or want in design terms for dominant buildings along key frontage areas in the County Town. Currently Tallaght Cross and Cookstown Way has created a very linear, corridor streetscape design, with no architectural interest or value in any buildings. The submission requests insistence on high quality and interesting designed buildings for the County Town, which needs a detailed, high quality and ambitious design statement which doesn't rely on height and density to create a presence. The proximity to and views of the Dublin mountains and waterways should be reflected in the design of any new buildings, using the best in class materials to create a quality streetscape design. ([TTCLAP0049](#), [Tallaght Community Council](#))
5. It is considered that more imaginative solutions to increasing green spaces in apartment complexes needs to be explored. Sample provided of an apartment development in Stockholm Sweden ([TTCLAP0037](#), [South Dublin Conservation Society, South Dublin Conservation Society](#))

### Chief Executive's Response

A number of submissions raise concerns about the quality of the urban design approach taken, requirements in relation to building finishes and failure to provide guidance except in relation to landmark buildings. A number of submissions advocate the use of the concept of identifying key development sites. Particular reference is made to the failure of Figure 2.8 to provide any design guidance. It is also noted that more imaginative approaches to dealing with increasing green spaces in apartment complexes is required.

It is noted that the Local Area Plan sits within the context of the County Development Plan and all of the provisions of the CDP in respect of Development Management standards apply to the LAP. Attention is also drawn to the provisions of Section 2.6.3 of the LAP which provides guidance on block form and size and Section 2.6.4 which addresses the external finishes and appearances. Attention is also drawn to Section 9.2 of the LAP which addresses Design Criteria and Design Statements in detail.

By way of clarification Figure 2.8 is incorporated solely to explain the concept of Urban Grain. It is noted that this style of drawing is not used elsewhere in the LAP document. The request to use the Key Development Site approach is noted. It is considered that this approach is not appropriate in this instance. It is considered that the provisions of the plan are adequately presented.

In terms of Building Setback, some clarification is recommended in the interest of consistency.

### Chief Executive's Recommendation

- (1) Remove lower portion of figure 2.8, the upper portion of Figure 2.8 adequately demonstrates the concept of Urban Grain.
- (2) Amend Section 2.6.2 '**Building Setback**' as follows:

*Development across the Plan lands should present strong building frontages close to street edges, except where otherwise identified to provide for Green/Blue Infrastructure, parking, wide footpaths, etc. Setbacks from the street edge should therefore be minimised.*

## 6.9 SECTION 2.7 PUBLIC REALM AND OPEN SPACE

1. The upkeep and maintenance of this area of Tallaght is highlighted as being poor, foot paths, wall boundaries, industrial type railings, litter and graffiti are all shabby in appearance and area stark contrast to the photos shown in the plan. It is noted that the boundary walls on Ambervale Cairnwood/Cookstown need to be pebble dashed and finished professionally. Similarly, the pathway across the green needs to be re-laid urgently as potholes are now evident. The submission suggests that curbing on either side of pathway may be of use as it would discourage motorbikes from this green. In addition, planting is suggested for this open space to provide a more attractive green and to discourage graffiti. It is highlighted that the future development of the estates of Springfield should not be disconnected as they have been ignored for too long. ([TTCLAP0016](#), [Ambervale Cairnwood Community Group](#))
2. There is a need for an objective to ensure that all new developments have 'out front' landscaping, water features, pocket parks and other measures to soften the impact of excessive concrete. There is a need for a consistent design standard for the town centre with a high-quality durable specification for bollards, bins, benches, flower receptacles and streetlights. Solar powered units should be part of the solution. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
3. The submission highlights the contrast in public realm areas which are maintained and those that are not. The submission highlights some examples of where public realm aspects are poor and are in need of upgrading/maintenance. The submission highlights the difference between some poor public spaces in comparison to the excellent public parks. The submission indicates that public spaces are very important in creating a sense of place, pride and making it a better place to live. ([TTCLAP0025](#), [Peter Byrne](#), [South Dublin Chamber](#))
4. A number of submissions relating to sites which include part of pocket parks welcome the flexibility regarding pocket parks in Section 2.7.2 of the Draft LAP and request that the flexibility associated with these pocket parks be noted on all diagrams where this provision is referenced. It is requested that provision be included in the LAP to offset provision of pocket parks against requirements for public and private open space and development contributions. An initial design proposal on one site proposed open space at the location identified in the Draft LAP, but altered the location based on response from the planning authority. It is requested that the local authority take a lead role in the provision of public open space given the fragmented ownership in

Cookstown. ([TTCLAP0041](#), [Bartra Capital Property Group](#), [Bartra Capital Property Group](#) [TTCLAP0044](#), [Austin McHale](#), [Austin McHale](#))

5. The submission notes 'deliver a mix of new open spaces'. The submission expresses concern regarding a green area on Cookstown Way whereby the upgrading of that path has been sought for many years. The submission highlights a second area to the top of the reservoir on Second Avenue and questions if these have been included as 'new open spaces'? ([TTCLAP0045](#), [Máire Ford](#))
6. There is an apparent inconsistency in the Draft LAP with open green spaces (zoned 'OS' in the County Development Plan) apparently identified for mixed use development in Figure 2.4 of the Draft LAP. It is suggested that the green space at Ambervale should be excluded from the LAP boundary. ([TTCLAP0049](#), [Tallaght Community Council](#))
7. It is requested that interesting Public Art which draws from the rich heritage of the County Town is provided in the plazas. This would illustrate and raise awareness of Tallaght's heritage, as well as creating a reason to visit plazas to enjoy / see it and perhaps have a coffee / food. It would also help tourists move around and support a footfall for the expected retail units and eateries at ground level. As an Arts and Culture hub, the County Town should be running annual competitions for outdoor park, public realm and plaza art installations, sculptures and soft landscaping. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
8. It is requested that a standout 'outdoor performance area' near the Arts hub (Civic Theatre and Rua Red) is identified and built. This would attract more footfall to the area and create an unusual performance area. There is an opportunity to make it a 'must visit' venue or amenity which could double up as a farmer's market/festival area. It is suggested that there is a competition for the project to attract the best minds to the project. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
9. The submission recommends the amendment of requirements for fine urban grain blocks to allow for the use of design features, external materials and massing in order to express the urban grain and to provide a clearer indication of the urban grain requirements as set out by Figure 2.4 relating to overall urban structure plan. The submission also requests to include the provision of new high-quality public realm within the requirement for meeting the 10% public open space provision for development sites. ([TTCLAP0047](#), [Atlas GP Limited](#), [Atlas GP Limited](#))
10. It has not been demonstrated that the subject site in Cookstown is the optimal location for an urban square. There is no evidence, for example, of a Sequential/Urban Design Assessment having been undertaken to identify the optimal location for such a Square, and the Draft Plan acknowledges that a Public Realm Strategy has not been prepared as part of its evidence base. Furthermore, the relative paucity of new open space provision in other parts of the plan area is quite striking. ([TTCLAP0027](#), [Ed Barrett](#), [Gravis Planning](#), [Print and Display Limited](#), [Downtree Investments Limited](#), [PD Visual Limited \(T/A P&D Visual\)](#) and [Westside Press Limited](#))
11. It is considered that the Council must ensure correct spelling and consistency of spelling of place names on road signage within the plan area. ([TTCLAP0032](#), [Marie Corr](#))
12. It is considered that Native trees should be prioritised in all tree planting, including in the pocket parks and urban spaces, along with native shrubs and any hedge planting. ([TTCLAP0037](#), [South Dublin Conservation Society](#), [South Dublin Conservation Society](#))

### **Chief Executive's Response**

In respect of design issues raised in a number of the submissions, it is noted that the Local Area Plan sits within the context of the County Development Plan and all of the provisions of the CDP in respect of Development Management standards apply to the LAP. Attention is drawn to Section 2.6.4 which

addresses the external finishes and appearances. Attention is also drawn to Section 9.2 of the plan which addresses Design Criteria and Design Statements in detail. It addresses the content and detail of Design Statements in detail. Residential developments of over 20 units or more and commercial development of 1000m<sup>2</sup> or more are required to be accompanied by a Design Statement. It is considered that the Design and public realm issues raised in the above submissions are adequately addressed through the County Development Plan and the provisions of the LAP.

It is noted that the maintenance of public areas which are taken-in charge is the responsibility of the Council, hence the better quality of this maintenance. Maintenance of public spaces within developments is normally the responsibility of the relevant Management Company. Unfortunately, the LAP itself cannot ensure the enforcement of responsibilities of independent Management Companies. This is a matter for planning enforcement. However, the concerns raised are noted and will inform the implementation of the finally adopted plan.

Where existing roads and footpaths are primary access routes between a proposed development site and public transport nodes or facilities such as shops, cultural centres and the town centre area generally, it is a requirement of the LAP that public realm and road (including footpath) improvements are carried out by the developer as part of the development to ensure that future residents (cyclists and pedestrian in particular) have direct, safe and secure access to public transport and services.

The LAP does not propose changes to the zoning provisions made in the South Dublin County Development Plan 2016-2022. See Figure 1.2 and Section 2.4.1 of the LAP. The zoning provisions of the CDP will take precedent.

Submissions in relation to the delivery of an outdoor performance area and improved signage within the LAP area are noted. Signage issues are a matter for the Economic Development Department under their Tourism Strategy remit. The provision of an outdoor performance area would be welcome addition to the Town Centre Area and would be considered as part of any future proposal for the Plan area. It is noted that permission has already been granted for such an area as part of a scheme to provide a mixed-use residential development at Belgard Square North as part of a proposed cultural centre (Reg Ref SHD3ABP-303306-18).

In respect of requested off sets of development contributions against open space provisions, this is a matter which will form part of the review of the Development Contribution Levy Scheme for SDCC.

In respect of requested off sets against on site provision of open space against provision of pocket parks, etc, identified in the urban structure, this will be considered on a case by case basis in development proposals.

As considered appropriate by the Council public art competitions will be carried out in relation to the future development of public squares within the LAP lands.

The concerns raised by specific community groups with the LAP area are noted and acknowledged. Issues around upkeep, maintenance and planning of public parks are a matter for the Public Realm Staff of the Council. In respect of securing links to areas adjoining the LAP lands it is a central objective of the LAP to secure where possible cycle and pedestrian links to adjoining areas.

Submission questioning the rationale for open space provision across the LAP are noted. The plan making process included a detailed Area Level Analysis (See Appendix 2) followed by a layered approach to core elements of the emerging Town Centre; these addressed amongst others issues such as; access and movement, connectivity across the LAP lands, identification of primary, secondary and tertiary frontages, heights and densities, public open space and public realm. The open space/urban space provisions within the plan have emerged as part of the overall process. The LAP is supported by a Social Infrastructure Audit the focus of which is the quantitative rather than qualitative nature of open and public space provision. The Urban Design approach based on the 'Place Making Model' and on recognised urban design principles rightly identifies the need for an Urban Square in the northern part of the Cookstown neighbourhood located in a position which is easily accessible from both the

Belgard and Cookstown Luas stops and the higher density residential/commercial development which is expected to be attracted to this area. It is acknowledged that its exact location is not tied to the site shown on figure 2.4. The phasing provisions of the LAP provide for its delivery by developers of lands adjoining the junction of the Cookstown Road and Second Avenue and delivered jointly on lands within their ownership.

The decision to include specific dimension requirements for urban squares and pocket parks across the LAP lands was made to ensure the provision of appropriate open spaces across the LAP lands. However, on review of submissions and further consideration, it is considered inappropriate to include exact dimensions as at detail design stage of blocks or sites such specific requirements may impede the delivery of an appropriate urban design outcome.

In respect of pocket park provision and the phasing requirements set out in the relevant Neighbourhoods it is considered that a description of 'pocket park' and its function in urban design terms be included in the text of this section of the plan.

There are no accepted dimension requirements for these parks. However, they serve a particular purpose in the place making of an area and must be addressed as part of the Urban Design Statement in term of the specific areas they will serve. These pocket parks will still be required to be provided to serve the blocks and areas indicated but specific requirements around exact dimensions will be removed. However, phasing will still require either the entire pocket park or percentage thereof to be provided in tandem with delivery of units or bed spaces.

In respect urban grain provisions, it is considered that the text included in Section 2.6.2 adequately explains the concept. The public realm elements to proposed open space areas will be addressed as part of the relevant Urban Design Statement.

### Chief Executive's Recommendation

- (1) Amend drawing 4.2 and all associated drawings to clarify that the location of the Cookstown Urban Park is indicative only but indicating it must be delivered jointly by developers on lands in their ownership and in the vicinity of the junction of Cookstown Road and Second Avenue provide and within walking distance of public transport nodes and all higher density development in the northern section of Cookstown.
- (2) Add provision for Council to carry out public art competitions for future proposed public squares within the plan lands as deemed appropriate.
- (3) Update the following for consistency:

*It is an objective of the Council to prepare ~~the policy of the council to develop and implement a detailed~~ public realm strategy for the plan area.*

- (4) Amend Section 2.7.2 for consistency as follows:

*Where identified in the open space strategy and Urban Framework for the LAP, the Planning Authority will seek the delivery of identified areas of public open space. The proposed 'New Urban Squares' ~~are more fixed in nature~~ will be central and vital community resources for new communities and should be provided in accordance with the criteria set out in Section 8.4.2 of the LAP in the vicinity of the locations identified. The Council will seek the delivery of these areas as public open spaces in accordance with phasing requirements, working with landowners to provide these spaces. ~~providing a vital community resource for new communities.~~ 'Local Pocket Parks' and smaller 'Urban Squares' are more flexible in nature in terms of their location and their delivery will be sought on a site by site basis in the development management process, unless reasonable alternatives are proposed and it is demonstrated how these will be achieved.*

- (5) Amend text in Section 2.7 to include description of pocket park and requiring their function, dimensions and sizing to be addressed in the relevant Urban Design Statement:

*A 'pocket park' is a small outdoor space for passive and small-scale active recreation, similar to a small park or square and plaza, as defined in the County Development Plan.*

*'New Urban Squares' and 'Urban Spaces' provide for civic amenity in usually high-density areas with varying degrees of passive and active recreation, similar to a square and plaza, as defined in the County Development Plan.*

- (1) Amend text in phasing tables in Chapter 8 in relation to pocket parks and urban squares removing details of dimensions of parks. All housing and bed space quantum associated with the delivery of pocket parks will be rationalised and updated, where necessary.

## 6.10 CHAPTER 3: NEIGHBOURHOODS

### 6.10.1 SECTION 3.2 THE CENTRE

1. Submission with interest in The Square Town Centre outlines that they are seeking to redevelop lands at the Square Shopping Centre, in partnership with the owners of The Square. The submission states, with reference to the Draft LAP, that The Square is a key strategic site and represents a significant opportunity for the area. It is submitted that this significant opportunity can be better delivered on, with the adjustments to the Draft LAP. ([TTCLAP0015](#), [Brady Shipman Martin, Brady Shipman Martin, Glenveagh Properties PLC.](#))
2. The proposed Urban Space / Transport Interchange at The Square as currently presented in the Draft LAP is excessive in scale and will be unattractive in form, and use. It is noted that the exact 'land take' is subject to Section 8.4.5. Whilst the transport interchange project is supported in principle, it is requested that the proposed Urban Structure for 'The Centre' be annotated as 'indicative only' and amended such that flexibility is afforded to the design of the intended Transport Hub and Interchange land identified, while responding to the overarching objective to create an urban centre at lands at The Square. This would allow the development of a building at this location, as per the previous Tallaght LAP, which would serve to contain the urban space and deliver a strong streetscape on Belgard Square West. ([TTCLAP0015](#), [Brady Shipman Martin, Brady Shipman Martin, Glenveagh Properties PLC.](#) [TTCLAP0031](#), [Alan Crawford , BMA PLANNING , The Owners of The Square Town Centre lands](#))
3. Submission with interest in The Square Town Centre welcomes the opportunity to comment on the Draft LAP and is committed to deliver on the consolidation and enhancement of The Square Shopping Centre lands in accordance with the vision of the LAP. The submission expresses support for the submission made by Glenveagh Properties PLC, their preferred development partner, in relation to the residential elements of the overall development. Specific amendments are requested to the block layout and urban spaces around the Square to reflect current and future proposed redevelopment proposals, which include a large public space at roof level to the south, improved urban edge to the N81, smaller urban spaces than indicated in the draft LAP, amended building frontages, possible multi-storey car park to absorb lost surface / roof spaces and a standalone a standalone building to the north east with the existing access road south of Tuansgate retained. ([TTCLAP0031](#), [Alan Crawford , BMA PLANNING , The Owners of The Square Town Centre lands](#))
4. Recognition in the Draft LAP that use of the majority of lands at The Square for car parking represents inefficient and unsustainable use of Town Centre lands and requests welcome reference in the final LAP to identify the principle of multi-storey car parking development within these lands with flexibility as to the final location and shape of such facilities. The following text is requested to be inserted: 'The relocation of the existing surface parking and roof parking spaces

associated with the commercial uses in The Square can be facilitated in a number of new multi-storey car parks which can be integrated with the overall built form and served from existing or new vehicular accesses.' ([TTCLAP0031](#), [Alan Crawford](#) , [BMA PLANNING](#) , [The Owners of The Square Town Centre lands](#))

5. The submission considers that if business / enterprise and housing were promoted in tandem, it would add to the status of the city/town in its own right considering that Tallaght is already the location of Council HQ, TUD and the hospital. The submission states that the LAP should concentrate on creating employment linked to the college, hospital and training centre. ([TTCLAP0048](#), [Belgard Residents Association](#))
6. The submission considers that the proposed Centre will be a sterile environment where communities will be isolated from social interaction. It is considered that high rise is inappropriate and is not the correct approach to build a proper town. A 'left bank' area is suggested to create a vibrant centre populated by cafes, restaurants, markets etc. Millennium Square is referenced as a positive example. ([TTCLAP0034](#), [David Kennedy Kennedy](#))
7. Details are requested on proposals for the large open space beside the proposed Innovation Hub and a design statement for Belgard Civic Plaza is requested. A public park shown in the 2006 Plan to the north of Belgard Square North, near the location known as Mealruain's Field, has not been shown in the Draft LAP. The submission requests that the plans for this site be explicitly stated in the next LAP. ([TTCLAP0033](#), [Zara Stockilk](#) [TTCLAP0049](#), [Tallaght Community Council](#))
8. The Square is vital to the viability and vibrancy of this area. In this regard, the preparation of a new Local Area Plan for Tallaght is welcomed, as are the objectives set out in the Draft Plan that seek to foster growth of retail facilities in the Town. It is important that the Local Area Plan provides a framework for the continued growth of the retail core of the Town, in particular the regeneration and expansion of the Square Shopping Centre. The Shopping Centre is an established retail hub that acts as a focal point of the Town and it is considered that its continued growth will be central to the ongoing improvement of the wider town centre area and urban settlement of Tallaght. ([TTCLAP0017](#), [Kevin Cox](#), [Tesco Ireland Limited](#))
9. It could be beneficial to include an objective as part of the Draft LAP to prepare a new Masterplan with a detailed vision for the central area for the area or alternatively provide greater detail as part of the LAP on the nature and scale of development that is envisaged for the central area in the coming years. By providing a clear but flexible vision for this area, the key objectives of the Local Area Plan which seek to transform this area could be fulfilled. ([TTCLAP0017](#), [Kevin Cox](#), [Tesco Ireland Limited](#))
10. The open space at Westpark next to the junction of Belgard Road and the Tallaght Bypass should be retained, considering the existing hotel is intrusive enough for local residents and that there is no justification for any further intensification of the land use at this site. ([TTCLAP0021](#), [Ellen O Malley Dunlop](#) )

### **Chief Executive's Response**

Matters relating to density and height in the Centre neighbourhood are addressed in Sections 6.6 and 6.7 of this Report.

A number of submissions have requested site specific amendments to the urban structure of the LAP and clarification that the urban structure is 'indicative only'. The urban structure of the LAP is not intended to be rigidly adhered to, as clarified in Section 6.3 of this Report, but does provide a blueprint for development identifying routes, linkages, public spaces, street frontages and building lines ensuring a coordinated approach over a longer period of time. In this regard, it is important that the principles and key elements of the urban structure are implemented in development proposals while allowing for flexibility as to how this can be achieved in a coordinated manner on a site by site basis.

Notwithstanding the flexibility already provided in the block structure, recognising the potential to create a new high quality east-west pedestrian route along the south of the area indicated for the proposed Transport Interchange and the benefit of creating active frontage and overlooking of the Transport Interchange, proposed urban space and pedestrian route at this location, it is considered that the block structure should be amended to reflect the development potential of this area, in tandem with these facilities.

The east-west-north 'Existing/improved water course' and 'Existing/improved landscape' and immediately adjoining tertiary routes is intended broadly as a green amenity and pedestrian route with potential for improved surface water, but appears to be unintentionally excessive in scale. It is considered that the block structure should be amended to clarify the intention here.

In relation to submissions on the Square Shopping Centre, the Council is supportive of the consolidation of the Square as the retail core of the area and of redevelopment opportunities of lands associated with the Square, particularly the extensive areas of surface car parking for mixed uses, including residential, commercial, retail, civic, services, community, cultural, recreational and open space, etc. In this regard, the LAP should clarify that the Council is generally supportive of proposals for underground and multi-storey car parking where it results in more efficient use of lands currently occupied by surface car parking and subject to high quality urban design which implements the objectives of permeability and mixed-uses in the Centre neighbourhood.

The Planning Authority notes concerns with regard to the location and scale of the proposed Transport Interchange as indicated on the diagrams of the Draft LAP and welcomes the engagement of the relevant landowner in delivery of this key piece of infrastructure to date. For clarity, it is not intended that the proposed Transport Interchange and associated Urban Space will occupy the entirety of the indicated area, however the reservation of this area in the Draft LAP for this essential piece of infrastructure is reflective of the primary objective for this location and that development in this area should not impede the delivery of the Transport Interchange. The indicative location of the proposed transport interchange may include residential or commercial development as part of an integrated development, subject to agreement between SDCC, NTA, TII and the landowner for the design and delivery of the proposed Transport Interchange. It is considered that clarification in this regard should be included in the form of text.

Objectives for the area support existing employment in the area and future economic development. Further details and recommendations are contained in Section 6.11 of this Report, however it is considered that further clarification could be provided in Section 3.2 of the LAP.

The Council shares the ambition of consultees to create a vibrant, high-quality urban centre which is attractive for local residents and visitors alike. The LAP is supportive of new uses to animate the Centre neighbourhood and create a vibrant mixed-use urban centre with a legible network of streets and spaces and new focal points, such as the proposed public spaces and transport interchange. Details of proposals for the location known as 'Maelruain's Field' are indicated in the LAP and include proposals for a new urban square, a possible school site and an 'Innovation Centre'. The detailed design of this area and these facilities is of significant importance to the build out of the LAP in the interests of creating a new heart to the extended Town Centre area. Further details and recommendations relating to this are contained in Section 6.3 of this Report.

