



THORNTON O'CONNOR
TOWN PLANNING

Planning Report and Statement of Consistency

Prepared in Respect of a Proposed Mixed-Use
Development that Constitutes a Large-Scale
Residential Development at Whitestown Way,
Tallaght, Dublin 24

On Behalf of ARP 4.2 Sustainable Communities
(Ireland) Fund

May 2026

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

Tuesday, 26th May 2026

To whom it may concern,

RE: PLANNING REPORT AND STATEMENT OF CONSISTENCY PREPARED IN RESPECT OF A PROPOSED MIXED-USE DEVELOPMENT THAT CONSTITUTES A LARGE-SCALE RESIDENTIAL DEVELOPMENT AT WHITESTOWN WAY, TALLAGHT, DUBLIN 24

1.0 INTRODUCTION

Thornton O'Connor Town Planning¹ (TOC), in association with Reddy Architecture & Urbanism² (RAU), DBFL Consulting Engineers³ (DBFL), Fallon Design⁴, Mitchell + Associates⁵, CMK Urban Forestry Consultants⁶, O'Connor Sutton Cronin⁷, 3D Design Bureau⁸, Wave Dynamics⁹, AWN Consulting¹⁰, ISM¹¹, Lawler Sustainability¹², Straten CSL¹³ and IAC¹⁴, has been retained by 'ARP 4.2 Sustainable Communities (Ireland) Fund'¹⁵ (the 'Applicant', which is a sub-fund of Ardstone Partners ICAV) to submit this Planning Application for a mixed-use development that constitutes a 'Large-Scale Residential Development' (LRD) to South Dublin County Council (SDCC).

The Application relates to a development comprising 169 No. apartment units, 2 No. class 1 / class 2 commercial units and a crèche, proposed in 2 No. 6-storey blocks connected by a single-storey undercroft/podium level at Whitestown Way, Tallaght, Dublin 24.

¹ No. 1 Kilmacud Road Upper, Dundrum, Dublin 14

² Dartry Mills, Dartry Road, Dublin 6

³ Ormond House, Ormond Quay Upper, Dublin 7

⁴ Avocet House, Riverwalk, Arklow, Co. Wicklow

⁵ No. 5 Woodpark, The Rise, Glasnevin, Dublin 9

⁶ Drumone, Oldcastle Co. Meath

⁷ No. 9 Prussia Street, Stoneybatter, Dublin 7

⁸ Unit 7, George's Street Upper, Dún Laoghaire, Co. Dublin

⁹ Unit 14, Ramstown, Gorey Business Park, Co. Wexford

¹⁰ The Tecpro Building, Clonshaugh Business & Technology Park, Dublin 17

¹¹ No. 77 Camden Street, Dublin 2

¹² Nos. 50-56 Merrion Road, Dublin 4

¹³ Ellerd House, Amenbury Lane, Harpenden, Hertfordshire, England, AL5 2EJ

¹⁴ Unit G1, Kilcoole Road, Network Enterprise Park, Co. Wicklow

¹⁵ Riverside One, Sir John Rogerson's Quay, Dublin 2

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

"large-scale residential development" means a development that includes—

- (a) the development of 100 or more houses,*
- (b) the development of student accommodation that includes 200 or more bed spaces,*
- (c) both the development of 100 or more houses and of student accommodation, or*
- (d) both the development of student accommodation that includes 200 or more bed spaces and of houses,*

where the LRD floor space of—

- (i) in the case of paragraph (a), the buildings comprising the houses,*
- (ii) in the case of paragraph (b), the student accommodation,*
- (iii) in the case of paragraphs (c) and (d), the buildings comprising the houses and the student accommodation,*

is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development;"

As the proposed development includes 169 No. residential units and 'non-residential' floorspace not exceeding 30% of the floor area, it is considered to be an LRD Application and must proceed through the corresponding planning route.

1.1 Preceding Consultation

As required by the relevant LRD legislation, this Planning Application has been preceded by Section 247 Pre-Planning Consultation (PPC) and Section 32C LRD Meeting (LRDM) Consultation with SDCC.

The PPC meetings were as follows:

- 1) Pre-Planning Ref. No. LRDPP010/25, held on 9th October 2025.
- 2) Pre-Planning Ref. No. LRDPP014/25, held on 25th November 2025.

The LRDM (Ref. No. LRDOP001/26) was held on 18th March 2026 and the *LRD Opinion* was received on 17th April 2026. Attendees to the LRDM were:

Applicant and Design Team Attendees:

- Mark Forrest – Applicant
- Adam Dunne – Applicant
- Emma Harrington – KSNPM
- Brian McCaffrey – KSNPM
- Daniel Moody – Thornton O'Connor Town Planning
- Patricia Thornton – Thornton O'Connor Town Planning
- Lisa Wynne – RAU

- Peter Carroll – RAU
- Noel Gorman – DBFL
- Maria Doyle – DBFL
- William Burke – Mitchell + Associates

SDCC Attendees:

- Darren Fagan
- Colm Maguire
- Will Byrne
- Tony Mangan
- Hannah Johnson
- Debbie O’Dempsey
- Brian Harkin

1.2 Summary of the Proposed Development

The proposed development principally comprises the construction of a mixed-use development in 2 No. blocks (A to the east and B to the west) ranging in height from 1 No. storey (undercroft/podium) to 6 No. storeys. The development includes: 169 No. residential units (80 No. 1-bed, 85 No. 2-bed and 4 No. 3-bed); 2 No. class 1 / class 2 commercial units (totalling 356.5 sq m); and a crèche (162.8 sq m) with external play area.

1.3 Submitted Planning Application Documents

Please refer to the enclosed cover letter which includes a full list of the documents submitted as part of the Planning Application pack.

Note that proof of payment of the planning fee is provided in Appendix A below.

1.4 Purpose and Structure of this Report

The purpose of this *Planning Report and Statement of Consistency* (Planning Report, from hereon) is to introduce the subject site’s location and history, to summarise the details of the proposed development and to demonstrate how it accords with key policies and the principles of proper planning and sustainable development.

The report continues with the following structure:

Section 2 – Site Location, Description, Context and Accessibility

Section 3 – Planning History

Section 4 – Development Description

Section 5 – Strategic Planning Policy Context

Section 6 – Planning Policy Overview and Assessment

Section 7 – Conclusion

2.0 SITE LOCATION, DESCRIPTION, CONTEXT AND ACCESSIBILITY

The following section provides an overview of the subject site’s description