Key elements of the vision, urban framework and of urban design are outlined which will guide development in the area. As the LAP provides a detailed blueprint for development of the area, it is not envisaged that an objective for a masterplan is necessary or appropriate at this stage. Where a proposal comes forward for development it must demonstrate how the key elements of the proposed urban structure and of high-quality urban design are achieved.

The urban structure should be amended for consistency with the zoning objective for lands under the County Development Plan and, in this regard, new building frontages indicated at Westpark should be amended.

## Chief Executive's Recommendation

- (1) Add text at end of Section 3.2 for clarity to reflect Section 2.3 as follows:

### **Block Structure**

*Flexibility in relation to individual site and block structure will be considered where it is demonstrated that the principles and key elements of the proposed urban structure are achieved. This is particularly relevant to key landmark sites, such as the Square Shopping Centre, where opportunity exists to provide buildings of architectural merit which contribute to the character of the Town Centre core area, public realm improvements and enhance connectivity at a strategic location proximate to the Luas terminus and proposed transport interchange.*

- (2) Amendments to the block plans as appropriate within the final framework plan, including:

Remove indicated building frontages on 'OS – Open Space' zoned lands at Westpark next to the junction of Belgard Road and N81.

Provide for building block adjacent to Transport Interchange.

Provide east-west pedestrian route between the Square and Belgard Square West along southern extent of area currently indicated for Transport Interchange.

Amend block structure immediately north-east of the Square and at southern entrance to the Square.

Remove 'Removed Pedestrian Bridge'.

Include new height band for The Centre of 7-8 storeys (+1 recessed) residential, 6-7 storeys (+1 recessed) non-residential and apply to areas recognised for increased heights in the core of the town centre proximate to the Luas Terminus and The Square Shopping Centre.

Update amenity/pedestrian route line of east-west-north 'Existing/improved water course' and 'Existing/improved landscape' and immediately adjoining tertiary routes.

Amend height of block directly adjacent to SDCC's office to reflect height of building directly to the north of Belgard Square North.

- (3) Amend the 'Land Use Mix' for The Centre in Section 3.2 of the Draft LAP as follows:

*A broad mix of uses in accordance with zoning objective in the County Development Plan ~~Mixed uses including, retail, office-based employment, civic and residential development to complement existing commercial development. New development areas to include supporting non-residential development particularly at ground-floor level.~~*

- (4) Amend/add the following key objective in Section 3.2 of the Draft LAP as follows:

*Support the continued function and future expansion of services of Tallaght Hospital and facilitate improved access to the Hospital*

*Facilitate economic development and provide an enterprise centre, employment generation, and provide an Innovation Centre which supports small business and accommodates growth and future success of local businesses.*

*Encourage new development on existing areas of surface car parking and support in principle the relocation of existing surface parking and roof parking spaces associated with The Square in new multi-storey and/or underground car parks, subject to high quality urban design and integration with the objectives of permeability and mixed-uses in the Centre neighbourhood.*

*Provide enhanced cyclist and pedestrian connectivity across the N81 between the Town Centre and Sean Walsh Park, The Stadium and ultimately the Dublin Mountains, subject to agreement with the TII and the NTA and with regard to Section 28 Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities.*

*Explore the feasibility of uplifting the River Poddle and incorporating into public realm, open space and green/blue infrastructure asset strategies as part of proposals for development.*

- (5) Add paragraph after final paragraph on Page 16 as follows:

*SDCC is committed to facilitating and supporting the delivery of a transport interchange integrating Luas, bus, cycle & taxi together with a quality public open space. Subject to the agreement of SDCC, NTA and TII for the design and delivery of the proposed Transport Interchange and public urban space, the indicative location of the proposed transport interchange may include residential or commercial development as part of an integrated development which adheres to the vision and urban design objectives of the LAP.*

- (6) Add to 'Building Height' provision as follows:

#### **The Centre**

*7-8 storeys (+1 recessed) residential, 6-7 storeys (+1 recessed) non-residential.*

#### **Quality height provisions in The Centre**

*The height standards set out above may be exceeded in the Centre neighbourhood where they reflect the height of existing buildings, particularly in the core of the town centre proximate to the Luas Terminus and The Square Shopping Centre, subject to Section 2.6.*

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#### 6.10.2 SECTION 3.3 COOKSTOWN

1. The submission considers that Cookstown should be developed in a way which promotes the area as a place to work and live. Excellent road linkages and the Luas are highlighted as factors which can contribute to this. The submission goes on to state the importance of providing quality housing with new enterprise. ([TTCLAP0048](#), [Belgard Residents Association](#))
2. Submission with interest in a site in Cookstown Industrial Estate outlines why it is considered that that site is a key development site that has the potential to deliver much sought after homes in Cookstown and South Dublin County. It is requested that the site be designated a 'Key Opportunity Site'. The connectivity of the site is described, including with reference to direct line distances. ([TTCLAP0041](#), [Bartra Capital Property Group](#), [Bartra Capital Property Group](#))
3. The submission raises concern regarding the demise of Cookstown Industrial Estate and indicates the mix of uses with residential over ground floor only does not provide for much employment in this area. ([TTCLAP0045](#), [Máire Ford](#))
4. Submission with interest in a site in Cookstown Industrial Estate off the Belgard Road outlines why the site is considered to be opportunely located within the Cookstown area, proximate to Tallaght Town centre, high quality and frequent public transport services, and key employment centres. It is put that the site that has the potential to deliver much sought after homes in Cookstown and South Dublin County. The submission states that an application for pre-application consultations has been submitted regarding a strategic housing development on this site. ([TTCLAP0043](#), [Square Foot Property Services Limited](#), [Square Foot Property Services Limited](#), [Square Foot Property Services Limited](#))
5. Submission on behalf of landowner in Cookstown requests the revision of the block layout for the subject site at Fourth Avenue by extending the street building lines eastwards by 15 metres. ([TTCLAP0040](#), [Mark O'Reilly \(Prizeview Ltd\)](#), [Mark O'Reilly \(Prizeview Ltd\)](#))

6. Submission on behalf of landowner in Cookstown requests the amendment of the plan to allow the building heights to be locally increased at the junction of Fourth Avenue and the green axis by 2-3 storeys to create a landmark location. ([TTCLAP0040](#), [Mark O'Reilly \(Prizeview Ltd\)](#), [Mark O'Reilly \(Prizeview Ltd\)](#))
7. Submission with interest in a site in Cookstown Industrial Estate outlines the site's locational and planning policy context and why the site is considered, ultimately, to have the potential to deliver much sought after homes in Cookstown and South Dublin County. It is stated that operations at the subject sites remain viable and leases are in place that secure their ongoing occupancy in the short and medium term. There are no immediate residential development potential and the existing users are suitably located given their current requirements, however they do wish to see the long-term development potential of their landholding secured and the wider area developed in a sustainable and high-quality manner. ([TTCLAP0042](#), [John & Deirdre Mulvey](#), [John & Deirdre Mulvey](#))
8. Submission on behalf of a number of landowners with multiple property interests in the Cookstown and Town Centre areas details the current planning context and how the development of Cookstown conforms with same. It notes that Cookstown features a mix of commercial and industrial uses and is currently experiencing high levels of vacancy. The submission highlights that Cookstown offers an opportunity for the provision of large scale residential and employment uses due to its proximity to existing employment sources, public transport, in particular Luas stops and multiple bus routes, and notes that the same potential has been identified in the plan. ([TTCLAP0013](#), [Chris Browne](#), [Hughes Planning and Development Consultants](#), [Steelworks Property Developments Ltd.](#), [Absolute Limousines Ltd.](#), [Boherkill Property Developments Ltd.](#) & [Hollin Court Development Ltd.](#))
9. It is acknowledged that the strategy to achieve more sustainable neighbourhoods around existing LUAS stations makes sense along the northern periphery of Cookstown, however it is submitted that a portion of Cookstown Industrial Estate should be retained as employment/enterprise use only in order to attract large employers to this area which would benefit from the strategic infrastructure and proximity to infrastructure, as well as the development of sustainable neighbourhoods adjacent to it. It is believed that this would constitute a better approach towards achieving the objective of maintaining Tallaght's pivotal role as the capital of the County. ([TTCLAP0019](#), [Gerard Stockil](#), [TCC](#))
10. Submission from owners and occupants of a site in Cookstown Industrial Estate outlines the various activities, employment levels and business investments on this site. Considerable shock and concern is expressed with the objective for an 'Urban Square' indicated for the subject site given the lack of engagement from the Planning Authority in relation to the future urban form of the subject site. ([TTCLAP0027](#), [Ed Barrett](#), [Gravis Planning, Print and Display Limited](#), [Downtree Investments Limited](#), [PD Visual Limited \(T/A P&D Visual\)](#) and [Westside Press Limited](#))

### **Chief Executive's Response**

Issues around land use, existing economic activity, vacancy and mixed-use frontages in the Cookstown neighbourhood area are primarily addressed in Section 6.5 of this Report.

Matters relating to density and height in the Cookstown neighbourhood are primarily addressed in Sections 6.6 and 6.7 of this Report. Updates to the plot ratio ranges for this area are recommended for consistency with the density strategy.

A number of submissions have highlighted specific sites where there are issues relating to heights, densities and urban structure layout. The Planning Authority is satisfied that the consistent approach taken across the LAP lands, and clarifications and minor amendments recommended in this Report, is

appropriate; provides a degree of flexibility and provides a coherent approach to development of a high-density urban centre. It is not proposed to make site specific changes as requested.

There is no 'Key Opportunity Site' designation in the LAP and the Planning Authority is not satisfied that there is a compelling case for the introduction of a 'Key Opportunity Site' designation at this time.

While the Cookstown area is envisaged as transitioning to a more residential area gradually, more efficient use of lands through regeneration presents opportunities for large scale residential and employment uses. While the Draft LAP supports existing businesses, higher intensity employment uses will be encouraged for this area. There is also significant potential for incorporation of existing businesses, which can appropriately fit into mixed-use developments with residential uses, in proposals for redevelopment throughout the area and particularly identified mixed-use frontages.

The Council acknowledges the many existing businesses operating in Cookstown which are essential to economic activity and employment in the area. The Draft LAP outlines the approach to existing businesses or community facilities, including flexibility with regard to LAP standards and there is an opportunity for retention of many existing businesses in the regeneration of this area. Key objectives for the area should be updated to reflect opportunities for economic development in the area.

The Council notes the significant concern expressed by the landowners and occupants in their submission relating to the site of the proposed Urban Square. In the first instance, this urban square is an important piece of infrastructure for the regeneration of the Cookstown neighbourhood which will act as a focal public amenity for future residents of the area. The location, as identified on the diagrams of the Draft LAP, is at a central point in the neighbourhood adjacent to the key routes through the area and equidistant from much of the area as informed by the urban design approach underpinning the proposed urban structure. As referenced in Section 8 of the Draft LAP, the square should be delivered on a site at, or in close proximity to, the junction of Cookstown Road and Second Avenue. In this regard, the identified location is reflective of the objectives for the Plan and the Square may be provided on a nearby site in the surrounding area. It is considered that this should be clarified in the text of Section 2.7.2 of the LAP and in the key objectives for Cookstown.

### Chief Executive's Recommendation

- (1) Amend the vision for Cookstown in Section 3.3 of the Draft LAP as follows:

*An attractive mixed-use ~~residential~~ neighbourhood, which is residential led with more intensive enterprise and employment uses, with distinctive urban qualities and high levels of access to public transport and the urban centre.*

- (2) Merge and amend the 'Land Use/Urban Functions' and 'Land Use Mix' for Cookstown in Section 3.3 of the Draft LAP as follows:

*A residential-led area, with a greater mix of use around Luas stops. A focus on more intensive enterprise, employment and innovation uses associated with existing uses such as the Hospital and TUD-Tallaght. Community, social and other ~~small-walk to services will be acceptable in other locations to provide for a growing residential population.~~*

- (3) Amend/add the following key objective in Section 3.3 of the Draft LAP as follows:

*Emergence of a vibrant mixed use residential-led neighbourhood.*

*Create new urban block structure.*

*Deliver a mix of new open spaces, including provision of a new urban square at a central location at, or in close proximity to, the junction of Cookstown Road and Second Avenue. The exact location, design and delivery of this space to be progressed by SDCC in discussion with landowners in the area.*

*Encourage and facilitate higher intensity employment uses and economic development.*

*Encourage design proposals to provide appropriate space to accommodate non-residential uses, particularly for existing businesses in the Cookstown area which can be appropriately accommodated in a mixed-use development with a substantial residential component.*

*Explore the feasibility of uplifting the River Poddle and incorporating into public realm, open space and green/blue infrastructure asset strategies as part of proposals for development.*

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#### 6.10.3 SECTION 3.4 THE VILLAGE

1. Avoid clashing building styles i.e. ultra-modern buildings beside traditional buildings in the village. It is submitted that there is a need for a design objective to avoid this and improve the design and appearance of streetscapes. It is submitted that Tallaght Village needs granite and stone which is a historical dominant material in the streetscape and this material needs to be actively included in all new buildings. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
2. It is requested St. Mary's Priory lands with the zoning objective of as 'VC - Village Centre' under the County Development Plan be included in the Village neighbourhood. A number of specific changes are requested, particularly to 'Section 3.4 - The Village' of the Draft LAP, to clarify the appropriateness of residential development on these lands. Specific changes requested include application of the height strategy framework in the Village as applied in other areas of the LAP, increase in the indicative number of dwellings in The Village in Table 2.1 of the Draft LAP, show indicative building blocks on developable land in The Priory, provide for building frontage along Old Greenhills Road and Greenhills Road and replace "intimate scale" to "appropriate scale". ([Dominican Order](#), [Dominican Order](#))
3. The submission notes that the village is now a mismatch of conflicting modern and traditional public realm treatments and street furniture. The proposed heritage trail needs to firmly address that and a worthy regeneration project that would be truly transformative for the County town would be to embrace the village area - stop trying to contain it to Main St and leverage its full potential to be a cultural quarter - starting with funding to replace all non-traditional signage, encourage conservation of the TJ Burns houses and replace the mismatched street furniture with village styled items. ([TTCLAP0036](#), [Tara De buitlear](#))
4. There is an over concentration of take-aways in the Town Centre and Tallaght Village which is detracting from creating a thriving County Town. It is submitted that there should be a Strategic Local Objective (SLO) permitting no more takeaways or betting shops in the Main St, Main Road and High Street areas, consistent with An Bord Pleanala decision. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
5. A traditional farmers market in Tallaght Village should be encouraged. It is highlighted that the old sheds in Village Green could provide an ideal setting for this, linking up with the allotment owners and local farmers to create a not for profit community based indoor market. It is suggested that the old shed could be converted into artisan studios, indoor farmer markets, art galleries and craft businesses. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
6. It is requested that the High Street area needs to be seen as part of the emerging Cultural hub in Tallaght with retail uses attracting independent traders and boutiques as there is an over concentration of fast food restaurants in this area. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
7. The medium sized buildings facing onto Main Street opposite Bancroft (in the vicinity of the Lidl store) indicated in the Draft Plan are unnecessary. The existing civic spaces here need to be enhanced and redesigned. The site of the old factory has been largely developed over the past

decade and any future infill should be next to the Tallaght Bypass not the Main Street. ([TTCLAP0021](#), [Ellen O Malley Dunlop](#))

8. It is considered that the undeveloped site at the corner of the old Greenhills Road and Main Street should have a height restriction matching that of the buildings facing it. In addition, a small civic space should be included which matches the Katherine Tynan Memorial Garden. It is considered that any street front buildings proposed between the Costa and Lidl buildings further along Main Road within the village should be no higher than those existing buildings, to match in with the current scale and reduce impact on the houses facing them. ([TTCLAP0037](#), [South Dublin Conservation Society](#), [South Dublin Conservation Society](#))

### **Chief Executive's Response**

It is considered that the Draft LAP and the Council's objectives for Tallaght Village are broadly consistent with many of the submissions received which highlight the need for a high quality design approach of this area, enhancement of the Qualities of the Architectural Conservation Area, with an appropriate mix of uses and future development which respects the existing scale and character of the area.

The Draft LAP sets out the objectives for development in this area to be appropriate to the existing scale and context, particularly the ACA.

For clarity, the land use mix should refer to the zoning objective under the County Development Plan. The zoning objective, as well as the designation of Architectural Conservation Area and Protected Structures, for the area under the County Development Plan will primarily guide the appropriateness of uses in this area.

The Council notes the submission which seeks to include The Priory in the Village neighbourhood and considers this to be acceptable. While it is considered that clarification should be provided that some residential development may be acceptable on lands to the east of the Priory, given the historic context, protected status and environmental value of these lands, it is not proposed to amend the block structure. Any residential development should, in the first instance, respect the context and setting of the Priory and the Village character and it is not proposed to amend the urban structure or building height guidance of the LAP for this area.

It is considered that the height, design and objectives for the Village clearly emphasise the need for any proposed development to respect the existing scale and context. In this regard, no major changes are proposed to the height strategy and urban structure of the LAP. Notwithstanding this, the indicative block at the junction of Old Greenhills Road and Main Street should be amended in the interests of consistency with the objective for a public space at this location.

### **Chief Executive's Recommendation**

- (1) Amend the boundary of the Village neighbourhood to include the Priory lands zoned for 'VC – Village Centre'
- (2) Modify Section 3.4 to acknowledge inclusion of the Priory and associated uses.
- (3) Merge and amend the 'Land Use/Urban Functions' and 'Land Use Mix' for Cookstown in Section 3.3 of the Draft LAP as follows:

*Mix of uses in accordance with the County Development Plan zoning objective for 'VC - Village Centre', including residential, appropriate retail, walk to services, cultural, civic, recreational, community and other uses which support the evening economy.*

(4) Amend the indicated building frontage for the vacant site in the Village Centre (bound by Greenhills Road to the east, Main Street to the South and Old Greenhills Road to the west) by replacing the south western corner of this frontage with an 'Urban Space'.

(5) Amend/add the following key objective in Section 3.4 of the Draft LAP as follows:

*Develop the tourism potential of the historic village in accordance with a Tourism Strategy for the area, including a heritage trail and potential community and cultural attractions.*

*Protect the character and integrity of the Priory, including its parkland setting, and provide for greater public access and usage.*

*Protect and preserve Heronry located on Priory lands and extending into TUD lands.*

*Provide for some residential or mixed-use development on lands to the east of the Priory, subject to the above key objectives.*

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#### 6.10.4 SECTION 3.5 BROOMHILL

1. Submission with interest in a site at Broomhill Road in Broomhill Industrial Estate outlines the site's locational and planning policy context and states that the ultimate ambition is to progress the development of a high-quality apartment scheme at the subject site. It is submitted that the location of a pocket park within and adjacent to the site confirms that it is appropriate to accommodate an increase on the heights shown in the Draft LAP. ([TTCLAP0044](#), [Austin McHale](#), [Austin McHale](#))
2. Clear guidance and enterprise ambition are needed to retain and actively grow employment in Broomhill and the location of TUD/TC should be leveraged to attract a suitable range of employers into the immediate area to create an education/industry/employment cluster. The LAP should specifically favour enterprise and employment creation through zoning, specific objectives or permitted land uses at this location. ([TTCLAP0049](#), [Tallaght Community Council](#))
3. Submission requests that the area south of Kilnamanagh presently covered by the Broomhill industrial area needs a residential vision that compliments the existing community. Any new residential development on Mayberry Road opposite the mature estates in Kilnamanagh should be in keeping with existing homes. There is space along Airton Road for more intensive development but this should not be next to the existing estates of Redwood, Parkhill and Birchview. ([TTCLAP0021](#), [Ellen O Malley Dunlop](#))
4. Submission with interest in a large vacant industrial premises at the junction of Airton Road and Greenhills Road outlines the planning background, locational context and planning policy context of the subject site. Having regard to the criteria outlined in national policy for promoting increased density and height, it is stated that this large brownfield site is well served by public transport with high capacity, frequent services (the 27 Dublin Bus has a frequency of one every five minutes during peak times) and good links to other modes of public transport. The bus route along Greenhills Road is also due to be further improved with the delivery of BusConnects, including CPOing of part of the subject site. Based on analyses of potential development sites in Broomhill, it is concluded that the proposed plot ratio will not achieve the residential quantum prescribed for the Broomhill Neighbourhood and a higher plot ratio is needed for the subject site. ([TTCLAP0026](#), [Trevor Sadler](#), [MCG Planning](#), [Greenleaf Group](#))

#### Chief Executive's Response

Issues around land use, existing economic activity, vacancy and mixed-use frontages in this area are primarily addressed in Section 6.5 of this Report.

Matters relating to density and height in this area are primarily addressed in Sections 6.6 and 6.7 of this Report. Updates to the plot ratio ranges for this area are recommended for consistency with the density strategy.

The clarification regarding land use in Broomhill should be reflected in clearer guidance in the proposed urban structure and key objectives and a number of recommendations are suggested.

### Chief Executive's Recommendation

- (1) Amend the vision for Broomhill in Section 3.5 of the Draft LAP as follows:

*An attractive consolidated, diversified and intensified place for business and employment that is better connected to surrounding places. Emerging residential uses along ~~primary frontages~~ the southern side of Airton Road*

- (2) Merge and amend the 'Land Use/Urban Functions' and 'Land Use Mix' for Broomhill in Section 3.5 of the Draft LAP as follows:

*Predominantly business, enterprise and employment area with more mixed-use residential development fronting along ~~Greenhills Road and~~ the southern side of Airton Road, subject to integrating effectively with existing surrounding uses.*

- (3) Include the following 'Building Heights' in Section 3.5 of the Draft LAP:

*Retain the existing building line set back along Airton Road, particularly along the southern side of Airton Road for the provision of a linear park.*

- (4) Amend open space requirements in Broomhill as follows:

*Local green corridors*

*~~Local Pocket Park along Airton Road or~~ Linear Park along Airton Road and along southern boundary with TUD/TC with new building frontage overlooking.*

- (5) Amend/add the following key objective in Section 3.5 of the Draft LAP as follows:

*Maintain buffer along stream on southern edge of Broomhill neighbourhood.*

*Maintain existing building line set back along Airton Road and seek delivery of a linear park along southern side of Airton Road in tandem with development.*

- (6) Amend urban structure plan for Broomhill to omit indicative open space to north of Airton Road and set back building line south of Airton Road to reflect requirement for linear park.

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#### 6.10.5 SECTION 3.6 GREENHILLS

1. Submission with interest in a site on Greenhills Road and opposite Airton Road outlines why it is considered that the site has the potential to accommodate a high quality, high density residential development. The submission considers the objectives of the Draft LAP as they relate to Greenhills 'Regen' zoned land will require amendment to facilitate the density of development required to meet the ambitious growth targets outlined for Tallaght and to be consistent with national and regional planning policy pertaining to higher densities and compact growth. ([TTCLAP0014](#), [Thomas Hennessy, McCutcheon Halley, John Doyle and Paraic Mooney](#))

### Chief Executive's Response

Matters relating to density and height in this area are primarily addressed in Sections 6.6 and 6.7 of this Report. Updates to the plot ratio ranges for this area are recommended for consistency with the density strategy.

This area is primarily an area for industry, enterprise and employment and the LAP does not change this, although it does support more intensive and higher value uses. Limited residential development may be considered fronting onto Greenhills Road, where it can be demonstrated that the residential element can be effectively integrated into the surrounding uses. Clarification in this regard is recommended.

### Chief Executive's Recommendation

- (1) Merge and amend the 'Land Use/Urban Functions' and 'Land Use Mix' for Greenhills in Section 3.6 of the Draft LAP as follows:

*Predominantly business, enterprise and employment area with higher value commercial, industry and distribution and potential for limited mixed uses along Greenhills Road, proximate to Airton Road, where it can integrate effectively with existing and established uses*

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#### 6.10.6 SECTION 3.7 TECHNOLOGICAL UNIVERSITY DUBLIN / TALLAGHT CAMPUS

1. The submission notes the TU Dublin Campus is a major asset not only to Tallaght but to the county. The submission strongly supports the further development of the campus to provide additional educational opportunities for local students and through its growth to engage with businesses in the area to create more employment. ([TTCLAP0025](#), [Peter Byrne, South Dublin Chamber](#))
2. The submission is made by the Deputy President of TU Dublin Students Union Tallaght Campus. Concern is raised as to the marketing of the LAP. The submission highlights the need for additional services such as guards and increasing mental health services. The submission requests to work alongside the council in developing this plan to ensure the university, as identified as a key facility in the plan, is student friendly. ([Deputy President, Technological University Dublin, Technological University Dublin Students Union Tallaght Campus](#))
3. Submission relating to St Mary's Priory lands bound by Tallaght Village to the south and Old Greenhills Road to the east, broadly outlines the site's locational and planning policy context and further that part of these lands is currently for sale with indicative intentions for residential development. It is stated that the fund from this sale would help to maintain the Priory. Concerned that the Priory has been included within the TUD/TC neighbourhood, despite being distinct and separate, and that it has been indicated on Figure 2.4 as institutional land use along with TUD/TC. It is requested that the LAP be amended to distinguish the Priory from TUD/TC and differentiate the indicated land use on Figure 2.4. ([Dominican Order, Dominican Order](#))

### Chief Executive's Response

SDCC recognises that TUD Tallaght is a major asset to the County and supports its continued development.

The direct provision of additional services, such as Gardaí and mental health services is not a matter for the detail of the LAP, however the LAP does recognise the need for additional services in the implementation and sequencing chapter and SDCC will support statutory bodies in the provision of these services.

As addressed in Section 6.10.4 of this Report, it is accepted that the Priory lands will be included in the Village neighbourhood and changes are recommended in this regard.

### Chief Executive's Recommendation

- (1) Amend the boundaries of the TUD-TC and Village neighbourhood to include the Priory lands zoned for 'VC – Village Centre' in the Village.
- (2) Modify Section 3.4 and 3.7 to acknowledge inclusion of the Priory and associated uses.
- (3) Amend/add the following key objective in Section 3.7 of the Draft LAP as follows:

~~*Protect the character and integrity of The Priory.*~~

*Protect the parkland setting and provide for greater public access and usage.*

*Protect and preserve Heronry located on Priory lands and extending into TUD lands.*

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#### 6.10.7 SECTION 3.8 WHITESTOWN

1. The submission notes that Whitestown is one of the gateway entry points to Tallaght Town Centre. The submission highlights that the palisade fencing on the N81 from Whitestown was designed for an old industrial estate not a gateway entry point to Tallaght central. It is contended that it is visually poor and neither showcases the business park nor functions as a gateway. The submission requests support to replace this fencing with a secure but more appropriate fencing that reflects an entry point to Tallaght central. It is put forward that all entry points should be clearly delineated as is the case at the other end of the N81 (Spawell) which the entry to Tallaght is very good. ([TTCLAP0025](#), [Peter Byrne, South Dublin Chamber](#))
2. It is requested that SDCC work with Whitestown Industrial Estate to upgrade the N81 frontage to move back the palisade fencing to the internal car park side, opening up the area to be more inviting and visual along the N81, promote the enterprise already here. ([TTCLAP0049](#), [Tallaght Community Council](#))
3. It is contended that the proposed zoning of the section of the Whitestown Hub fronting the N81 should be amended, (currently zoned objective EE), this should be amended to objective REGEN in order to blend the existing neighbourhood in Killinarden with the new Town Centre ([TTCLAP0032](#), [Marie Corr](#))

### Chief Executive's Response

Submissions regarding the improvement of the interface with the N81 are noted. The LAP includes a key objective for this area to improve interface with main routes.

As clarified elsewhere in this Report it is not within the remit of the Lap to amend land use zoning objectives.

Issues relating to the Whitestown stream, its use as a route and ecological value are addressed elsewhere in this Report and amendments are recommended.

### Chief Executive's Recommendation

- (1) Merge and amend the 'Land Use/Urban Functions' and 'Land Use Mix' for Whitestown in Section 3.8 of the Draft LAP as follows:

*Commercial services and employment hub in close proximity to The Centre.*

- (2) Add following requirement:

*Prior to any works being carried out to open up the Whitestown Stream as a cycling / pedestrian corridor, an Ecological Impact Assessment of proposals should be undertaken, which should include detailed ecological surveys of the Whitestown section of the Whitestown Stream.*

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#### 6.10.8 SECTION 3.9 THE TOWN PARK

1. The submission discusses proposals for Sean Walsh Park, development proposals, tourism strategy, potential for the park, existing uses and raises a number of specific issues regarding Sean Walsh Park, particularly the western end of the Park, including the following:
  - Proposals to develop astro pitches are considered to conflict with a natural trailhead at the start of the Dublin Mountains Way (DMW);
  - The west end of the park and the identified location on the draft plan is well used by walkers, dog walkers and families for passive recreation. It has the potential for increased tourism (if marketed appropriately) from the DMW;
  - The park does not need to be "regenerated";
  - High quality park maintenance is required;
  - It is noted that there is no mention of a formal trailhead and signage for the DMW which start in the park;
  - Focus on biodiversity and passive recreation is required in this section of the park, noting the wetlands (currently damaged);
  - Sports are well catered for in the stadium and the existing pitch is rarely used, not considered to be a safe, reliable pitch by the club;
  - Water table is high at this location;
  - Proposes area to the east of the stadium as more suitable for astro pitches with potential to utilise stadium facilities;
  - There should be more hedging along all boundary facing into Sean Walsh Park up to Marlfield to improve this green corridor and more native tree planting of specimen trees
  - The park entrances need more lighting for safety and security
  - The park needs Brien amenity and tourism signage on the N81;
  - The green flag and park need to be embraced and endorsed proudly through visible signage; ([TTCLAP0036](#), [Tara De buitlear](#))

#### **Chief Executive's Response**

The creation of connector routes such as the DMW and associated hard and soft landscaping together with signage are detail matters of the County Tourism Strategy. However, it a core objective of the LAP through the Movement and Urban Framework to maintain and facilitate links within and links between the Town Centre and adjoining areas including Sean Walsh Park and onward to the Dublin Mountains. Any future proposal to create a direct route to the Dublin Mountains from Tallaght is a matter for the County Tourism Strategy. Section 4.3 of the LAP outlines the strategic approach to tourism and active recreational development.

A number of operational/maintenance issues are raised in relation to the Town Park, many of which are outside the remit of the LAP. Notwithstanding this, the key objective for this area do set out the broad objectives for Sean Walsh Park.

Further changes are recommended elsewhere in this Report in relation to biodiversity and flood risk. Suggestions regarding the location of astro turf pitches are noted and the specific location of these facilities will be addressed in detailed design when they are progressed.

### Chief Executive's Recommendation

No further changes recommended.

## 6.11 CHAPTER 4: ECONOMIC DEVELOPMENT AND TOURISM

1. It is requested that SDCC implement a formal connector route from the Luas to the Dublin Mountains Way and Sean Walsh Park with strong soft and hard landscaping to create the walkway and very prominent tourist signage. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
2. The submission notes that the continued development of Tallaght Stadium is an important piece of Tourism / Sport Infrastructure offering opportunities for different events to be held which brings people to the area. In addition, it is noted that the National Basketball Arena is another key piece of Tourism / Sport infrastructure that with greater support can ensure Tallaght can offer a greater variety of venues for more varied activities and events. It is considered that improved phone/WIFI network connectivity in Tallaght Stadium would improve overall customer experience and satisfaction and expand the current business opportunities for Tallaght Stadium. ([TTCLAP0025](#), [Peter Byrne](#), [South Dublin Chamber](#))
3. The submission notes that the further development of the Square Town centre is important in ensuring the changing dynamic of retail / leisure is captured and available to Tallaght residents and workers. The submission considered that new engaging environments has brought retailing back to life in comparison to online. The leisure element of shopping is noted and it considers that the ongoing development of restaurants and leisure activities in the Town centre is very important. ([TTCLAP0025](#), [Peter Byrne](#), [South Dublin Chamber](#))
4. A more proactive approach to economic regeneration should be taken with a view to regenerating employment levels in this area in tandem with the development of high-density mixed-use neighbourhoods. It is submitted that SDCC should work in tandem with the Industrial Development Agency (IDA) to identify a vision and a design brief for large scale office and employment spaces in a regenerated neighbourhood like Cookstown. ([TTCLAP0019](#), [Gerard Stockil](#), [TCC](#))
5. Strongly suggests the innovative HeatNet project development by SDCC and AWS be used to create a 'green' industrial site based near the University Hospital, Tallaght Training Centre and the University, believing that the project will attract many environmentally conscious business to the Tallaght Town Centre area and that this is the best use of resources. ([TTCLAP0033](#), [Zara Stockilk](#))
6. It is requested that micro enterprises are encouraged in Tallaght Village and that the retail/land uses are broadened. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
7. It is requested that Cookstown is designated as a high-tech hub of the new university, co-existing with the hospital, as Cookstown is not suitable for apartments and a high value tech park is of more benefit and should be rezoned. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
8. There is ample commercial space and a lot of vacancy in the area. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))

9. It is requested that SDCC encourage and formally cite film studios as an acceptable land use in the town centre area and that the Council encourage the regeneration of old warehouse sites in Cookstown and Belgard Road for such purposes. It is submitted that such use would align with the creative media in IT Tallaght, the growth in film industry activity in Ireland and the designation of Tallaght as an Arts hub. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
10. Tallaght already has 3 or 4 large data centres, occupying large sites and providing a very small number of medium-term jobs and it is requested that there shall be no more data centres in Tallaght. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
11. It is requested that a Tallaght Education City and Innovation City objective be included in the LAP, to update the wording and include an SLO to develop the Tallaght region to its full potential and to position itself positively in line with the Tallaght Campus of the new university. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
12. It is important that the LAP continues to provide a flexible framework for development at the Centre and supportive policy objectives as part of the Draft LAP will ensure proposals can continue to be brought forward for the expansion of retail facilities and other town centre uses at the Square Shopping Centre. ([TTCLAP0017](#), [Kevin Cox](#), [Tesco Ireland Limited](#))
13. It is important that the requirements of modern retailers are recognised and accommodated through the inclusion of appropriate policies in any new masterplan or statutory planning policy. Many retailers will operate an established business model, capable of delivering goods to customers at accessible locations in a competitive fashion. Such models have some flexibility with regard to the overall scale of the store (which will be dependent on market demand) and the physical layout of the building. Other matters such as car parking, accessibility and the identification of the retailer's profile are important to the establishment of a store in a community and it is important that statutory plans provide policies to accommodate these requirements. ([TTCLAP0017](#), [Kevin Cox](#), [Tesco Ireland Limited](#))

### **Chief Executive's Response**

Submissions requesting creation of a formal connector route between Tallaght Town Centre and Dublin mountains are noted. The creation of such a connector route and associated hard and soft landscaping together with signage are detail matters of the County Tourism Strategy. However, it is a core objective of the LAP through the Movement and Urban Framework to maintain and facilitate links within and links between the Town Centre and adjoining areas, including Sean Walsh Park and onward to the Dublin Mountains. Any future proposal to create a direct route to the Dublin Mountains from Tallaght is a matter for the County Tourism Strategy and County Development Plan. See quote from Section 4.3 of the Plan below.

SDCC also fully appreciates and recognises the importance of the retail function in Tallaght and will continue to support appropriate retail and associated leisure development within the Town Centre. It is acknowledged that Tallaght has a range of excellent sporting and recreational venues which SDCC continues to support'.

Section 4.3 of the plan states 'Tallaght is identified as an Activity and Sports Cluster in the South Dublin Tourism Strategy 2015 and ...the integration and collective marketing of the arts cluster will help make Tallaght a destination in its own right, a hub for sports and activity tourism and a gateway to the Dublin Mountains.'

The policy and strategies employed to facilitate economic and employment development within Regeneration areas is not a matter for the detail of the LAP, as Regeneration areas are not restricted to Tallaght Town Centre but also exist in other areas of the county. It is a matter more suited to the strategic policies on economic development which will emerge through the review of the County Development Plan. A number of policies and objectives addressing SDCC's commitment to supporting

and facilitating enterprise and economic activity in the town centre are set out in Section 4.2 of the Plan.

Recommendations that the plan support micro industries, film studios, high tech hubs and a green industry site are noted. All of the uses and activities outlined above are provided for within Regeneration and Town Centre zoning matrices. The uses in the matrices are set out in the County Development Plan and cannot be altered by the LAP. It is important to note that over time the needs of any individual area will change for this reason, for example it is better to refer to 'Cultural Uses' rather than a specific use such as 'Film Studio' which might be overly specific in some circumstances. It is noted that an 'Innovation Hub' to support start-up businesses is proposed within the Centre neighbourhood. Section 4.2 contains a series of policies which support a wide range of businesses across the LAP lands.

The importance of Tallaght as a centre of Education and innovation through TUD Tallaght and medical training college at Tallaght Hospital is cited throughout the plan.

The preliminary findings of an employment survey for the area have revealed that employment levels in office and retail uses across the various neighbourhoods in terms of workers per sqm floorspace are generally in accordance with the recommended guidance for the office services, however the densities for retail services is higher (as per UK guidance HCA Employment Density Guidance 3rd Edition (2015)). The worker density for Industrial uses across the LAP lands are generally significantly lower than recommended guidance, reflecting a high rate of floorspace with comparatively low numbers of workers, which is not considered to be an efficient use of building space in this highly populated, well-connected urban location with significant civic, educational and economic strengths. The regeneration of lands to more intensive uses is necessary to expand the population and employment base and is considered to be an appropriate strategy to further the status of Tallaght as the County Town and a regionally important centre of economic activity, innovation and public services.

As a point of clarification, the additional elements needed to strengthen the Tallaght cluster and achieve it's standing as a principal gateway, as identified in the South Dublin Tourism Strategy include a Heritage Trail Landing Point and a Visitor Centre.

### **Chief Executive's Recommendation**

It is recommended that the following amendments be made.

- (1) Add text to Section 4.1 Introduction

*The significant assets of the historic village of Tallaght coupled with its location at the foot of the Dublin Mountains has contributed to Tallaght's emergence in recent years as a tourism centre and growing hospitality services centre. Tallaght's growing function as a centre for sustainable energy innovation through its designation by SEI as a Sustainable Energy Community contributes to future tourism potential in the area.*

- (2) Add text to Section 4.2

*Tallaght is a regionally important centre of economic activity, innovation, public services, sport and tourism. There is a substantial and varied employment base in the area. Preliminary findings of an employment survey for the area have revealed that worker density (workers per sqm floorspace) employment levels in office and retail uses across the various neighbourhoods in terms of workers per sqm floorspace are generally in accordance with the recommended guidance for the office services and the densities for retail services is higher (as per UK guidance HCA Employment Density Guidance 3rd Edition (2015)). Industrial uses across the LAP lands are generally significantly lower than recommended guidance, reflecting a high rate of floorspace with comparatively low numbers of workers. This is not considered to be an efficient use of building space in this highly populated, well-connected urban location with*

*substantial civic, educational and economic strengths. There is significant potential through the gradual regeneration of existing brownfield lands to further the status of Tallaght as the County Town and a regionally important centre of economic activity, innovation and public services.*

- (3) Add policy objective to Section 4.2.

*It is the policy of the Council to continue to support Tallaght's role as a centre of Education and Innovation and to continue to support and promote the activities of Tallaght Hospital, TUD, the Training Centre, existing businesses and enterprises, and related use, as leaders in Education and Innovation.*

- (4) Add policy objective to Section 4.2

*It is the policy of the Council to support the provision of advanced Wifi service within the LAP lands.*

- (5) Amend and add text to Section 4.3

*In addition to the outdoor activities and sports elements, the additional elements needed to strengthen the Tallaght cluster and achieve it's standing as a principal gateway, as identified in the South Dublin Tourism Strategy are*

*Heritage Trail [Landing Point](#)*

*[Visitor Centre](#)*

## 6.12 CHAPTER 5: COMMUNITY FACILITIES

1. Requests that the BMX facility proposed for Jobstown be completed, highlighting the potential to provide an excellent facility for the youth of the area and for hosting international competitions. ([barry dunne](#))
2. The submission highlights that there are no plans for an increase in community services such as Guards given the increase in population. It is considered that there will need to be an increase in Gardai and updated systems to manage such an increase over a such an area. ([TTCLAP0045](#), [Máire Ford](#))
3. The submission makes references to Key Objectives in the draft plan with respect to expansion of community facilities in tandem with population growth and provisions of schools. It is questioned if this will be done in consultation with the local community. ([TTCLAP0045](#), [Máire Ford](#))
4. The plan proposes significant increase in residential development within the lifetime of the plan (2020- 2026) and also in the longer 20-year timeframe. The significant extent of proposed development creates requirements for school provision both in the medium term and in the long-term ([TTCLAP0018](#), [Alan Hanlon](#), [Department of Education & Skills](#) )
5. The Department understands from discussion with the Council that 3,500 - 5,000 units could give rise to a population increase of between cc 10,000 and 14,000 + people. Based on the Department's assessment criteria, a population increase of this magnitude would yield a requirement for at least one post-primary school. In regard to primary school provision, this level of population increase generated by the LAP will likely translate into a requirement for a minimum of two (and possibly three) 24-classroom primary schools (600 pupils per school).

The DES outline that proximity to the local relevant population is seen as a key priority for the location of any required school, in particular, at primary school. The Department welcomes the reference to the provision of a primary school site in Cookstown in this LAP. The primary school

site identified in Killinarden (at the edge of the LAP area) is not ideally placed to serve a need of increased population in the Tallaght town centre or Cookstown neighbourhoods because the N81 bisects it from the increased population. ([TTCLAP0018](#), [Alan Hanlon, Department of Education & Skills](#))

6. Taking into account the long term objectives of the Plan and the expectation for significant population growth beyond 2026, the Department believes that it would be prudent that this current plan reserves three suitable and appropriately located primary school sites along with a reservation for a suitable and an appropriate post-primary school site. ([TTCLAP0018](#), [Alan Hanlon, Department of Education & Skills](#))
7. The Department welcomes the statement within the Plan that 'Demographic changes within the Tallaght Area will continue to be monitored by SDCC and the Department of Education and Skills on an ongoing basis and it is possible that further or altered educational requirements will arise over the lifetime of this Plan and subsequent plans.' ([TTCLAP0018](#), [Alan Hanlon, Department of Education & Skills](#))
8. The DES outlines that the intensity of development (reference Objective UF1) is likely to result in smaller school facilities and sites with regard to the potential reduction of site area required for onsite parking and/or transport circulation. The DES outline that this cannot be explicitly established from the development standards published here in the draft LAP. ([TTCLAP0018](#), [Alan Hanlon, Department of Education & Skills](#))
9. The DES note that the provision of school sites in urban areas is continually pressured downwards in terms of site size. This often challenges the provision of school play facilities at the school location. The Department requests that SDCC consider the location of candidate school sites adjacent to existing or new playgrounds and recreational facilities with the intention of shared use to avoid unnecessary duplication of facilities by the Exchequer. ([TTCLAP0018](#), [Alan Hanlon, Department of Education & Skills](#))
10. It is noted that the LAP intends to apply development contributions and/or supplementary development contributions to developments. The DES seeks an exemption from these contributions, and should even be a net beneficiary of the schemes towards the provision of shared-use of playgrounds and other recreational facilities ([TTCLAP0018](#), [Alan Hanlon, Department of Education & Skills](#))
11. Time to move on from congregated settings - A strategy for community inclusion: The submission recommends that the draft LAP should improve community inclusion of people with disabilities; improve greater connectivity between generic community based services and disability specific organisations; and focus on meeting the housing and accommodation needs of people with disabilities through a combination of purchased housing, new-build housing, leased housing or rented housing. A local re-housing plan should be prepared and jointly co-ordinated with the HSE, in collaboration with service providers. ([TTCLAP0009](#), [Andrew Byrne, Health Service Executive](#))
12. It is requested that Council land should be used to create 50 allotments in the Town Centre for town centre dwellers only, to compensate current apartment dwellers who have a lack of private garden space and to increase healthy eating and sustainability. Such an initiative would create therapeutic and community building benefits which are well respected as the usage of allotments in Friarstown and Tymon shows. The allotments should be within walking distance for the apartment dwellers. ([TTCLAP0008](#), [Gerard Stockil, TCC, Tallaght Community Council](#))
13. The current scale and location of the recycling units in the car park is excessive and ill placed beside the Dublin Mountains Way and Maldron Hotel which both have tourism potential. ([TTCLAP0008](#), [Gerard Stockil, TCC, Tallaght Community Council](#))
14. It is requested that the use of the Cookstown Reservoir as an amenity i.e. an ice rink or adventure centre should be investigated. ([TTCLAP0008](#), [Gerard Stockil, TCC, Tallaght Community Council](#))

15. The submission welcomes proposals for 2 no. community centres within the overall plan area. It is considered that such facilities should be located in a north or east side block facing onto one of the urban spaces or pocket parks with pedestrianised frontage facilitating outdoors events during good weather periods.

The provision of playing pitches and all-weather playing facilities should be carefully considered in the context of Flood Risk and management. ([TTCLAP0037](#), [South Dublin Conservation Society](#), [South Dublin Conservation Society](#))

16. HSE suggests that community gardens are facilitated through identifying and releasing suitable publicly owned land. Suitable facilities that cater for all age ranges should be provided, including alcohol-free venues for young people. ([TTCLAP0009](#), [Andrew Byrne, Health Service Executive](#))

### **Chief Executive's Response**

As part of the plan-making process a Social Infrastructure Audit (SIA) was carried out to inform the LAP and examined the availability and capacity of existing social infrastructure facilities in Tallaght, determined future requirements and to makes recommendations based on anticipated population growth. 'Social Infrastructure' relates to the provision of services and facilities which are essential for health, wellbeing and social development of a town/place and includes for example, schools, health services, surgeries and community specific services, as well as areas which can offer active sports and passive recreational facilities.

The audit was structured and carried out in the following manner:

1. Assessing the Existing Situation.
  - A social and demographic profile of the community who live in Tallaght.
  - The identification of existing community infrastructure features (including where relevant, their capacity) under a number of predefined themes including Education/Training, 'Childcare', 'Health', 'Sports & Recreation', Social/Community Services', Arts & Culture', 'Faith', and other features.
2. Future Demand Analysis
  - Considered the existing infrastructure provision relative to the existing/planned population and best practice provision.
3. Social Infrastructure Recommendations
  - Recommendations for future social infrastructure provision have been taken into consideration in the preparation of the LAP.

Appendix 3 provides a breakdown of the requirements under relevant themes which provide for the future needs of the projected population.

In addition, the community department through its community officers will be consulted on an ongoing basis regarding ongoing service requirements in the plan area.

The comments and recommendations of the Department of Education are noted, it is considered appropriate that the wording of plan to be amended to provide reservations for 3 primary schools and one secondary school. 1 primary school each to be provided in the Cookstown and Village / Broomhill Neighbourhoods in addition to the 1 potential site at the southern edge of the LAP adjoining Whitestown. Detailed site issues, design, layout etc are appropriate to the development phase of delivery. The purpose of the LAP is to reserve land within the LAP to facilitate the delivery process. SDCC has a strong history of engagement with the Memorandum of Understanding which enables the SDCC to engage in detail with the Department of Education and Science on the delivery of schools. The range of issues referred to by the Department of Education and Science are matters which will be

addressed through the MOU. It is for this reason that the exact location of the primary school sites is not detailed in the LAP. The LAP provides for their delivery in conjunction with ongoing development.

Issues relating to sharing of facilities where sites have constraints are acknowledged. It is considered good urban design practice to facilitate and encourage such arrangements. These issues will be addressed as part of the Schools MOU.

For safety and security reasons Irish Water advises that the Cookstown Reservoir area will not be appropriate for active recreational uses. It's use for amenity/recreational purposes is subject to further discussion with Irish Water.

The location of recycling facilities and completion of the BMX facility in Jobstown are not matters relevant to the detail of the Local Area Plan.

The South Dublin County Council Development Contributions Scheme provides that development contributions do not apply to Department of Education funded primary and secondary school developments except in circumstances where as a result of the development, exceptional costs not covered by the South Dublin County Council Development Contribution Scheme 2016 - 2020 are incurred by the Council, resulting in the necessary provision of a specific public infrastructure or facility. The particular works may be specified in the planning conditions when special development contributions are levied.

It is a feature of the 'place making' urban design model that the design and layout of new urban areas are such that the health and wellbeing of those living and working in the area is integral to the approach.

Part M of the building regulations addresses the issue of ensuring that adequate provision is made for all people (not just those with disabilities) to access and use buildings, their facilities and the environs. Housing for the disabled is addressed under Part 5 of the Planning and Development Act 2000 as amended.

Provision of community gardens and allotments are matters which are commonly delivered in conjunction with the Public Realm Section of the Council. In any event they would be provided within the boundaries of parks and public spaces provided for in the LAP. It is considered that adequate provision has been made for such uses to be developed within these park/spaces by the relevant Section of Council.

### **Chief Executive's Recommendation**

- (1) Amend text to provide for the reservation of 3no. primary schools within, or immediately adjoining the LAP lands. Further clarification and priority to be provided upon review of County Development Plan following ongoing assessment of residential development in the area.

## **6.13 CHAPTER 5: RESIDENTIAL DEVELOPMENT**

1. Apartment dwelling is an integral part of life in Tallaght. It is noted that there are positive stories about apartment living and proximity to services however there is a need to identify what works well and build on it and what may not be working so well and fix it. It is submitted that Tallaght has many apartment developments and in particular concern is raised that there are too many 1 bed and small apartments. The percentage of apartments currently unoccupied in Tallaght is requested. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))

2. It is requested that overhanging balconies are banned in new developments in Tallaght Town Centre. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
3. Allowing for the development of between 9,716 and 12,789 total apartments- a scaling up of four to five times the existing Tallaght Town Centre- on the current tenure model, is clearly not in any way supportive to the development of a new stable community in the middle of Tallaght ([TTCLAP0039](#), [Kieran Mahon](#))
4. Submission outlines that an approach with the Technological University and the Hospital and their relevant Unions regarding the housing needs of workers and students, and future strategic development could add significantly to the LAP. ([TTCLAP0039](#), [Kieran Mahon](#))
5. It is recommended that a strategic aim in the draft Plan should be to promote lifetime adaptable housing and design and the use of assistive technologies as per The National Positive Ageing Strategy. All residential development should incorporate the 'Universal Design' Principal as per The Universal Design Guidelines For Homes In Ireland. The 12 criteria outlined in The Urban Design Manual - A Best Practice Guide should be incorporated into the LAP. ([TTCLAP0009](#), [Andrew Byrne](#), [Health Service Executive](#))
6. A detailed services and amenities study should be carried out for each new neighbourhood 'block' within the new neighbourhoods. This could then be combined with Census data and projected populations from the Core Strategy to dictate the location of family centred development in order to give it the best chance of establishing itself as the nature of family housing in the town transitions. ([TTCLAP0019](#), [Gerard Stockil](#), [TCC](#))
7. Concern that the management companies in apartment developments are not always working as well as they could be. It is requested that the Council publish a review of efficacy of management companies in Tallaght apartments. It is also requested that details of management companies are registered on the SDCC website and kept up to date and that the Council introduce a by-law to fine management companies who do not provide this information. In addition, it is requested that the Council keep a list of fees charged by management companies and publish a report so that trends can be monitored annually. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
8. It is considered that the Council must seek to incorporate a very strong, specific and enforceable policy around any Strategic Housing Development Planning applications within the Town centre lands. ([TTCLAP0032](#), [Marie Corr](#))
9. It is considered that the LAP should develop design and development standards for apartment developments which address issues of overshadowing, light and usable balconies. ([TTCLAP0037](#), [South Dublin Conservation Society](#), [South Dublin Conservation Society](#))
10. It is contended that the proposed elderly housing scheme adjoining Sean Walsh Park is not a suitable location for such a facility given its proximity to the stadium and proposed future uses for concerts and outdoor events. ([TTCLAP0037](#), [South Dublin Conservation Society](#), [South Dublin Conservation Society](#))

### **Chief Executive's Response**

Concerns about the over provision of 1 and 2 bed apartments has been addressed in Section 5.2.1 and 5.2.2 of the Plan. See Housing Mix section below.

Concerns raised in relation to the long-term scale of development proposed and the existing tenure model in Tallaght is acknowledged and accepted. See Section 6.14 below.

The request for the addition of reference to lifetime adaptable housing is noted and accepted.

The phasing provisions of the plan set out in chapter 8 address the physical and social infrastructure requirements of the plan. These are informed by a Social Infrastructure Audit contained in Appendix 3 of the plan.

The operation of management companies for private development is a matter related to the enforcement and or delivery of the provisions of the LAP, they are not matters for the detail of the LAP itself.

The Strategic Housing Development process is set out in in the Planning and Development Acts and in relevant national guidelines. There is no avenue for the LAP to set out its own policy in relation to how these planning applications are dealt with.

The existing standards and guidelines for apartment development which apply at a national level and which local authorities are required to adhere to adequately address issues of overshadowing, light and details such as balconies etc. Further guidance is provided through the Development Management standards set out in the County Development Plan and in the Local Area Plan itself.

The elderly housing scheme in Sean Walsh Park was subject to a separate public consultation process to the Local Area Plan and has been approved by the Council through that process. It is beyond the power of the LAP to alter that decision.

### **Chief Executive's Recommendations**

See below.

#### **6.14 SECTION 5.2.1-5.2.2 HOUSING MIX**

1. It is requested that the Council:
  - provide details of the measures in place to prevent a mono tenure approach in Tallaght and avoid the extremes of deprivation;
  - propose a mix of tenure target and a mix of dwelling size target for Tallaght Town Centre;
  - provide details of the total number of apartments in Tallaght and list the percentage of studio, one bedroom, two bedroom, three bedroom, four bedroom and larger apartments; and
  - restrict any housing development in Cookstown to family homes similar to those in Citywest and that no apartments will be built in Westpark, Village Green and Newtown. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
2. The housing mix as proposed in the LAP is welcomed and the submission considers that its implementation in this regard is a priority in order to ensure appropriate housing is provided for all demographics, including families. ([TTCLAP0048](#), [Belgard Residents Association](#))
3. The introduction of a legally binding element in the form of Section 47 agreements for private for sale units is highly questionable both legally and procedurally. It is not clear how this could reasonably be applied and would appear that the LAP policy is at odds with the BTR covenant mechanism provided for in the Apartment Guidelines, would be unworkable in practice and would undermine the viability of many apartment formats. A general policy on mix of tenure can avoid proliferation or over-concentration of any single type of development and can adapt to changing market conditions throughout the six-year LAP period and beyond. ([TTCLAP0031](#), [Alan Crawford](#), [BMA PLANNING](#), [The Owners of The Square Town Centre lands](#))

4. Concern expressed with reference of the Draft LAP to 'shared accommodation' in Section 5.2.2 which it considers to be a restriction on shared living and a negative slant on this type of accommodation, whilst welcoming reference that an evidenced based approach will be considered for such applications. There are compelling economic and planning rationale for this housing typology at this location and outlines a number of these reasons. It is requested that part of the text be removed. ([TTCLAP0041](#), [Bartra Capital Property Group](#), [Bartra Capital Property Group](#))
5. The submission suggests more focus is required on sheltered housing in areas that people currently live with respect to an aging population. It is contended that older people would benefit from sheltered living spaces that allow the freedom to live independently whilst providing new home with larger spaces to families. The submission notes that stronger enforcement is required with respect to apartments for their maintenance and upkeep upon completion. The submission considers that the European style provisions of shared storage space and laundrettes should be investigated as part of the service provision for apartment dwellers. ([TTCLAP0025](#), [Peter Byrne](#), [South Dublin Chamber](#))
6. Security of tenure and a genuine mixed tenure based on integration of individuals, couples and family units through public housing, owner occupancy and affordable rent is at the root of ensuring the development of the Tallaght Town centre is done on the best basis for those who live or aspire to live in Tallaght, and not on the basis of increased profiteering, inequality and exploitation of the housing crisis. ([TTCLAP0039](#), [Kieran Mahon](#))
7. The recent grant of permission for 403 student bed spaces in the area is noted and it is submitted that a sufficient level of student accommodation has been provided to cover the term of this Local Area Plan, based on the population projections in the South Dublin Core Strategy and the strategic population projections in the Regional Spatial and Economic Strategy. ([TTCLAP0019](#), [Gerard Stockil](#), [TCC](#))
8. In order to create vibrant and active new neighbourhoods a large proportion of family oriented 2 and 3 bed dwellings would need to be provided. Recent applications in the area have included a high proportion of small dwellings and these proposals, including SHDs, are not conducive to the kind of neighbourhood and community building being advocated by this draft LAP. It is acknowledged that the decision is to a large extent a function of national policy. It is submitted that policy relating to minimum requirement for 3-bed dwellings should also specify a minimum floor area for 3-bedroom apartments and houses. The opportunity exists in Tallaght as part of this redevelopment to design and develop modern high-density family dwellings incorporating safe and accessible play areas for kids that is interspersed with smaller dwellings catering for different household types. However, the specific development brief and criteria needs to be dictated to potential developers in order to achieve this type of development. It is requested that 50% of units be minimum of 3-bedrooms or more and that a specific SLO be indicated near Belgard for large family homes for key workers. ([TTCLAP0019](#), [Gerard Stockil](#), [TCC](#) [TTCLAP0033](#), [Zara Stockilk](#) [TTCLAP0049](#), [Tallaght Community Council](#) [TTCLAP0020](#), [Tony Bamford](#) , [tony bamford planning](#), [SDI \(Tallaght\) Ltd](#))
9. It is submitted, with reference to a report entitled 'Rebuilding the Irish Neighbourhood - How can we make mixed tenure communities work?' (Hayden & Jordan 2018), that there is strong government policy and an associated agency in place with objective to roll out new communities with a balanced tenure mix. It is also clear that a healthy tenure mix is much more desirable than high concentrations of one type of tenure in one small area or neighbourhood and can help reduce maintenance and regeneration costs to local government in the long term. It is submitted that the private sector alone cannot be tasked with delivering an appropriate housing tenure mix. It is submitted that the tenure mix proposed in the draft LAP does not present the widest possible mix of tenure as it does not include affordable housing. A proposed tenure mix is suggested of: Owner

Occupier 30%; Build to Rent 20%; Social 10%; Affordable 40% or, alternatively, Owner Occupier 40%; Build to Rent 10%; Social 10%; Affordable 40%. ([TTCLAP0019](#), [Gerard Stockil](#), [TCC](#))

10. It is acknowledged that in general, apartments in Tallaght are well built to a high standard and note that some apartment blocks are better maintained than others. However, the combination of existing apartment blocks becoming "built to rent" blocks due to sales to REITs (Real Estate Investment Trusts) and private investors, recently granted SHDs and the fashion of smaller apartments and build to let is considered to be totally inappropriate. The submission notes that REIT and large private investors have a place, but that the dominance of Build to Let in Tallaght is too high and must be ameliorated. TCC requests less apartments and more duplexes and homes and that there is a very low provision of 3-bed units in the area based on planning permissions granted. ([TTCLAP0049](#), [Tallaght Community Council](#))
11. Existing development in the vicinity of the Square and Hospital is considered to be overdevelopment and family friendly developments in Lucan and Adamstown could be a template for Tallaght. The minimum requirement for family sized accommodation in any new residential development must be maximised. The development of the Town Centre should be complimented by residential schemes but that cannot be licence for the large-scale development of transient small apartments in the Broomhill, Cookstown and Whitestown Areas. ([TTCLAP0021](#), [Ellen O Malley Dunlop](#))
12. The Plan should seek a ministerial order to ensure a proper and sustainable housing mix within zoned lands. ([TTCLAP0032](#), [Marie Corr](#))
13. The submission is in agreement with the housing and tenure mix proposals set out in the plan in order to develop more sustainable long-term communities. ([TTCLAP0037](#), [South Dublin Conservation Society](#), [South Dublin Conservation Society](#))
14. A number of submissions have raised concern with the Draft LAP objectives in relation to minimum requirements for 'Private for sale / owner occupation' and maximum limits on BTR developments, included on page 76. It is requested that this provision be removed from the LAP or amended in line with 10% requirements for social housing in accordance with the Planning and Development Act. Various issues include that this provision is legally unsound; would impinge on landowners constitutional right to own, transfer and inherit property, pursuant to Article 43 of the Constitution of Ireland; contravenes the 2018 Apartment Guidelines; lacks flexibility to respond to react to market demands; will prevent residential development; creates difficulties regarding viability and funding; may unintentionally make development unviable at this location; from an implementation standpoint does not reflect the interrelated issues of funding and viability; is unworkable and inappropriate as a LAP objective; and is difficult to implement practically due to the different design standards and management structures. It is put that this provision does not account for smaller sites which may be developed at 90% BTR and suggests that the provision that this requirement be offset on other sites isn't workable in Cookstown where ownership is fragmented. ([TTCLAP0006](#), [Eddie Bohan](#) [TTCLAP0014](#), [Thomas Hennessy](#), [McCutcheon Halley](#), [John Doyle and Paraic Mooney](#) [TTCLAP0015](#), [Brady Shipman Martin](#), [Brady Shipman Martin](#), [Glenveagh Properties PLC](#), [Tom Phillips](#) [TTCLAP0041](#), [Bartra Capital Property Group](#), [Bartra Capital Property Group](#) [TTCLAP0043](#), [Square Foot Property Services Limited](#), [Square Foot Property Services Limited](#), [Square Foot Property Services Limited](#) [TTCLAP0044](#), [Austin McHale](#), [Austin McHale](#) [TTCLAP0020](#), [Tony Bamford](#), [tony bamford planning](#), [SDI \(Tallaght\) Ltd](#))
15. A number of submissions have raised concern with the Draft LAP objectives requiring 30% of units to comprise 3-bedrooms or more, requesting that it be removed or amended. Many submissions refer to the housing mix across South Dublin County and the Tallaght area and would welcome a general policy to ensure an appropriate housing mix, whilst removing reference to a specific mix on a site by site basis. Various issues raised include that this provision of the Draft LAP contravenes the 2018 Apartment Guidelines given that an 'evidence based Housing Need and Demand

Assessment (HNDA)' has not been prepared; is ultra vires; is not deliverable under this LAP; will significantly impact on the viability and deliverability of apartment developments; is unsuitable and unworkable as a policy; is an unnecessary and onerous restriction; is exceptionally high and does not reflect reality on the ground; and will lead to higher apartment prices. ([TTCLAP0015](#), [Brady Shipman Martin](#), [Brady Shipman Martin](#), [Glenveagh Properties PLC](#), [TTCLAP0031](#), [Alan Crawford](#), [BMA PLANNING](#), [The Owners of The Square Town Centre lands](#) [TTCLAP0041](#), [Bartra Capital Property Group](#), [Bartra Capital Property Group](#) [TTCLAP0043](#), [Square Foot Property Services Limited](#), [Square Foot Property Services Limited](#), [Square Foot Property Services Limited](#) [TTCLAP0044](#), [Austin McHale](#), [Austin McHale](#) [TTCLAP0023](#), [Power Scaffolding Supplies limited](#), [Power Scaffolding Supplies limited](#) [TTCLAP0047](#), [Atlas GP Limited](#), [Atlas GP Limited](#) [TTCLAP0013](#), [Chris Browne](#), [Hughes Planning and Development Consultants](#), [Steelworks Property Developments Ltd.](#), [Absolute Limousines Ltd.](#), [Boherkill Property Developments Ltd.](#) & [Hollin Court Development Ltd.](#))

16. The submission agrees that any proposed housing/residential development is made up of a variety of household types, tenures and typologies, thereby creating a range of lifestyle, affordability and lifespan choices. This should ensure sustainable development with a diversity and mix of uses. ([TTCLAP0009](#), [Andrew Byrne](#), [Health Service Executive](#))

## **Chief Executive's Response**

### ***Housing Tenure Mix***

The many and varying submissions regarding the requirement for maximum proportion of BTR units and minimum number of private for sale units on a case by case basis are acknowledged. There are concerns regarding ongoing development proposals and the high level of rental tenure in the area which are considered to represent a mono tenure in Tallaght. There are also concerns regarding the viability and practical implementation of such requirements for tenure mix and questions as to the legality of this practice. SDCC is satisfied that setting a target for mixed-tenure and mix of housing types would be appropriate in the interests of building stable and mixed communities. However, it is considered that a specific requirement on a site by site basis may be difficult to implement and would not provide the flexibility to respond to evolving housing requirements and the ability of homebuilders to respond to housing demands.

The Council acknowledges the requirements of SPPR 7 of the 2018 Apartment Guidelines (extracted below) and notes that the BTR model, if applied, operated and managed as it is intended, will achieve the objective of attracting and retaining a less transient population. Section 5.6 of the Guidelines provides that there are a range of potential facilities that should be provided in conjunction with BTR in other jurisdictions such as dedicated laundry facilities, communal leisure areas, gym, workspaces/hotdesks, concierge service, etc. Facilities may also include private dining rooms, kitchen areas, office spaces, TV/lounge rooms, etc. that can be booked on occasion by individual residents for their own use.

## Specific Planning Policy Requirement 7

### BTR development must be:

- (a) Described in the public notices associated with a planning application specifically as a 'Build-To-Rent' housing development that unambiguously categorises the project (or part of thereof) as a long-term rental housing scheme, to be accompanied by 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 as such. Such conditions include 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 residential units are sold or rented separately for that period;
- (b) Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:

- (i) **Resident Support Facilities** - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.
- (ii) **Resident Services and Amenities** – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.

The Council acknowledges that Town Centres, by their nature, attract a level of short-term living. Security of tenure is addressed through the Residential Tenancies Act 2016 and it would be inappropriate to include requirements for security of tenure in the LAP.

The Council recognises the many submissions received regarding the need for affordable housing in the area and in this regard it is considered that clarification should be provided that the Council will support residential development proposals for affordable housing to meet the needs of those who have been registered on South Dublin County Council's affordable housing scheme.

### ***Housing Size Mix***

An appropriate mix of dwelling types and sizes is to serve a varied population at different life stages in the interests of building long-term sustainable communities.

The 2006 Tallaght LAP identified the predominance of conventional semi-detached, terraced and detached housing units in South Dublin County generally and the lack of choice for those who may not wish or need to live in three or more-bedroom houses. Developments within the Tallaght Town Centre area in the intervening period, and developments currently proposed, have primarily comprised of one- and two-bedroom dwellings. It was envisaged that three or more-bedroom houses in the wider

area would become available as one- and two-bedroom dwellings are provided with individuals and smaller families availing of the opportunities to downsize. Experience to date has shown that this has not been the case and recent research<sup>2</sup> from the Department of Housing, Planning and Local Government and the Economic and Social Research Institute (ESRI) has found that 75 per cent of householders aged 55 and above who own their homes do not wish to downsize and the remaining 25 per cent of people would consider moving in the right circumstances. There is therefore a need to provide for larger family homes, including apartments, in the Town Centre area in order to ensure that young families have the opportunity to remain in the area, where they have established a home as there is no certainty that family homes of three or more bedrooms in the surrounding area will become available on the scale necessary to accommodate the growing number of young families and families of four or more persons within the Tallaght Town Centre LAP boundary.

It is recognised that there will be high demand for one- and two-bedroom units in the area, however the demographic analysis undertaken in the preparation of the Plan indicates a growing proportion of the population in the Tallaght Town Centre area comprise of young families and growing families. Recent activity in the area, in terms of residential developments granted planning permission and proposed developments at various stages of the Strategic Housing Development process, have predominantly comprised of smaller units with studios, one- and two-bedroom apartment units.

The retention of families in this area as they grow is an important challenge for the LAP. In this regard, it is essential that an appropriate mix of dwellings be provided in this area to cater for a varied population at different life stages. Requirement for a minimum proportion of three or more-bedroom dwellings in the area has arisen given the prevalent housing mix in the area and being proposed in development proposals. In preparing the draft LAP and by including provision for a minimum 3-bedroom requirement, SDCC sought to gauge the appetite in the market for the delivery of 3-bedroom units in the Tallaght LAP lands. Notwithstanding this, the requirements 'Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities' preclude statutory development plans from implementing a minimum requirement for three or more-bedroom apartments in the absence of a Housing Need and Demand Assessment (HNDA). It is recognised that a Housing Need and Demand Assessment (HNDA) for the Dublin region will be prepared in the near future and that specific requirements for new developments in terms of the housing mix should be based on the evidence basis arising from this exercise. It is considered that the policy requirements of the LAP on a site-specific basis should be amended to reflect the preparation of the HNDA, upon which these requirements will be reviewed to provide clearer site-specific guidance.

#### **Specific Planning Policy Requirement 1**

**Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).**

Submissions on the Draft LAP have broadly indicated support for a general policy/objective that there be an appropriate housing mix in the LAP lands and it is considered appropriate to maintain a policy

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<sup>2</sup> <https://www.irishtimes.com/business/economy/most-older-people-not-prepared-to-downsize-study-finds-1.4081936>

objective which seeks to ensure an appropriate unit mix in the area. Arising from this policy objective the Planning Authority will closely monitor development proposals coming forward for development to ensure that an appropriate housing mix will be provided and to avoid an over proliferation of mono-tenure or types of housing. In this regard, development proposals will be requested to demonstrate how they comply with the policy objective for an appropriate mix of unit types and sizes based on the demographics trends.

### Chief Executive's Recommendation

- (1) Amend Section 5.2.1 as follows:

~~Assuming continued growth in the number and size of families in the area based on recent trends, the young population and the predominance of pre to early stage families, the following policy is proposed in order to accommodate the envisaged growth in families of 4 or more persons in the area:~~

~~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~~

Replaced with the following:

*It is policy of the Council to ensure an appropriate housing mix is provided within the LAP lands, which responds to demographic demands of the area in terms of a balanced provision of housing sizes. In this regard, residential development proposals shall state the proposed dwelling size mix and provide justification for the range of dwellings to be provided having regard to the needs of the area, demographic trends in the area and viability.*

*This provision will be reviewed pending the completion of a Housing Need and Demand Assessment (HNDA) for the Dublin area.*

*The Planning Authority will closely monitor developments in the LAP area and will seek to avoid an over proliferation of dwelling types or sizes which do not adequately serve the needs of a varied population. In the absence of preparation of the Housing Need Demand Assessment, where it is clear that a monotonous form of housing tenures or sizes is becoming apparent in the area the Planning Authority will require development proposals to address shortfalls in housing need.*

- (2) Amend Section 5.2.2 as follows:

~~It is therefore policy of the Council that the following housing/occupancy mix for residential development be applied across the LAP on a site by site basis, to be demonstrated at planning application stage:~~

- ~~• A minimum of 30% of dwelling units for owner occupation / private sale~~
- ~~• A maximum of 60% of dwelling units for Build to Rent~~
- ~~• A minimum of 10% of dwelling units for social housing (Part V)~~

~~These requirements may be transferred between sites within the same neighbourhood area subject to a clear justification for not meeting the requirement on an individual site and subject to the overall balance specified above being achieved in the neighbourhood area. Any transfer of this mix requirement will only be considered where supported by a clear demonstration at planning application stage of how the mix will be achieved across multiple sites and a statutory declaration from the owners of these sites committing to the delivery of the housing occupancy mix on their lands.~~

~~Where permission is granted for a residential development, the applicant will be required to lodge with the Land Registry a burden on the properties identified as for owner occupation / private sale, in the form of a Section 47 agreement, restricting these dwelling for a period of 7 years to owner occupation / private sale, unless otherwise agreed in writing with the Planning Authority.~~

~~On sites where a developer demonstrates that 30% private sale / owner occupation units cannot be achieved based on assessment against Plan criteria including viability considerations, an alternative scenario may be considered. However, provision of more than 60% BTR must be accompanied by evidence that the level of BTR provided is justified. Proposals for student accommodation will be considered in the context of the proximity of the teaching hospital at Tallaght and TUD.~~

Replaced with the following:

*In the interest of providing an appropriate housing tenure mix it is policy of the Council that all residential development proposals shall state the proposed tenure mix and provide justification for the proposed mix having regard to the socio economic and demographic context of the area. It is an ambition of the LAP to encourage the provision of at least 30% owner occupied units across the LAP area.*

*This provision will be reviewed pending the completion of a Housing Need and Demand Assessment (HNDA) for the Dublin area.*

(3) Add text to Section 5.2.2 as follows:

#### ***Affordable Housing***

*South Dublin County Council has launched a scheme of Affordable Housing aimed at those who do not qualify for social housing supports, but struggle to purchase or rent their own home on the market. The Council therefore supports residential development proposals which provides for the accommodation needs of those who have a specific need for affordable housing and have registered with the South Dublin County Council Affordable Housing Scheme.*

*It is policy of the Council to support the provision of Affordable Housing in the area. In this regard, the Council encourages residential development proposals which address the needs of those who have registered with South Dublin County Council's affordable housing scheme. Flexibility with regard to the housing tenure and typology mix will be considered where it is demonstrated that 50% or more of the dwellings in a residential development are provided for Affordable Housing, as defined by the Council.*

#### ***Elderly Housing and Care***

*It is an objective of the LAP to facilitate the delivery of elderly housing accommodation, stepped down care accommodation and other forms of assisted living accommodation which can benefit from close proximity to existing services and facilities.*

*It is an objective of the LAP to encourage and facilitate the delivery of Lifetime Adaptable Housing.*

## **6.15 CHAPTER 6: HERITAGE AND CONSERVATION**

1. EPA suggests that Chapter 6 should consider also including information on natural heritage aspects (including landscape) of the Plan. Highlighting the findings and key recommendations arising from the various environmental assessments carried out might be useful to consider including here also. This would show how aspects such as air quality, noise, landscape etc. have

been considered in preparing the Plan. ([TTCLAP0004](#), [Cian O'Mahony, Environmental Protection Agenc](#))

2. Proactive awareness, promotion and enforcement of the Architectural Conservation Area (ACA) guidelines is required to preserve and reverse damage done to the historic quarter, including a direct mail to every property in the ACA advising them of the history of their building and the planning guidelines they must adhere to. There is a need for better value of our National Monuments and a proactive plan with all of the landowners in the Tallaght Village ACA in order to protect national monument and utilise them as tourist attractions. Changes to the architectural structures on Main Road should be restricted to own door family homes. The ACA should be extended to take in the original St. Mary's School. The historic walls on Main Street need to be valued and with the express agreement permission from the Priory a project to complete the reveal of the stonework should be completed. A proactive audit comparing the ACA with 2009, in order to identify changes and to proactively address unauthorised changes e.g. signage and external works such as doors, roller shutters, windows and roofing etc. ([TTCLAP0008](#), [Gerard Stockil, TCC, Tallaght Community Council](#))
3. National Monuments Service welcomes the publication of the Draft Tallaght Local Area Plan draft which covers a section on Heritage and Conservation (Section 6.0) and broadly agrees with the wording expressed in this section of the LAP. The submission suggests two recommendations:
  - In Section 6.2 it states that Recorded Monuments are 'included in the Record of Protected Structures' and goes on to list Protected Structures. This is incorrect and should be revised as Recorded Monuments are specifically archaeological heritage sites and included in the Record of Monuments and Places (RMP).
  - In Section 6.3 there is a typographic error: where it says disengage it should read signage (4th paragraph).
  - It requested that any additional documentation received or in the event of a final decision being made, that details of same are forward to Department of Culture, Heritage and the Gaeltacht. ([TTCLAP0030](#), [Manager Dau, Dept. of Arts, Heritage and the Gaeltacht](#))
4. A community centred and heritage expert led village design statement is badly needed to prevent further mix of streetscape styles that denigrate the village origins and heritage. As the ACA in the County Town it should be best in class, however only through the work of volunteers and the community prompting inappropriate signage etc, is the ACA being saved from destruction. ([TTCLAP0036](#), [Tara De buitlear](#))
5. It is questioned whether the Heritage Trail includes a museum and whether a design statement is planned for the Architectural Conservation Area. It is requested that a SLO identify a site and undertake a design for a heritage centre. ([TTCLAP0033](#), [Zara Stockilk](#))
6. There is a rich heritage and identity in the area, particularly Tallaght Village. Proposals in the Local Area Plan for a Heritage Trail, Arts and Cultural Space and Visitor Information Points are commended. However, the policy of the Council to safeguard and promote Tallaght's natural, culture and built heritage assets needs to be strengthened further. The LAP has the opportunity to:
  - Stronger rules to prevent the old village streetscape being overshadowed by new larger development. Landmarks such as the Priory and St Maelruan's require better protection to that which existed 15-20 years ago when poorly designed apartment blocks were erected immediately adjacent to sensitive historic landmarks.
  - A vision for the derelict sites in Tallaght Village such as the old Greenhills Road and former petrol station site that include imaginative civic spaces that revitalise the village.

- The naming process for all new streets and developments can utilise not only the existing geographic names for the neighbourhoods set out in the plan (Cookstown, Broomhill and Whitestown) but imaginatively use the names of the many famous historic figures from Tallaght's ancient history. ([TTCLAP0021](#), [Ellen O Malley Dunlop](#))
7. It is contended that the plan should make provision for the reestablishment and maintenance of the wetland/biodiversity area adjoining Sean Walsh Park. ([TTCLAP0037](#), [South Dublin Conservation Society, South Dublin Conservation Society](#))

### **Chief Executive's Response**

Comments of the EPA in relation to addition of text referring to findings of environmental assessments is noted and accepted.

Comments and recommendations in relation to the management of and development with the ACA are noted. Chapter 6 of the LAP has been prepared with the detailed input of the Council's Conservation officer. It is considered that the provision in the LAP which provide detailed guidance on how future development should be addressed within the LAP is sufficient to provide guidance for future development within the ACA. Section 6.5 of the Plan requires a design rationale to be submitted with proposals for development within the ACA which addresses the design process for the development and how the proposal will integrate with the historic environment with reference to; Urban grain, urban structure, density and mix, scale, material and detailing, landscape, views and landmarks and historical development. This section goes on to say that new development should reflect the building stock and be clearly read as modern interventions into the Main Street/Historic Core. Enforcement issues are addressed through the planning enforcement section of the Council. The ongoing management of the ACA's is carried out by the Council's Conservation Officer, proposals for alterations to the ACA areas are addressed through the County Development Plan review process This will commence early 2020.

It is also noted that Section 6.2 requires that a detailed Conservation Plan be prepared for the Priory and St Maelruan's Sites prior to any significant development. The purpose of the plan will be to thoroughly assess the impact of any development and address how it will contribute to the conservation of historically significant structures and landscape elements. This provision to be highlighted as an objective of the Plan. Text amended accordingly.

The comments and recommendations of the National Monuments Service are acknowledged and accepted. Text to be amended accordingly.

Street naming issues are addressed through the naming and numbering process operated by the Council.

Details relating the Heritage Trail are matters for the Council's Tourism Strategy.

Detailed interventions in the ACA are not matters for the Local Area Plan. Its purpose is to provide clear guidance for planners and the public in relation to future development within the ACA.

It is noted that some of the submissions arise from the arrangements of headings and text. In order to facilitate the accurate interpretation of this Section of the Plan, the order of sections should be amended.

### **Chief Executive's Recommendation**

- (1) Add text which summarises the findings of the SEA/AA to this chapter.
- (2) Add following text relating to new development within the ACA.

*Any proposals for development within the Architectural Conservation Area (ACA) shall include a design rationale addressing the impact of the proposed development on the ACA, including how the proposal will integrate with the historic environment.*

- (3) Amend paragraph 2 of Section 6.2 to read as follows:

*There are a number of Protected Structures and Recorded Monuments in Tallaght which are included in the Record of Monuments and Places RMP and listed also in the Record of Protected Structures.*

- (4) Amend text in section 6.3 to read as follows:

*Features/deposits preserved in-situ shall be accompanied by appropriate and sensitive explanatory signage.*

- (5) Add the following text to section 6.2:

*Any proposals for the future development of the Priory or St Maelruan's shall be accompanied by a detailed Conservation plan which will assess the impact of any development and how it will contribute to the conservation of historically significant structures and landscape elements.*

## 6.16 CHAPTER 7: CLIMATE CHANGE AND ADAPTATION

1. EPA welcomes the inclusion of Section 7 Climate Change: Mitigation and Adaptation stating that it is a positive step in integrating climate change into land use planning and decision making. Submission also welcomes the requirement that pollution prevention plans and construction environmental management plans will be required for future development of regeneration zones. ([TTCLAP0004](#), [Cian O'Mahony, Environmental Protection Agenc](#))
2. Irish Water welcomes the objectives on surface water management and green infrastructure. as a positive influence on the development of Sustainable Urban Drainage in the area and the management of the surrounding water courses. ([TTCLAP0010](#), [Irish Water, Irish Water](#))
3. The inclusion of climate adaptation measures in section 7.4 of the Draft LAP is welcome. To enhance the LAP's contribution to greenhouse gas mitigation efforts, climate mitigation should also play a key part in the LAP's overarching objectives, which currently only address adaptation. ([TTCLAP0029](#), [Phoebe Duvall, An Taisce](#))
4. The Draft LAP contains strong objectives on the provision of a multifunctional, interconnected, and bio-diverse green infrastructure (GI) network in Tallaght. However, objectives specifically addressing the protection of existing biodiversity and the regulation of activities/development in key wildlife areas, such as Sean Walsh Park, areas should be added. ([TTCLAP0029](#), [Phoebe Duvall, An Taisce](#))
5. The submission states that policy around low carbon heat generated from Data Centre developments lacks detailed information on their significant impacts on the grid, on water, and on long term economic stability and employment opportunities. It is considered that these issues are looked at further in the Plan. ([TTCLAP0035](#), [Paula Gilligan](#))
6. The Department of Culture, Heritage and the Gaeltacht welcomes the commitment to protect and enhance biodiversity which is evident in the Draft Tallaght Town Centre Local Area Plan. The submission notes that there are proposals set out in Section 3.8 Whitestown of this plan to 'Provide new green infrastructure and amenity corridor along Whitestown Stream connecting Killinardan Park and Sean Walsh Park' and in Section 7.2.6 Green Infrastructure Strategy 'that the stretch of the Whitestown Stream, which passes through Whitestown will be opened up and will

accommodate a strategic cycling route'. However, the submission highlights that an ecologically rich belt of trees and wetland type vegetation has developed along this stretch of the Whitestown Stream and constitutes a valuable wildlife corridor between the two parks referred to. It is considered that proposals may possibly significantly reduce the existing biodiversity value of this corridor. The submission recommends that prior to these proposals being finally adopted as part of this local area plan, that an Ecological Impact Assessment of them is undertaken, which should include detailed ecological surveys of the Whitestown section of the Whitestown Stream. It is also recommended that any development plans for the St. Mary's Dominican Priory's grounds and the Technological University of Dublin/Tallaght Campus should take account of the existence of an established heronry in mature trees located in the Priory's grounds, and that herons may also be nesting in trees on the adjacent campus. In addition, as part of the Local Area Plan, the Council should look to rehabilitate the Sean Walsh Park following recent damage caused to it. It requested that any additional documentation received or in the event of a final decision being made, that details of same are forward to Department of Culture, Heritage and the Gaeltacht. ([TTCLAP0030](#), [Manager Dau, Dept. of Arts, Heritage and the Gaeltacht](#))

7. DES notes that SDCC wish to support particular standards that are not referenced in the National Building Regulations. SDCC is requested to recognise, where the DES energy policy is sufficiently developed to effectively respond to its unique requirements, or is developed in line with central Government policies and the National Building Regulations, that the enforcement of their plan wide policies could create an undue burden on school development. In particular the specific policy of green roofs (7.4.1) on school buildings clashes with other education sector specific conservation measures and strategies. Similarly, Passive House Standards (7.4.4) are not appropriate for school developments due to user profiles. The DES has established its own development standards and sector specific energy strategies. Therefore the LAP should be revised to state that where sector specific standards are established and meeting climate change mitigation and adaptation targets then they can be substituted on developments for that sector e.g. schools. ([TTCLAP0018](#), [Alan Hanlon, Department of Education & Skills](#))
8. All future development within Tallaght should be designed so as to reduce carbon footprint and should incorporate environmentally friendly proposals in their design stage, such as the integration of public transport, minimise energy use, SuDS, water recycling and conservation, and the integration and utilisation of open space. Energy efficiency in development proposals and the council's involvement in 'Heatnet' are welcome. ([TTCLAP0009](#), [Andrew Byrne, Health Service Executive](#))
9. The submission recommends that all future developments are examined for the opportunity to integrate green infrastructure into the design at planning stage with a number of specific recommendations arising from 'Research 195: Health Benefits from Biodiversity and Green Infrastructure'. A strategic aim of the LAP should be to develop a Local Biodiversity Action Plan, preserving existing green areas, exploring all opportunities for green infrastructure and integrating into the design of public areas. ([TTCLAP0009](#), [Andrew Byrne, Health Service Executive](#))

### **Chief Executive's Response**

Comments from An Taisce in relation to the inclusion of objectives specifically addressing the protection of existing biodiversity and the regulation of activities/development in key wildlife areas, such as Sean Walsh Park, areas should be added.

Climate mitigation objectives are fundamental to the overarching objectives and principles of the Plan, including inter alia the creation of walkable neighbourhoods built on proximity to public transport, employment and services which reduces car dependency, more intensive use of appropriately located and built up lands and the greening of primarily grey urban environment

Comments in relation to the lack of detail on the Tallaght District Heating Network Project are noted. This project is being carried out through EU Regional Development Funding in partnership with Dublin's Energy Agency Codema and a network of partners across five EU states. Therefore, the LAP itself has no remit in relation to how the project is managed. Its success and impact on gird etc are issues which will arise from the ongoing role out of the project. It is however the role of the LAP to encourage and facilitate development such as this.

Section 3.8 of LAP 'Provide new green infrastructure and amenity corridor along Whitestown Stream connecting Killinardan Park and Sean Walsh Park' and in Section 7.2.6 Green Infrastructure Strategy the plan states 'that the stretch of the Whitestown Stream, which passes through Whitestown will be opened up and will accommodate a strategic cycling route'. The Department of Arts, Culture and the Gaeltacht submission highlights that an ecologically rich belt of trees and wetland type vegetation has developed along the course of the Whitestown Stream at this location which constitutes a valuable wildlife corridor between the two parks referred to. It is considered that proposals may possibly reduce the existing biodiversity value of this corridor. The submission recommends that prior to these proposals being finally adopted as part of this local area plan, that an Ecological Impact Assessment of them is undertaken, which should include detailed ecological surveys of the Whitestown section of the Whitestown Stream. This is considered to be acceptable.

The submission also includes reference to heronry on trees within Priory lands adjoining TUD, which should be reflected in an objective relating to any development on these lands.

The Draft LAP included indicative location of integrated constructed wetland. This should further be expanded on with an objective relating to the rehabilitation of Sean Walsh Park following recent damage.

Department of Education submission in relation to DES energy standards is noted and accepted. It is also noted that the DHPLG plans to issue guidelines in relation to energy efficiency in public buildings including schools in 2020.

In relation to the preparation of a local Biodiversity Action Plan, it is noted that the Council is currently in the process of preparing a County wide Biodiversity Action Plan. Requirements for local Biodiversity Action Plan should follow on from the provisions of the countywide plan.

It is recommended that Sections 7.43, 7.4.4, 7.4.5 and 7.4.6 of the Plan be updated to reflect the current position in regard to Climate Change policy as they pertain to the Plan.

The changes primarily relate to an update of the District heating policy to reflect current proposals in Tallaght including operation, DH ready provisions, and provision of service. Updates to reflect changes in national policy around Part L of the building regs and some minor comments/ changes are also recommended.

### **Chief Executive's Recommendation**

(1) Add objective re:

*the protection of existing biodiversity and the regulation of activities/development in key wildlife areas.*

(2) Add following requirement:

*Prior to any works being carried out to open up the Whitestown Stream as a cycling / pedestrian corridor, an Ecological Impact Assessment of proposals should be undertaken, which should include detailed ecological surveys of the Whitestown section of the Whitestown Stream.*

(3) Add objective requiring protection and preservation of Heronry located on Priory lands and extending into TUD lands.

- (4) Add objective re rehabilitation of lands to south west of Sean Walsh Park adjoining existing ponds.
- (5) Add text:
- where sector specific (DoES, HSE etc.) climate change mitigation and adaptation targets are established these shall be applied within the LAP area.*
- (6) Add text to Sections 7.43, 7.4.4, 7.4.5 and 7.4.6 of the Plan to reflect the current position in regard to Climate Change policy as they pertain to the Plan, including South Dublin County Council Climate Change Action Plan. The changes primarily relate to an update of the District heating policy to reflect current proposals in Tallaght including operation, DH ready provisions, and provision of service. Updates to reflect changes in national policy around Part L of the building regs and some minor comments/ changes are also recommended.

## 6.17 CHAPTER 8: IMPLEMENTATION AND SEQUENCING

1. Irish Water notes that the draft LAP does not provide information on the capacity of wastewater infrastructure to serve the projected growth envisaged. There are some constraints in the area, Airton Rd in particular. Irish Water are currently preparing a Drainage Area Plan (DAP) for the Dodder Valley Catchment which includes Tallaght. Sewer Network Surveys are ongoing across the catchment. It is envisaged that the DAP will be completed at the end of 2021 / early 2022. ([TTCLAP0010](#), [Irish Water](#), [Irish Water](#))
2. Irish Water notes that the required demand would have to be modelled the against latest network demands should the LAP be adopted and as developments progress. New connections may be assigned on a first come, first served basis until any necessary capital works are completed. Works will be developer led. Developers should engage early with IW through the IW New Connections or Pre-Connection Enquiry Process. IW will then assess and review the local network to develop a solution / options for the developer's proposals. ([TTCLAP0010](#), [Irish Water](#), [Irish Water](#))
3. Irish Water notes that the draft LAP does not provide information on future demand for water supply. As part of ongoing analysis, IW has identified that, at present, the water supply in the Greater Dublin area does not have the required level of resilience particularly during peak demand events which generally coincide with high temperatures and drought periods. To address this, IW has developed a plan for developing and integrating new sources of water over the coming years that will allow the region to conform to best international standards in terms of water supply. ([TTCLAP0010](#), [Irish Water](#), [Irish Water](#))
4. Irish Water must carefully manage existing supplies to maintain levels of service to existing water users and to best facilitate all required growth (domestic and non- domestic) across the region in the interim period. As this information is not provided in the draft LAP text, IW would welcome early engagement between SDCC and IW, should the LAP be adopted. If development progresses, IW would have to model the required demand against latest network demands to ascertain local network upgrade requirements. ([TTCLAP0010](#), [Irish Water](#), [Irish Water](#))
5. The submission from the Office of the Planning Regulator (OPR) states that the draft LAP should consider sequential development and phasing programme for the LAP area, having regard to the provisions of the Local Area Plans Guidelines for Planning Authorities (DEC&LG, 2013). It is a recommendation of the OPR to include an infrastructure delivery programme and schedule consistent with the guidelines above in the draft LAP to provide for a sequential development and phasing programme in relation to necessary investment in water services, public transport, community facilities, and schools, as relevant. ([TTCLAP0028](#), [Maude Ni Bhrolchain](#), [Office of the Planning Regulator](#))

6. The submission states that the plan lacks detail and that it is possible to draw up detailed plans which fit within national and regional planning policies and objectives, in respect of mix of tenure/ownership, variety of housing type, building height, housing density and impact on traditional housing nearby. ([TTCLAP0048](#), [Belgard Residents Association](#))
7. Concern expressed that the main tenets of this Draft document does not take into account the fragmented ownership pattern and long-term lease arrangements that are prevalent across, in particular, the Cookstown precinct. It is suggested that the roll out of development, as envisaged by the phasing and development requirements of the Draft LAP, is more akin to that of an LAP on a greenfield suburban site. ([TTCLAP0041](#), [Bartra Capital Property Group](#), [Bartra Capital Property Group](#))
8. A number of submissions request that all references to sequential development be removed from the LAP. While the Draft LAP does not envisage a strict phasing approach, significant concern is expressed with reference to sequential approach to development in the Plan. It is submitted that such an approach is too simplistic and can frustrate and impede ready to go development sites and development potential of available sites, particularly in Cookstown where ownership is fragmented. ([TTCLAP0041](#), [Bartra Capital Property Group](#), [Bartra Capital Property Group](#) [TTCLAP0044](#), [Austin McHale](#), [Austin McHale](#))
9. The LAP should specifically recognise and identify the role of SDCC and the Land Development in delivering required infrastructural items and explore funding through the Urban Regeneration and Development Fund to address deficiencies. The local authority, in conjunction with the Land Development Agency, must take a lead role in infrastructure delivery and brownfield regeneration, including use of CPO process. ([TTCLAP0041](#), [Bartra Capital Property Group](#), [Bartra Capital Property Group](#))
10. A number of submissions express significant concern with development phasing being linked to provision of pocket parks which, it is stated will undermine the regeneration objective of the for these lands, particularly given the fragmented ownership pattern across the wider area. Specific unit no./beds pace figures which indicate when certain infrastructure will be required are arbitrary, without foundation and requests that they be removed. ([TTCLAP0041](#), [Bartra Capital Property Group](#), [Bartra Capital Property Group](#) [TTCLAP0043](#), [Square Foot Property Services Limited](#), [Square Foot Property Services Limited](#), [Square Foot Property Services Limited](#))
11. Clarity is requested from the Council as regards key infrastructural items and the ability to offset their delivery against development contributions. ([TTCLAP0041](#), [Bartra Capital Property Group](#), [Bartra Capital Property Group](#))
12. The engagement of Local Authorities or State agencies in the purchasing- compulsory or otherwise, or taking into hand of unused land, vacant or derelict sites within the LAP for social use could positively alter the ability to shape the plan in a more positive way. ([TTCLAP0039](#), [Kieran Mahon](#))
13. SDCC should consider ways strategic planning can protect population health and the built environment should be explored for opportunities that can maximise health gain. It is highlighted that the draft Plan's 'implementation and sequencing strategy' is an excellent initiative. ([TTCLAP0009](#), [Andrew Byrne](#), [Health Service Executive](#))
14. There are no unique amenities or "Must see" facilities in this plan in any of the proposed architectural projects for the County Town. There is no signature amenity like The Spire, GPO, Apple Square, Meeting Plaza proposed for the County. It considers that all our public buildings, such as County Hall and The Civic Theatre, are now dwarfed by surrounding apartment blocks. TCC expects to see at least one significant civic project that delivers in the lifetime of each LAP for the County Town. ([TTCLAP0049](#), [Tallaght Community Council](#))

15. The '14 Key Projects' are noted, broadly welcoming some and providing support, suggesting local residents may have specific comments on some, requesting more details and exact design on some projects, requesting that 'Changing Places toilet facilities' be incorporated. The submission objects to the provision of elderly housing in Sean Walsh Park. It is requested that the astro pitches indicated in the southwest of Sean Walsh Park be relocated adjacent to the Stadium. It is suggested that the Tallaght Heritage Trail needs a stronger community input. It is requested that the affordable housing scheme be all for purchase and not built to rent. ([TTCLAP0049](#), [Tallaght Community Council](#) [TTCLAP0033](#), [Zara Stockilk](#))
16. The submission recommends that the LAP should provide a clarifying statement for the progression of any application for planning permission once a delivery programme is in place for the Airton Road Extension. It is also suggested that a requirement for open space relating to the Uniphar lands should be stated as follows: 1 no. Urban Space to be developed alongside the re-development of the former Uniphar lands along Belgard Square North. Urban Space to be provided in a phased manner alongside the development of these lands to the north east of the town centre. ([TTCLAP0047](#), [Atlas GP Limited](#), [Atlas GP Limited](#))
17. There are major question marks around the deliverability of an Urban Square at this location in Cookstown. There are established businesses on site with significant staff numbers and investments in their existing premises. There is no intention of relocating, which would prove to be an expensive, complex and time-consuming process. Funding for the urban square has not been adequately explained in the Draft LAP, which only refers in a general sense to potential funding sources such as the Urban Regeneration Development Fund and reference to potential for a 'Supplementary Development Contribution Scheme'. ([TTCLAP0027](#), [Ed Barrett](#), [Gravis Planning, Print and Display Limited](#), [Downtree Investments Limited](#), [PD Visual Limited \(T/A P&D Visual\)](#) and [Westside Press Limited](#))

### **Chief Executive's Response**

The comments of Irish Water in relation to water, surface and foul sewerage are noted and accepted. In order to address their concerns, the phasing tables should be amended to reflect existing short- and long-term capacity issues in the area. Text also to clarify that connections will be permitted on a case by case basis. This will apply across all neighbourhoods.

A number of submissions oppose the sequential nature of the phasing requirements on the basis of fragmented ownership of area, is too simplistic and will frustrate 'ready to go development'. The success of the LAP especially the delivery of quality infrastructure is dependent on the implementation of a strong sequential approach to the delivery of infrastructure. If requirements are not included around the delivery of essential public realm pieces and open spaces, pocket parks and urban squares; there is no mechanism for their delivery.

A number of submissions require SDCC to take a stronger role in delivery of infrastructure through. The phasing and implementation provisions provide for SDCC involvement in delivery of essential infrastructure through central government funding, use of its own landbank and use of CPO powers is acknowledged and incorporated into LAP.

Comments in relation to key projects are noted. These are as set out by the Corporate body of SDCC and are not matters which the LAP can influence.

Submissions relating to the provision of the Urban Square serving the northern section of Cookstown is addressed in Section 6.9 of this report. It is acknowledged that the exact location is not tied to that shown in drawings. The phasing requirements make provision for flexibility in respect of its location and responsibility for its delivery. No further amendment required.

Issues around building height, tenure, density, housing mix etc are addressed in Sections 2.6, 6.6, 6.13 and 6.14 of this Report.

The Phasing and sequencing tables will be amended to address the issues raised by the OPR and Irish Water. While the information needed is clearly set out in the existing presentation, the addition of columns addressing these issues separately will provide clarification. Columns addressing Scheduling and Responsibility and funding issues to be added. Also separate to Chapter 8, the specific phasing requirements for each neighbourhood to be included within the Neighbourhood Guidance in Chapter 3 and cross referenced with Chapter 8. Phasing approach to still appear in Chapter 8 but detailed tables to appear in Neighbourhood Guidance in Chapter 3.

Arising from the Department of Education's submission, the schools requirement should be updated.

It is considered that the urban design approach provides sufficient opportunity for delivery of unique and important facilities in the LAP lands.

The Council does not accept insufficient detail is provided.

### Chief Executive Recommendations

- (1) For clarity phasing requirements for each neighbourhood to be incorporated into relevant neighbourhood. Overall approach as set out in Chapter 8, detail of tables for each neighbourhood to be either duplicated or cross referenced between chapters 3 and 8 cross referenced with Neighbourhood Guidance.
- (2) Phasing table to be amended with addition of two columns: Scheduling and Delivery Responsibility and Funding. Amendments also to table to clarify approach to be taken in relation to water and sewerage, power, gas etc. This also addresses issues raised in relation to SDCC involvement/ use of state land/ funding streams etc.
- (3) Amend wording in Section 8.4.1 as follows:

*At this stage it is anticipated that ~~2~~ 3 primary schools and a secondary school will be required within or in very close proximity to the plan area. The plan identifies a potential location for ~~the first primary school and~~ the secondary school. A site for the ~~second~~ primary schools has not yet been identified. ~~It is intended that~~ South Dublin County Council will maintain a strong working relationship with the Department regarding the provision of schools within the plan area. The plan does identify a set of SDCC objectives for locating the primary schools, however, this will need to be actively assessed and monitored within the plan area once permissions have been granted for c. ~~16800-21,000~~ units.*

- (4) Amend wording for 'neighbourhood/sub neighbourhood requirements' to reflect clarifications recommended within this Report relating to community, transport interchange and Poddle, as follows:

*1 no. new community space required per 5,000 population growth (c.2,000 units) in the Centre or Cookstown neighbourhoods. The ~~Planning Authority will actively engage with the Community Section of South Dublin County Council to ensure sufficient community facilities are planned for demand for, and delivery of, this facility will be assessed~~ once 1,500 units have been permitted in the Centre and Cookstown neighbourhoods.*

*~~Bus Connects~~ Transport Hub and Interchange within area ~~land take as~~ identified in the Urban Design Framework for this plan or as otherwise agreed with the Lead Agencies.*

*Explore the feasibility of uplifting the ~~Uplift of~~ River Poddle and incorporating into public realm, open space and green/blue infrastructure asset strategies as part of proposals for development.*

*Belgard Square North Link Road and Airton Road Extension prior to, or in tandem with, adjacent ~~new~~ development.*

- (5) Update wording for consistency to refer to 'Belgard Urban Square' and 'Cookstown Urban Square' as urban square or plaza throughout the Plan.
- (6) Update reference to Chamber Square to read as Library Square throughout Plan.
- (7) Amend text in phasing tables in Chapter 8 in relation to pocket parks and urban squares removing details of dimensions of parks. All housing and beds pace quantum associated with the delivery of pocket parks will be updated and amended, where necessary.

## 6.18 CHAPTER 9: TALLAGHT SPECIFIC DEVELOPMENT STANDARDS

1. The Department notes the regard the LAP has to the provision of educational facilities, however the statement that the Planning Authority will have regard to the 'impact on residential amenity' (page 129) is of concern. Ultimately the provision of schools is intended as a positive impact for residential amenity. The Department seeks a clearer statement regarding that positive impact. Please refer also to the Department's suggestions regarding how to handle the issue of building height and overlooking in the proper planning, design and development of schools. ([TTCLAP0018, Alan Hanlon, Department of Education & Skills](#) )
2. The submission outlines specific concerns about a number of Development Management Policies in the Draft Tallaght LAP which are considered to be contrary to current national policy and the requirement to provide additional housing through increased densification. The submission relates specifically to building height; plot ratio and general policy relating to requiring minimum of 3 n. bedroom units. ([TTCLAP0023, Power Scaffolding Supplies limited , Power Scaffolding Supplies limited](#))
3. The submission welcomes the proposal for all medium to large scale development proposals to be accompanied by a Design Statement. It is recommended that any housing development should incorporate the principals outlined in the 'Design Out Crime' Document. The regulation of noise impacts for developments is welcomed and it is recommended that the environmental noise should be considered in the context of potentially noisy developments, explicitly avoiding mixed retail/residential blocks with food or pub businesses. The LAP should implement the Waste Hierarchy and place prevention and minimisation at the forefront of any waste policy. Light pollution is a potential source of complaint from residents adjacent to development sites and developers must be cognizant of this potential nuisance and plan accordingly. The LAP should aim to reduce polluting emissions into air and increase the quality of air in Tallaght and a number of monitoring recommendations are set out. It is incumbent on developers to plan and cater for dust and litter from windblown building sites. ([TTCLAP0009, Andrew Byrne, Health Service Executive](#))

### Chief Executive's Response

Impact on residential amenity of existing areas of any new development including schools is a standard part of the assessment of any new development. No further clarification considered necessary.

The Council is satisfied that the provisions in relation to delivery of a Design Statement is comprehensive. The principles of the Design Statement has at its core the issues of safety and security of people living and working in the area.

### Chief Executive Recommendations

No further amendments recommended.

## 6.19 APPENDIX 2: CONTEXT AND PROCESS

1. The submission considers that the Plan should work and be implementable in the short-term, 6- and 7-year period as well as long term, 20 years. ([TTCLAP0048, Belgard Residents Association](#))
2. The 2006 plan was sold based on the 2002 census which showed a need for housing in Tallaght for aging people who wished to scale down, sell their houses and move into the apartments in Tallaght Town Centre. What has happened instead, as predicted by the people in the area, is the apartments are overwhelmingly investment properties with 58% rented privately in a country where the average tenancy according to the PRTB is two years and one month. Pockets of Social Housing, offering the most secure housing within the LAP boundary, account for 20% of the total in an area ([TTCLAP0039, Kieran Mahon](#))

### Chief Executive's Response

It is the view of the Chief Executive that the plan is implementable in the short, medium and long term.

Issues relating to tenure and housing mix are addressed in Chapter 5

### Chief Executive's Recommendation

No further amendments recommended.

## 6.20 APPENDIX 3: SOCIAL INFRASTRUCTURE AUDIT

1. The Department welcomes the inclusion of an SIA in the plan and considers it very useful. When it is embedded as a standard content it could when reviewed in a timely way, assist the Department in developing the basis of a cyclical assessment of latent potential for additional enrolments or further developments at existing school sites. This would be a useful evaluation tool to better project the requirement for additional school places, new schools or new school sites. The SIA also provides a key opportunity to establish a hierarchy, or at least a selection priority, for locating schools adjacent to amenities, new and existing, where the amenities cannot be located on smaller urban sites. This should be a primary key adjacency consideration for school site selection. ([TTCLAP0018, Alan Hanlon, Department of Education & Skills](#))
2. It is stated that the Draft LAP's Social Infrastructure Audit outlines open space requirements for the LAP with the requirement for the Cookstown area, on the basis of population projections, being 5.9ha. It is stated that the Audit notes that the 'proposed' level of open space within the Cookstown area (encompassing proposed 'pocket parks', existing green areas, etc.) is 17.65ha, i.e. well in excess of minimum requirements. It is therefore submitted that the proposed 'New Urban Square' is not a necessity in terms of meeting the required Open Space levels for the Cookstown area and that the Draft LAP has not provided any compelling rationale around the need for a 'New Urban Square' at this site. ([TTCLAP0027, Ed Barrett, Gravis Planning, Print and Display Limited, Downtree Investments Limited, PD Visual Limited \(T/A P&D Visual\) and Westside Press Limited](#))

### Chief Executive's Response

Notwithstanding the findings of the SIA in respect of open space provision, (it is welcomed that the provision of open space was found to be more than adequate), it does not negate the principles of good urban design which requires quality open space provision in this case a public square proximate to transport nodes and higher density residential and commercial development proximate to such transport nodes. The phasing requirements in relation to the Belgard Urban Square in the northern part of Cookstown are clarified in Section 6.18 above. The Council is satisfied that this provision is appropriate and necessary.

### Chief Executive's Recommendation

- (1) Update text to reflect any impact of detailed amendments throughout the Plan.
- (2) Clarify quantity of open space required in the area and the quantity provided based on function and usability of open spaces.

## 6.21 APPENDIX 4: STRATEGIC FLOOD RISK ASSESSMENT

1. The submission from the Office of the Planning Regulator (OPR) notes that the draft LAP has been subject of a Strategic Flood Risk Assessment (SFRA) which identifies sites at risk and requires that they be subject to site-specific flood risk assessment. However, whilst the SFRA considers the potential extent of flood zone A in the event of climate change, the implications for the extent of flood zone B is not evident from the assessment, and its implications for the development of lands within the Whitestown area within the potential extent of the said flood zone do not appear to have been fully considered. Furthermore, the OPR states that residential use is provided for on 'EE' zoned lands in Flood Zones A and B. The OPR requests that the planning authority resolve this matter in consultation with the OPW. ([TTCLAP0028](#), [Maude Ni Bhrolchain, Office of the Planning Regulator](#))
2. The OPW consider that one of the main objectives set out within the SFRA report is to develop a suite of flood zone maps for Tallaght Area using readily derivable information. JBA are advised to consult with Nicholas O' Dwyer (working on Poddle Flood Alleviation Scheme) to gather the most pertinent information and any relevant updates within the SFRA. The following figures and associated text in the draft LAP could benefit from update, according to the OPW; Figure 4.1, 4.2, 4.3, 6.2 and 6.3. ([TTCLAP0024](#), [Karen Donovan, Office of Public Works](#))
3. The provision of playing pitches and all-weather playing facilities should be carefully considered in the context of Flood Risk and management. ([TTCLAP0037](#), [South Dublin Conservation Society, South Dublin Conservation Society](#))

### Chief Executive Response

Content of submissions are noted. Submission has been reviewed and some updates are now recommended. The SFRA will be amended accordingly. The Council confirms that no changes to zoning are proposed. The concern of the OPW are therefore addressed.

Any proposals for all weather pitches etc will be assessed on the basis of the flood data pertaining to any specific area. This issue is addressed as part of the consent process for such developments and is not a matter for the LAP.

### Chief Executive's Recommendation

- (1) The SFRA will be amended to reflect updates to policy, data on flood risk and otherwise since preparation of SFRA.

## 6.22 APPENDIX 5: STRATEGIC ENVIRONMENTAL ASSESSMENT

1. EPA recommends clarifying the assessment findings for the different alternatives considered. While Section 3.2 Consideration of Alternatives of the SEA, includes figures associated with each the alternatives, only the preferred alternative is described in section 3.3. Consider summarizing / tabulating the potential likely significant effects for each alternative, taking into account Table 3 Strategic Environmental Objectives. This would help support the identification of the preferred alternative.

In relation to the preferred alternative, including a table showing the assessment findings of the potential likely significant effects of the Plan against the Strategic Environmental Objectives should also be considered. This would help ensure that where potential adverse environmental impacts are identified, they are provided with appropriate mitigation measures in the plan to minimise or avoid these impacts. ([TTCLAP0004](#), [Cian O'Mahony, Environmental Protection Agenc](#))

2. EPA states that chapter 3.2 should consider including a reference to the Climate Action Plan 2019, Noise Action Plan for South Dublin County Council, and the Planning, Land Use and Transportation Outlook 2040 (PLUTO). Also consider removing the reference to the National Spatial Strategy (now replaced by National Planning Framework) and remove the reference to the Local Authority Adaptation Strategy Development Guidelines (EPA, 2016) and replace with the Local Authority Adaptation Strategy Development Guidelines (DCCA, 2018). ([TTCLAP0004](#), [Cian O'Mahony, Environmental Protection Agenc](#))
3. EPA refers to the recently launched Environmental Sensitivity Mapping (ESM) WebTool, a new decision support tool to assist SEA and planning processes in Ireland, available at [www.enviromap.ie](http://www.enviromap.ie). ([TTCLAP0004](#), [Cian O'Mahony, Environmental Protection Agenc](#))

### Chief Executive Response

Submission has been reviewed. Chapter Six (Section 6.2) of the SEA ER provides details on the alternatives considered including alternatives 1 to 3 (figures and bullet points); whilst Section 6.3 provides details on Alternative 4 specifically developed to address recent policy and planning changes as they relate to higher densities. Section 6.4 tabulates the four alternatives and assesses them for significant environmental effects relating to the Strategic Environmental Objectives. Section 6.5 discusses the preferred alternative and states 'In terms of population, human health, material assets and landscape, Alternative 3 combined with elements of Alternative 1 is identified as creating most positive interactions with these SEOs.' For clarity, the recommendation that a table showing the significant environmental effects of the preferred option is noted and will be included in the Final SEA ER as it does provide a more detailed and robust evidence for the preferred alternative. Aligning the preferred alternative in tabular format with the mitigation measures is also welcomed and will be included as a summary table in the Final SEA ER and SEA Statement as appropriate. The SEA will be amended accordingly.

### Chief Executive's Recommendation

- (1) The SEA will be amended to reflect updates to policy and otherwise since preparation of SEA and to incorporate comments of EPA, including to codify objectives of LAP.

## 6.23 APPENDIX 5: MISCELLANEOUS

1. This submission welcomes the opportunity to take part in the public consultation process and acknowledges the importance of this LAP at time. Concern is raised regarding the SHD process and in particular with regard to current applications in the system which are to be decided prior to the LAP being adopted. ([TTCLAP0048](#), [Belgard Residents Association](#))
2. The SHD process is considered to be ineffective in that it has removed the right to appeal, diminished the Local Authority process, and is ineffective in speeding up house building. The SHD review is welcomed. ([TTCLAP0048](#), [Belgard Residents Association](#))
3. The submission raises concerns regard the request for input on the draft LAP and provides an example of two developments where objections and views were made known, but developments were granted. It is considered that the 'Gateways' and 'Neighbourhoods' have been in the pipeline since 2006 and are simply as vision. ([TTCLAP0045](#), [Máire Ford](#))
4. The submission questions property tax and where will it be allocated to? i.e. schools, business, community services etc. ([TTCLAP0045](#), [Máire Ford](#))
5. It is considered that SDCC does not have up to date housing figures as it has not publicly published Review of Housing Strategy of the County Development Plan and there is a lack of knowledge of where development land is located. ([TTCLAP0049](#), [Tallaght Community Council](#))
6. There are scant details on the design of developments and structure. SDCC are invited to actively engage with all local community groups. While acknowledging some good parts in the plan, TCC does not consider it require significant rework and should not pass without drastic amendment. TCC submits that figures for jobs and houses do not stack up and are unrealistic, that there appear to be inconsistencies in the size of areas and hectare figures provided and questions whether 3,000 apartments is too much for Tallaght Town Centre, where houses will be provided, where jobs will be provided and where parks will be provided. ([TTCLAP0049](#), [Tallaght Community Council](#))
7. A 'Welcome to Tallaght' sign should be erected along the N81/M50 gateway. ([TTCLAP0049](#), [Tallaght Community Council](#) [TTCLAP0033](#), [Zara Stockilk](#))
8. Details requested as to the breakdown of land uses in the LAP area, how many jobs and dwellings will be created by 20206 and where these will be located. ([TTCLAP0033](#), [Zara Stockilk](#))
9. The name Tallaght has been eroded by D24 and other terms and that it is important to protect the place name Tallaght, including in the name of the Technological University. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
10. The provision of homeless shelter and family hubs in a balanced way across the County is welcomed. It is requested that the Council provide a breakdown of the number of homeless shelters and family hubs in the local electoral areas in South Dublin and that Policy H1 Objective 6 of the County Development Plan: 'To facilitate the development of emergency accommodation, including hostels for homeless individuals and families in a balanced way located throughout the County and not concentrated in any particular area' is strictly adhered to. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))
11. It is requested that a more open flow of information and not a data protection based lack of discussion. Concern is raised that submissions to public consultations on previous statutory plan preparations were no address or were not publicly available. ([TTCLAP0008](#), [Gerard Stockil](#), [TCC](#), [Tallaght Community Council](#))

12. It is requested the Council publishes an update on the number of infill social housing sites approved under Part 8 and present a percentage breakdown of the number of these dwellings in the Tallaght, Clondalkin, Lucan, and Templeogue/Rathfarnham local electoral areas. ([TTCLAP0008, Gerard Stockil, TCC, Tallaght Community Council](#))
13. It is requested that the Council provide a report detailing the following request made in 2009: 'That this Committee urges the Dept of Environment to sign an Order to exclude the Tallaght Town Centre from the Rent Supplement Scheme - not to include existing rent supplemented tenancies within the area - and seeks the support of all elected members of this Council' An update is requested on whether this question actually submitted to the Department, what was the response, and have any areas of Tallaght Town Centre been excluded from the Rent Supplement Scheme as a result of this motion which was passed by Tallaght Councillors. ([TTCLAP0008, Gerard Stockil, TCC, Tallaght Community Council](#))
14. It is requested whether SDCC can detail if any design competition, as detailed in the Tallaght Town Centre Local Area Plan 2006 (page 142), were used during the lifetime of the plan for the area indicated, and if so, provide details of the winners. ([TTCLAP0008, Gerard Stockil, TCC, Tallaght Community Council](#))
15. It is suggested that a Citizen's Assembly in respect of the Local Area Plan could complement, not substitute, the statutory process and give the community an enhanced role in developing and taking ownership of the vision for how Tallaght will evolve over the next 50 years with the benefit of local practical knowledge and expertise. ([TTCLAP0021, Ellen O Malley Dunlop](#))
16. Extreme disappointment that, as significant employers and commercial stakeholders in the area and, in the context of the proposed 'Urban Square' for Cookstown, a key party to enabling the achievement of plan objectives, have not been directly engaged by the Council at any stage of the LAP process. It is submitted that the number of submissions received at pre-draft stage should have made it clear to the Council on the basis of this limited response, that a more active engagement strategy was appropriate in preparing the Draft LAP, including direct engagement with key stakeholders. Notwithstanding this, the owners and occupants of this site are open to meeting with the Council at all stages in advance of the LAP being finalised. ([TTCLAP0027, Ed Barrett, Gravis Planning, Print and Display Limited, Downtree Investments Limited, PD Visual Limited \(T/A P&D Visual\) and Westside Press Limited](#))

### **Chief Executive's Response**

While the Council is broadly appreciative of the many and varying submissions on the above matters, a number of issues raised are beyond the remit of this LAP to address, such as matters in relation to Strategic Housing Development procedures, day to day operational functions of the Council, matters to be addressed in the County Development Plan, naming of Tallaght, local community forums/assemblies, housing assistance, part 8 developments elsewhere,

A number of items raised above are addressed elsewhere in this Report, such as signage, standards for design, land use functions, development potential, various forms of housing,

The Council fully supports a strong identity for Tallaght as the County Town and recognises the importance of this identity in the communities, institutions and businesses in Tallaght and through various functions of the Council, including tourism, events, public realm and Council-led developments.

It is of concern that a number of consultees have raised issues with methods of consultation and lack of engagement. The Planning Authority seeks to engage all interested parties through various methods in the consultation process for preparation of the Draft and following publication of the Draft and continuously strives to adapt to new methods of communication and collaboration. The Planning

Authority undertakes an extensive exercise to ensure that all submissions are read, understood, responded to in this Report and inform changes to the LAP where appropriate.

**Chief Executive's Recommendation**

No further amendments recommended.

## 7.0 CHIEF EXECUTIVE'S SUMMARY OF RECOMMENDED AMENDMENTS

Table 3 below provides a summary of the recommended amendments to the Draft Tallaght Town Centre Local Area Plan.

**Table 3 Summary of Recommended Amendments**

Section	Category Issue	Recommendation Amendments
All	General / Acknowledgement	Codify the objectives and policies contained within the LAP.
All	General / Acknowledgement	In addition to the specific amendments recommended in this Chief Executive's Report, the Chief Executive recommends that amendments to the Draft Plan be made for general typographical errors, punctuation, formatting, grammatical errors & inconsistencies in tables/ figures, maps and text.
Chapter 1	Introduction & Policy Context	Update objective bullet point 5 on page 9 of the Draft LAP as follows:  <i>Respect, protect and promote our natural and built heritage and architectural features...</i>
Chapter 1	Introduction & Policy Context	Refer to 'Spatial Planning and National Roads Guidelines for Planning Authorities (2012)' in Figure 1.3 and Section 2.2.1 of the LAP and that proposals for enhanced public realm and connectivity across the N81 for pedestrians and cyclists will be carried out in consultation with the NTA and TII.
Section 2.3	Urban Framework	Add the following text clarification as note to end of Section 2.3.  <i>The proposed urban structure is a guide for future development in the area and is not intended to be rigidly adhered to. Flexibility in relation to the proposed urban structure will be considered where it is demonstrated that the overarching objectives of the urban framework and key elements of the proposed urban structure are achieved in any alternative layout.</i>
Section 2.3	Urban Framework	Add following text to section 2.3 of the LAP:  <i>The Council will initiate urban design competitions on Council owned land and will encourage applicants to do the same on privately owned land, as considered appropriate where the building or site in question is considered to be of significant importance to the build-out of the LAP.</i>
Various	Urban Framework	Amend text to remove specific size requirements for Urban Squares where they appear in text across the document.
Section 2.3 and Appendix 2	Urban Framework	Include cross reference to Appendix 2 on plan making and urban design process and update text as necessary.
Section 2.3	Urban Framework	Include minor amendments to the block plans as appropriate within the final framework plan and as addressed in the following sections.
Section 2.2.3	Access & Movement	Add text to Section 2.2.3 as follows:  <i>In particular, the LAP supports the following;</i>

			<ul style="list-style-type: none"> <li>- Accommodation of the emerging Greenhills to City Centre Bus Corridor;</li> <li>- The development of a transport hub in Tallaght Town Centre which facilitates ease of access for residents, workers, shoppers and visitors to all public transport services and facilitates seamless interchange between all bus services; between bus services and Luas; and between cycling, bus and Luas; and</li> <li>- Development of the Greater Dublin Area Cycle Network, with particular priority given to route 9A and SO5.</li> </ul>
Section 2.2.1	Access Movement &		<p>Add text to Section 2.2.1 as follows:</p> <p><i>The N81 National Secondary Route traverses the LAP lands. It is an objective of the plan to provide cycle and pedestrian routes which facilitate ease of access across the N81 between the Town Centre and Sean Walsh Park, surrounding residential areas, The Stadium and ultimately the Dublin Mountains. Any future proposed works shall be agreed with TII and the NTA and are required to comply with Section 28 Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities (2012).</i></p>
Various	Access Movement &		Amend urban structure in The Centre neighbourhood to north of Belgard Square North to clarify requirement for green amenity route through these lands.
Various	Access Movement &		Remove 'Removed Pedestrian Bridge' from diagrams.
2.2.2	Pedestrian & Cycle Movement		<p>Add/amend the following text in Section 2.2.2 to highlight 'filtered permeability':</p> <p><i>It is an objective of the Council to encourage the principle of filtered permeability at suitable locations throughout the LAP area.</i></p> <p><i>The Council will encourage pedestrian and cyclist priority, i.e. 'filtered permeability', to be demonstrated in development proposals, particularly those incorporating proposed cycle routes, strategic amenity routes and tertiary routes. This may be in the form of 'home zones' which are designed primarily for people, restricting through routes for vehicular traffic or other appropriate solutions.</i></p> <p><i>SDCC will facilitate and engage with permeability projects where required in order to link residential areas by bicycle to the strategic cycling network and by walking and cycling to local services, including public transport.</i></p>
2.2.2	Pedestrian & Cycle Movement		<p>Add provision to extend Luas bicycle parking provisions to all Luas stops within the plan lands to Section 2.2.2:</p> <p><i>It is an objective of the Council to extend Luas bicycle parking facilities already provided at the Terminus Luas stop and other Luas stops located with the LAP area.</i></p>
2.2.3	Public Transport		Add following note to Section 2.2.3:

		<i>Any development arising from the provisions of the plan and which may have a direct impact on the Luas line or its operation must be agreed with TII and all other relevant stakeholders.</i>
9.2	Public Transport	Add following text to Section 9.2:  <i>Where development is located within a 500m catchment of the Luas line, the provisions of TII 'Code of Engineering practice for works on, near, or adjacent the Luas light rail system' must be adhered to.</i>
Various	Land Use & Urban Functions	Remove urban functions/uses from Figures 2.5, 3.2, 3.6, 3.9, 3.12, 3.15, 3.18, 3.21, 3.24 to avoid confusion and include alternative base map with 'Mixed-Use Frontages'.
Various	Mixed-Use Frontages	Reflecting clarification of extent of mixed-use frontages remove the mixed-use frontages indicated at the following locations and other minor amendments to mixed-use frontages:  <ul style="list-style-type: none"> <li>- Along the entirety of Broomhill Road within Broomhill neighbourhood,</li> <li>- Along the northern side of Airton Road within Broomhill neighbourhood,</li> </ul> <p>Along either side of Greenhills Road north of junction with Airton Road, within Broomhill and Greenhills neighbourhoods.</p>
2.4	Land Use	Add paragraph in Section 2.4 stating that tools available to the Planning Authority, including the Vacant Sites Levy, will be actively used to discourage vacancy.
Various	Employment	Include text in Section 2.4 and 4.2 referring to preliminary findings of employment survey and potential of this area to accommodate additional employment levels in tandem with residential development through more intensive uses, due to low density of workers per floorspace in industrial uses currently prevalent across the LAP lands.
2.4.2	Mixed-Use Frontages	Add text to Section 2.4.2 for clarity as follows:  <i>Appropriate uses at ground floor level on mixed use frontages can include offices, commercial, services, community facilities, recreational facilities, etc. This is an opportunity for existing businesses and facilities in the area which can be suitably accommodated alongside residential uses. The potential to accommodate non-traditional ground floor uses should also be explored, such as car showrooms and mechanics, which are prevalent in the area and could be accommodated in residential developments subject to appropriate mitigations measures to negate potential impacts on residential amenity, provided they are in compliance with the zoning objectives for the area.</i>  <i>In the design of non-residential floorspace the development management standards of the County Development Plan should be applied and, in particular, there will be a need to consider the size and layout of the proposed space to ensure it will offer attractive spaces to businesses. Applicants are encourage to set</i>



		<ul style="list-style-type: none"> <li>• <i>High capacity public transport stops (i.e. a Luas stop or high frequency bus stop (i.e. 10-minute peak hour frequency) on a dedicated bus lane);</i></li> <li>• <i>The proposed ‘New Urban Square’ north of Belgard Square North in the Centre neighbourhood;</i></li> <li>• <i>The proposed ‘New Urban Square’ within the Cookstown neighbourhood; and</i></li> <li>• <i>The proposed Transport Interchange and adjacent proposed ‘Urban Space’ in the Centre neighbourhood.</i></li> </ul> <p><i>This provision will only apply to the extent of a site which is within 100m walking distance of the above locations and will only be considered where the Planning Authority is satisfied that provision of the above facilities will be achieved.</i></p>
2.6.1	Plot Ratio	<p>Amend text in paragraph of Section 2.6.1, page 23 as follows:</p> <p><i>In considering minimum plot ratio for the neighbourhoods, the Planning Authority will have regard to established uses and in general, will allow flexibility in assessing planning applications for extensions to support established uses, schools or other community infrastructure. This is particularly relevant in Whitestown, Greenhills and TUD/TC. The minimum plot ratio will apply to the full redevelopment of any site in the Plan lands.</i></p>
2.6.1	Plot Ratio	<p>Amend/add text in Section 2.6.1, page 23 as follows:</p> <p><i>The plot ratio and building height of any proposed development shall not normally exceed the maximum plot ratio or building height thresholds for any particular site, block or parcel of land, except where there is a compelling case of a significant public or economic benefit.</i></p> <p><i>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;</i></p>
Various	Development Capacity	Review development capacity figures referred to arising from proposed changes to Draft Plan and consider splitting to include in various chapters
Various	Height and Built Form	Clarify that the heights provided for in the LAP, including diagrams, are ‘up to’.
2.6.2 and 3.2	Height and Built Form	<p>Add following heading and text to section 2.6.2 before ‘<b>Landmark Buildings</b>’</p> <p><b>The Centre</b></p> <p><i>The height standards set out above may be exceeded in the Centre neighbourhood where they reflect the height of existing buildings, particularly in the core of the town centre proximate to the Luas Terminus and The Square Shopping Centre, subject to Section 2.6.</i></p>
Various	Height and Built Form	Include new height band for The Centre of 7-8 storeys (+1 recessed) residential, 6-7 storeys (+1 recessed) non-residential.

2.6.2	Height and Built Form	<p>Amend section 2.6.2 ‘<b>Landmark Buildings</b>’ as follows:</p> <p>Move the final paragraph under ‘<b>Landmark Buildings</b>’ to be the first paragraph.</p> <p><i>In the interest of place making and improving legibility, Landmark Buildings are permissible at key locations that will punctuate urban areas. In general, buildings that exceed the prescribed general buildings heights should only be provided at the locations indicated as having ‘Potential for Higher Buildings’ in the Building Height Strategy (see Figure 2.4) and at locations adjacent to the key public transport stops and key public spaces identified in Section 2.6.</i></p> <p><i>A 2–<del>3</del>–4 storey increase on the above typical levels may be considered for key or landmark sites or where sites exceed 2ha in area and can establish its own identity (see Section 8.2 Implementation). <del>Buildings over 10 storeys would generally not be supported</del></i></p>
Various	Urban Structure	Include minor amendments to the block plans as appropriate within the final framework plan.
2.6.2	Design, Built Form and Finishes	Remove lower portion of figure 2.8, the upper portion of Figure 2.8 adequately demonstrates the concept of Urban Grain.
2.6.2	Design, Built Form and Finishes	<p>Amend Section 2.6.2 ‘<b>Building Setback</b>’ as follows:</p> <p><i>Development across the Plan lands should present strong building frontages close to street edges, <del>except where otherwise identified to provide for Green/Blue Infrastructure, parking, wide footpaths, etc.</del> Setbacks from the street edge should therefore be minimised.</i></p>
Various	Public Realm and Open Space	Amend drawing 4.2 and all associated drawings to clarify that the location of the Cookstown Urban Park is indicative only but indicating it must be delivered jointly by developers on lands in their ownership and in the vicinity of the junction of Cookstown Road and Second Avenue provide and within walking distance of public transport nodes and all higher density development in the northern section of Cookstown.
2.7	Public Realm and Open Space	Add provision for Council to carry out public art competitions for future proposed public squares within the plan lands as deemed appropriate.
2.7	Public Realm and Open Space	<p>Update the following for consistency:</p> <p><i>It is <del>an objective of the Council to prepare the policy of the council to develop and implement</del> a <del>detailed</del> public realm strategy for the plan area.</i></p>
2.7	Public Realm and Open Space	<p>Amend Section 2.7.2 for consistency as follows:</p> <p><i>Where identified in the open space strategy and Urban Framework for the LAP, the Planning Authority will seek the delivery of identified areas of public open space. The proposed ‘New Urban Squares’ <del>are more fixed in nature</del> will be central and vital community resources for new communities and should be</i></p>

		<p><i>provided in accordance with the criteria set out in Section 8.4.2 of the LAP in the vicinity of the locations identified. The Council will seek the delivery of these areas as public open spaces in accordance with phasing requirements, working with landowners to provide these spaces. <del>providing a vital community resource for new communities.</del> ‘Local Pocket Parks’ and smaller ‘Urban Squares’ are more flexible in nature in terms of their location and their delivery will be sought on a site by site basis in the development management process, unless reasonable alternatives are proposed and it is demonstrated how these will be achieved.</i></p>
2.7 and various	Public Realm and Open Space	<p>Amend text in Section 2.7 to include description of pocket park and requiring their function, dimensions and sizing to be addressed in the relevant Urban Design Statement: <i>A ‘pocket park’ is a small outdoor space for passive and small-scale active recreation, similar to a small park or square and plaza, as defined in the County Development Plan.</i></p> <p><i>‘New Urban Squares’ and ‘Urban Spaces’ provide for civic amenity in usually high-density areas with varying degrees of passive and active recreation, similar to a square and plaza, as defined in the County Development Plan.</i></p>
Chapter 8	Implementation and Sequencing	<p>Amend text in phasing tables in Chapter 8 in relation to pocket parks and urban squares removing details of dimensions of parks. All housing and beds pace quantum associated with the delivery of pocket parks will be rationalised and updated, where necessary.</p>
3.2	The Centre	<p>Add text at end of Section 3.2 for clarity to reflect Section 2.3 as follows:</p> <p><b>Block Structure</b></p> <p><i>Flexibility in relation to individual site and block structure will be considered where it is demonstrated that the principles and key elements of the proposed urban structure are achieved. This is particularly relevant to key landmark sites, such as the Square Shopping Centre, where opportunity exists to provide buildings of architectural merit which contribute to the character of the Town Centre core area, public realm improvements and enhance connectivity at a strategic location proximate to the Luas terminus and proposed transport interchange.</i></p>
3.2	The Centre	<p>Amendments to the block plans as appropriate within the final framework plan, including:</p> <p>Remove indicated building frontages on ‘OS – Open Space’ zoned lands at Westpark next to the junction of Belgard Road and N81.</p> <p>Provide for building block adjacent to Transport Interchange.</p> <p>Provide east-west pedestrian route between the Square and Belgard Square West along southern extent of area currently indicated for Transport Interchange.</p>

		<p>Amend block structure immediately north-east of the Square and at southern entrance to the Square.</p> <p>Remove 'Removed Pedestrian Bridge'.</p> <p>Include new height band for The Centre of 7-8 storeys (+1 recessed) residential, 6-7 storeys (+1 recessed) non-residential and apply to areas recognised for increased heights in the core of the town centre proximate to the Luas Terminus and The Square Shopping Centre.</p> <p>Update amenity/pedestrian route line of east-west-north 'Existing/improved water course' and 'Existing/improved landscape' and immediately adjoining tertiary routes.</p> <p>Amend height of block directly adjacent to SDCC's office to reflect height of building directly to the north of Belgard Square North.</p>
3.2	The Centre	<p>Amend the 'Land Use Mix' for The Centre in Section 3.2 of the Draft LAP as follows:</p> <p><i>A broad mix of uses in accordance with zoning objective in the County Development Plan <del>Mixed uses including, retail, office-based employment, civic and residential development to complement existing commercial development. New development areas to include supporting non-residential development particularly at ground floor level.</del></i></p>
3.2	The Centre	<p>Amend/add the following key objective in Section 3.2 of the Draft LAP as follows:</p> <p><i>Support the continued function and future expansion of services of Tallaght Hospital and facilitate improved access to the Hospital</i></p> <p><i>Facilitate economic development and provide an enterprise centre, employment generation, and provide an Innovation Centre which supports small business and accommodates growth and future success of local businesses.</i></p> <p><i>Encourage new development on existing areas of surface car parking and support in principle the relocation of existing surface parking and roof parking spaces associated with The Square in new multi-storey and/or underground car parks, subject to high quality urban design and integration with the objectives of permeability and mixed-uses in the Centre neighbourhood.</i></p> <p><i>Provide enhanced cyclist and pedestrian connectivity across the N81 between the Town Centre and Sean Walsh Park, The Stadium and ultimately the Dublin Mountains, subject to agreement with the TII and the NTA and with regard to Section 28 Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities.</i></p> <p><i>Explore the feasibility of uplifting the River Poddle and incorporating into public realm, open space and green/blue</i></p>

		<i>infrastructure asset strategies as part of proposals for development.</i>
3.2	The Centre	Add paragraph after final paragraph on Page 16 as follows: <i>SDCC is committed to facilitating and supporting the delivery of a transport interchange integrating Luas, bus, cycle &amp; taxi together with a quality public open space. Subject to the agreement of SDCC, NTA and TII for the design and delivery of the proposed Transport Interchange and public urban space, the indicative location of the proposed transport interchange may include residential or commercial development as part of an integrated development which adheres to the vision and urban design objectives of the LAP.</i>
3.2	The Centre	Add to 'Building Height' provision as follows: <b>The Centre</b> <i>7-8 storeys (+1 recessed) residential, 6-7 storeys (+1 recessed) non-residential.</i> <b>Quality height provisions in The Centre</b> <i>The height standards set out above may be exceeded in the Centre neighbourhood where they reflect the height of existing buildings, particularly in the core of the town centre proximate to the Luas Terminus and The Square Shopping Centre, subject to Section 2.6.</i>
3.3	Cookstown	Amend the vision for Cookstown in Section 3.3 of the Draft LAP as follows: <i>An attractive mixed-use <del>residential</del> neighbourhood, which is residential led with more intensive enterprise and employment uses, with distinctive urban qualities and high levels of access to public transport and the urban centre.</i>
3.3	Cookstown	Merge and amend the 'Land Use/Urban Functions' and 'Land Use Mix' for Cookstown in Section 3.3 of the Draft LAP as follows: <i>A residential-led area, with a greater mix of use around Luas stops. A focus on more intensive enterprise, employment and innovation uses associated with existing uses such as the Hospital and TUD-Tallaght. Community, social and other <del>small</del> walk to services <del>will be acceptable in other locations.</del> to provide for a growing residential population.</i>
3.3	Cookstown	Amend/add the following key objective in Section 3.3 of the Draft LAP as follows: <i>Emergence of a vibrant mixed use residential-led neighbourhood.</i> <i>Create new urban block structure.</i> <i>Deliver a mix of new open spaces, including provision of a new urban square at a central location at, or in close proximity to, the junction of Cookstown Road and Second Avenue. The exact</i>

		<p><i>location, design and delivery of this space to be progressed by SDCC in discussion with landowners in the area.</i></p> <p><i>Encourage and facilitate higher intensity employment uses and economic development.</i></p> <p><i>Encourage design proposals to provide appropriate space to accommodate non-residential uses, particularly for existing businesses in the Cookstown area which can be appropriately accommodated in a mixed-use development with a substantial residential component.</i></p> <p><i>Explore the feasibility of uplifting the River Poddle and incorporating into public realm, open space and green/blue infrastructure asset strategies as part of proposals for development.</i></p>
3.4	The Village	Amend the boundary of the Village neighbourhood to include the Priory lands zoned for 'VC – Village Centre'
3.4	The Village	Modify Section 3.4 to acknowledge inclusion of the Priory and associated uses.
3.4	The Village	<p>Merge and amend the 'Land Use/Urban Functions' and 'Land Use Mix' for Cookstown in Section 3.3 of the Draft LAP as follows:</p> <p><i>Mix of uses in accordance with the County Development Plan zoning objective for 'VC - Village Centre', including residential, appropriate retail, walk to services, cultural, civic, recreational, community and other uses which support the evening economy.</i></p>
3.4	The Village	Amend the indicated building frontage for the vacant site in the Village Centre (bound by Greenhills Road to the east, Main Street to the South and Old Greenhills Road to the west) by replacing the south western corner of this frontage with an 'Urban Space'.
3.4	The Village	<p>Amend/add the following key objective in Section 3.4 of the Draft LAP as follows:</p> <p><i>Develop the tourism potential of the historic village in accordance with a Tourism Strategy for the area, including a heritage trail and potential community and cultural attractions.</i></p> <p><i>Protect the character and integrity of the Priory, including its parkland setting, and provide for greater public access and usage.</i></p> <p><i>Protect and preserve Heronry located on Priory lands and extending into TUD lands.</i></p> <p><i>Provide for some residential or mixed-use development on lands to the east of the Priory, subject to the above key objectives.</i></p>
3.5	Broomhill	<p>Amend the vision for Broomhill in Section 3.5 of the Draft LAP as follows:</p> <p><i>An attractive consolidated, diversified and intensified place for business and employment that is better connected to</i></p>

		<i>surrounding places. Emerging residential uses along <del>primary frontages</del> the southern side of Airton Road</i>
3.5	Broomhill	Merge and amend the 'Land Use/Urban Functions' and 'Land Use Mix' for Broomhill in Section 3.5 of the Draft LAP as follows:  <i>Predominantly business, enterprise and employment area with more mixed-use residential development fronting along <del>Greenhills Road and</del> the southern side of Airton Road, subject to integrating effectively with existing surrounding uses.</i>
3.5	Broomhill	Include the following 'Building Heights' in Section 3.5 of the Draft LAP:  <i>Retain the existing building line set back along Airton Road, particularly along the southern side of Airton Road for the provision of a linear park.</i>
3.5	Broomhill	Amend open space requirements in Broomhill as follows:  <i>Local green corridors</i>  <del><i>Local Pocket Park along Airton Road or</i></del> <i>Linear Park along Airton Road and along southern boundary with TUD/TC with new building frontage overlooking.</i>
3.5	Broomhill	Amend/add the following key objective in Section 3.5 of the Draft LAP as follows:  <i>Maintain buffer along stream on southern edge of Broomhill neighbourhood.</i>  <i>Maintain existing building line set back along Airton Road and seek delivery of a linear park along southern side of Airton Road in tandem with development.</i>
3.5	Broomhill	Amend urban structure plan for Broomhill to omit indicative open space to north of Airton Road and set back building line south of Airton Road to reflect requirement for linear park.
3.6	Greenhills	Merge and amend the 'Land Use/Urban Functions' and 'Land Use Mix' for Greenhills in Section 3.6 of the Draft LAP as follows:  <i>Predominantly business, enterprise and employment area with higher value commercial, industry and distribution and potential for limited mixed uses along Greenhills Road, proximate to Airton Road, where it can integrate effectively with existing and established uses</i>
3.7	Technological University Dublin / Tallaght Campus	Amend the boundaries of the TUD-TC and Village neighbourhood to include the Priory lands zoned for 'VC – Village Centre' in the Village.
3.7	Technological University Dublin / Tallaght Campus	Modify Section 3.4 and 3.7 to acknowledge inclusion of the Priory and associated uses.
3.7	Technological University Dublin / Tallaght Campus	Amend/add the following key objective in Section 3.7 of the Draft LAP as follows:  <del><i>Protect the character and integrity of The Priory.</i></del>

		<p><i>Protect the parkland setting and provide for greater public access and usage.</i></p> <p><i>Protect and preserve Heronry located on Priory lands and extending into TUD lands.</i></p>
3.8	Whitestown	<p>Merge and amend the 'Land Use/Urban Functions' and 'Land Use Mix' for Whitestown in Section 3.8 of the Draft LAP as follows:</p> <p><i>Commercial services and employment hub in close proximity to The Centre.</i></p>
3.8	Whitestown	<p>Add following requirement:</p> <p><i>Prior to any works being carried out to open up the Whitestown Stream as a cycling / pedestrian corridor, an Ecological Impact Assessment of proposals should be undertaken, which should include detailed ecological surveys of the Whitestown section of the Whitestown Stream.</i></p>
Chapter 4	Economic Development and Tourism	<p>Add text to Section 4.1 Introduction</p> <p><i>The significant assets of the historic village of Tallaght coupled with its location at the foot of the Dublin Mountains has contributed to Tallaght's emergence in recent years as a tourism centre and growing hospitality services centre. Tallaght's growing function as a centre for sustainable energy innovation through its designation by SEI as a Sustainable Energy Community contributes to future tourism potential in the area.</i></p>
Chapter 4	Economic Development and Tourism	<p>Add text to Section 4.2</p> <p><i>Tallaght is a regionally important centre of economic activity, innovation, public services, sport and tourism. There is a substantial and varied employment base in the area. Preliminary findings of an employment survey for the area have revealed that worker density (workers per sqm floorspace) employment levels in office and retail uses across the various neighbourhoods in terms of workers per sqm floorspace are generally in accordance with the recommended guidance for the office services and the densities for retail services is higher (as per UK guidance HCA Employment Density Guidance 3rd Edition (2015)). Industrial uses across the LAP lands are generally significantly lower than recommended guidance, reflecting a high rate of floorspace with comparatively low numbers of workers. This is not considered to be an efficient use of building space in this highly populated, well-connected urban location with substantial civic, educational and economic strengths. There is significant potential through the gradual regeneration of existing brownfield lands to further the status of Tallaght as the County Town and a regionally important centre of economic activity, innovation and public services.</i></p>
Chapter 4	Economic Development and Tourism	<p>Add policy objective to Section 4.2.</p> <p><i>It is the policy of the Council to continue to support Tallaght's role as a centre of Education and Innovation and to continue to</i></p>

		<i>support and promote the activities of Tallaght Hospital, TUD, the Training Centre, existing businesses and enterprises, and related use, as leaders in Education and Innovation.</i>
Chapter 4	Economic Development and Tourism	Add policy objective to Section 4.2  <i>It is the policy of the Council to support the provision of advanced Wifi service within the LAP lands.</i>
Chapter 4	Economic Development and Tourism	Amend and add text to Section 4.3  <i>In addition to the outdoor activities and sports elements, the additional elements needed to strengthen the Tallaght cluster and achieve it's standing as a principal gateway, as identified in the South Dublin Tourism Strategy are</i>  <i>Heritage Trail</i> <i>Landing Point</i>  <i>Visitor Centre</i>
5.3 and 8.4.1	Community Facilities (Schools)	Amend text to provide for the reservation of 3no. primary schools within, or immediately adjoining, the LAP lands. Further clarification and priority to be provided upon review of County Development Plan following ongoing assessment of residential development in the area.
5.2.1	Housing Mix	Amend Section 5.2.1 as follows:  <del><i>Assuming continued growth in the number and size of families in the area based on recent trends, the young population and the predominance of pre to early stage families, the following policy is proposed in order to accommodate the envisaged growth in families of 4 or more persons in the area:</i></del>  <del><i>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</i></del>  Replaced with the following:  <i>It is policy of the Council to ensure an appropriate housing mix is provided within the LAP lands, which responds to demographic demands of the area in terms of a balanced provision of housing sizes. In this regard, residential development proposals shall state the proposed dwelling size mix and provide justification for the range of dwellings to be provided having regard to the needs of the area, demographic trends in the area and viability.</i>  <i>This provision will be reviewed pending the completion of a Housing Need and Demand Assessment (HNDA) for the Dublin area.</i>  <i>The Planning Authority will closely monitor developments in the LAP area and will seek to avoid an over proliferation of dwelling types or sizes which do not adequately serve the needs of a varied population. In the absence of preparation of the Housing Need Demand Assessment, where it is clear that a monotonous form of housing tenures or sizes is becoming apparent in the</i>

		<p><i>area, the Planning Authority will require development proposals to address shortfalls in housing need.</i></p>
5.2.2	Housing Mix	<p>Amend Section 5.2.2 as follows:</p> <p><del><i>It is therefore policy of the Council that the following housing/occupancy mix for residential development be applied across the LAP on a site by site basis, to be demonstrated at planning application stage:</i></del></p> <ul style="list-style-type: none"> <li><del>• <i>A minimum of 30% of dwelling units for owner occupation/ private sale</i></del></li> <li><del>• <i>A maximum of 60% of dwelling units for Build to Rent</i></del></li> <li><del>• <i>A minimum of 10% of dwelling units for social housing (Part V)</i></del></li> </ul> <p><del><i>These requirements may be transferred between sites within the same neighbourhood area subject to a clear justification for not meeting the requirement on an individual site and subject to the overall balance specified above being achieved in the neighbourhood area. Any transfer of this mix requirement will only be considered where supported by a clear demonstration at planning application stage of how the mix will be achieved across multiple sites and a statutory declaration from the owners of these sites committing to the delivery of the housing occupancy mix on their lands.</i></del></p> <p><del><i>Where permission is granted for a residential development, the applicant will be required to lodge with the Land Registry a burden on the properties identified as for owner occupation/ private sale, in the form of a Section 47 agreement, restricting these dwelling for a period of 7 years to owner occupation/ private sale, unless otherwise agreed in writing with the Planning Authority.</i></del></p> <p><del><i>On sites where a developer demonstrates that 30% private sale / owner occupation units cannot be achieved based on assessment against Plan criteria including viability considerations, an alternative scenario may be considered. However, provision of more than 60% BTR must be accompanied by evidence that the level of BTR provided is justified. Proposals for student accommodation will be considered in the context of the proximity of the teaching hospital at Tallaght and TUD.</i></del></p> <p>Replaced with the following:</p> <p><i>In the interest of providing an appropriate housing tenure mix it is policy of the Council that all residential development proposals shall state the proposed tenure mix and provide justification for the proposed mix having regard to the socio economic and demographic context of the area. It is an ambition of the LAP to encourage the provision of at least 30% owner occupied units across the LAP area.</i></p>

		<i>This provision will be reviewed pending the completion of a Housing Need and Demand Assessment (HNDA) for the Dublin area.</i>
5.2.2	Housing Mix	<p>Add text to Section 5.2.2 as follows:</p> <p><b>Affordable Housing</b></p> <p><i>South Dublin County Council has launched a scheme of Affordable Housing aimed at those who do not qualify for social housing supports, but struggle to purchase or rent their own home on the market. The Council therefore supports residential development proposals which provides for the accommodation needs of those who have a specific need for affordable housing and have registered with the South Dublin County Council Affordable Housing Scheme.</i></p> <p><i>It is policy of the Council to support the provision of Affordable Housing in the area. In this regard, the Council encourages residential development proposals which address the needs of those who have registered with South Dublin County Council's affordable housing scheme. Flexibility with regard to the housing tenure and typology mix will be considered where it is demonstrated that 50% or more of the dwellings in a residential development are provided for Affordable Housing, as defined by the Council.</i></p> <p><b>Elderly Housing and Care</b></p> <p><i>It is an objective of the LAP to facilitate the delivery of elderly housing accommodation, stepped down care accommodation and other forms of assisted living accommodation which can benefit from close proximity to existing services and facilities.</i></p> <p><i>It is an objective of the LAP to encourage and facilitate the delivery of Lifetime Adaptable Housing.</i></p>
Chapter 6	Heritage and Conservation	Add text which summarises the findings of the SEA/AA to this chapter.
Chapter 6	Heritage and Conservation	<p>Add following text relating to new development within the ACA.</p> <p><i>Any proposals for development within the Architectural Conservation Area (ACA) shall include a design rationale addressing the impact of the proposed development on the ACA, including how the proposal will integrate with the historic environment.</i></p>
Chapter 6	Heritage and Conservation	<p>Amend paragraph 2 of Section 6.2 to read as follows:</p> <p><i>There are a number of Protected Structures and Recorded Monuments in Tallaght which are included in the Record of Monuments and Places RMP and listed also in the Record of Protected Structures.</i></p>
Chapter 6	Heritage and Conservation	<p>Amend text in section 6.3 to read as follows:</p> <p><i>Features/deposits preserved in-situ shall be accompanied by appropriate and sensitive explanatory signage.</i></p>

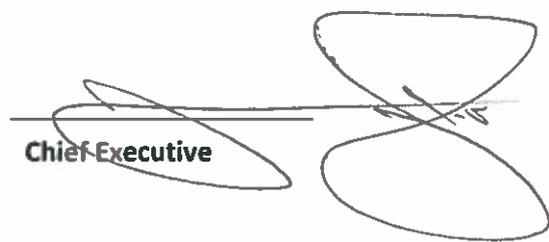
Chapter 6 and 3.4	Heritage and Conservation	Add the following text to section 6.2: <i>Any proposals for the future development of the Priory or St Maelruan's shall be accompanied by a detailed Conservation plan which will assess the impact of any development and how it will contribute to the conservation of historically significant structures and landscape elements.</i>
Chapter 7	Climate Change and Adaptation	Add objective re: the protection of existing biodiversity and the regulation of activities/development in key wildlife areas.
Chapter 7 and 3.8	Climate Change and Adaptation	Add following requirement: <i>Prior to any works being carried out to open up the Whitestown Stream as a cycling / pedestrian corridor, an Ecological Impact Assessment of proposals should be undertaken, which should include detailed ecological surveys of the Whitestown section of the Whitestown Stream.</i>
Chapter 7	Climate Change and Adaptation	Add objective requiring protection and preservation of Heronry located on Priory lands and extending into TUD lands.
Chapter 7	Climate Change and Adaptation	Add objective re rehabilitation of lands to south west of Sean Walsh Park adjoining existing ponds.
Chapter 7	Climate Change and Adaptation	Add text: <i>where sector specific (DoES, HSE etc.) climate change mitigation and adaptation targets are established these shall be applied within the LAP area.</i>
Chapter 7	Climate Change and Adaptation	Add text to Sections 7.43, 7.4.4, 7.4.5 and 7.4.6 of the Plan to reflect the current position in regard to Climate Change policy as they pertain to the Plan, including South Dublin County Council Climate Change Action Plan. The changes primarily relate to an update of the District heating policy to reflect current proposals in Tallaght including operation, DH ready provisions, and provision of service. Updates to reflect changes in national policy around Part L of the building regs and some minor comments/ changes are also recommended.
Chapter 8 and 3.2-3.9	Implementation and Sequencing	For clarity phasing requirements for each neighbourhood to be incorporated into relevant neighbourhood. Overall approach as set out in Chapter 8, detail of tables for each neighbourhood to be either duplicated or cross referenced between chapters 3 and 8 cross referenced with Neighbourhood Guidance.
Chapter 8	Implementation and Sequencing	Phasing table to be amended with addition of two columns: Scheduling and Delivery Responsibility and Funding. Amendments also to table to clarify approach to be taken in relation to water and sewerage, power, gas etc. This also addresses issues raised in relation to SDCC involvement/ use of state land/ funding streams etc.
Chapter 8	Implementation and Sequencing	Amend wording in Section 8.4.1 as follows:

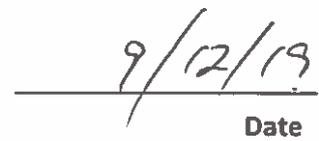
		<p>At this stage it is anticipated that <del>2</del> 3 primary schools and a secondary school will be required within or in very close proximity to the plan area. The plan identifies a potential location for <del>the first primary school and</del> the secondary school. A site for the <del>second</del> primary schools has not yet been identified. <del>It is intended that</del> South Dublin County Council will maintain a strong working relationship with the Department regarding the provision of schools within the plan area. The plan does identify a set of SDCC objectives for locating the primary schools, however, this will need to be actively assessed and monitored within the plan area once permissions have been granted for c. <del>16800–21,000</del> units.</p>
Chapter 8	Implementation and Sequencing	<p>Amend wording for ‘neighbourhood/sub neighbourhood requirements’ to reflect clarifications recommended within this Report relating to community, transport interchange and Poddle, as follows:</p> <p><i>1 no. new community space required per 5,000 population growth (c.2,000 units) in the Centre or Cookstown neighbourhoods. The <del>Planning Authority will actively engage with the Community Section of South Dublin County Council to ensure sufficient community facilities are planned for demand for, and delivery of, this facility will be assessed once 1,500 units have been permitted in the Centre and Cookstown neighbourhoods.</del></i></p> <p><del>Bus Connects</del> Transport Hub and Interchange <i>within area <del>land take as</del> identified in the Urban Design Framework for this plan or as otherwise agreed with the Lead Agencies.</i></p> <p><i>Explore the feasibility of uplifting the <del>Uplift of</del> River Poddle and incorporating into public realm, open space and green/blue infrastructure asset strategies as part of proposals for development.</i></p> <p><i>Belgard Square North Link Road and Airton Road Extension prior to, or in tandem with, <del>adjacent new</del> development.</i></p>
Various	Urban Squares	Update wording for consistency to refer to ‘Belgard Urban Square’ and ‘Cookstown Urban Square’ as urban square or plaza throughout the Plan.
Various	Library Square	Update reference to Chamber Square to read as Library Square throughout Plan.
Chapter 8	Implementation and Sequencing	Amend text in phasing tables in Chapter 8 in relation to pocket parks and urban squares removing details of dimensions of parks. All housing and beds pace quantum associated with the delivery of pocket parks will be updated and amended, where necessary.
Appendix 3	Social Infrastructure Audit	Update text to reflect any impact of detailed amendments throughout the Plan.

Appendix 3	Social Infrastructure Audit	Clarify quantity of open space required in the area and the quantity provided based on function and usability of open spaces.
Appendix 4	Strategic Flood Risk Assessment	The SFRA will be amended to reflect updates to policy, data on flood risk and otherwise since preparation of SFRA.
Appendix 5	Strategic Environmental Assessment	The SEA will be amended to reflect updates to policy and otherwise since preparation of SEA and to incorporate comments of EPA, including to codify objectives of LAP.

## 9.0 CONCLUSION

Taking account of the proper planning and sustainable development of the area, it is recommended that the proposed amendments to the Draft Local Area Plan for Tallaght Town Centre be made in accordance with the recommendations of this report.

  
Chief Executive

  
Date



# NOTICE OF PUBLIC CONSULTATION FOR PROPOSED DRAFT TALLAGHT TOWN CENTRE LOCAL AREA PLAN Planning and Development Act, 2000 (as amended) Consultation under Section 20 (1) of the Planning & Development Act 2000 (as amended)

Notice is hereby given, pursuant to Section 20(1) of the Planning and Development Act, 2000 (as amended) that South Dublin County Council, being the Planning Authority for the County has prepared a proposed Draft Tallaght Town Centre Local Area Plan.

An Environmental Report has been prepared as part of a Strategic Environmental Assessment of the proposed Draft Local Area Plan. The proposed Draft Local Area Plan has undergone Appropriate Assessment Screening under the Habitats Directive (92/43/EEC).

## Information

The Draft Local Area Plan will be available for inspection for a period from **Thursday 12th September 2019 until Thursday 24th October 2019 inclusive**. A leaflet and information can be viewed on the Councils website at <http://consult.sdublincoco.ie>.

The proposed Draft Local Area Plan and Environmental Report can be viewed on the Council's website at [www.southdublin.ie](http://www.southdublin.ie) and can also be viewed at County Library and County Hall, Tallaght during normal opening hours (excluding public holidays). Council staff will be available to answer queries at the County Library, Tallaght at the following times:

**Monday 23rd September 1:00 - 4:00pm**

**Tuesday 1st October 4:00 - 7:30pm**

**Thursday 10th October 1:00 - 4:00pm**

**Tuesday 15th October 4:00 - 7:30pm**

Council staff will also be available to answer general queries on the proposed Draft Local Area Plan on **Wednesdays between 11-1pm during the public consultation period** in the Foyer, Tallaght Council Offices, County Hall, during the public consultation. If you have further questions on the proposed Local Area Plan please call 01 - 414 9000 or email [cccounter@sdublincoco.ie](mailto:cccounter@sdublincoco.ie)

## Submissions

Submissions and observations on the proposed Draft Local Area Plan and the Environmental Report should be made in ONE medium only to South Dublin County Council until **4.00pm on Thursday 24th October 2019** for postal submissions or as outlined at the following addresses:

**Online:** <http://consult.sdublincoco.ie> (up to 12.00 midnight on the 24th of October 2019).

**By Post:** Senior Executive Officer, Forward Planning Section, Land Use Planning and Transportation Department, South Dublin County Council, County Hall, Tallaght, Dublin 24.

Submissions or observations cannot be accepted in any other format or to any other online or postal address. Submissions and observations should state the name, address, and where relevant, the body represented. Children, or groups of associations representing the interests of children, are entitled to make submissions or observations. All submissions and observations that are received up to 4.00pm on Thursday 24th October 2019 and that are addressed correctly and in the prescribed format will be taken into consideration before the making of the Draft Local Area Plan and its Environmental Report.

In accordance with Section 13(3A) a of the Planning and Development Act 2000, as amended, written submissions or observations received by a Planning Authority under this section shall be published on the website of the authority within 10 working days of its receipt by that authority.

**Michael Mulhern, Director of Services**  
**Land Use Planning and Transportation Department**

**Web:** [www.southdublin.ie](http://www.southdublin.ie)

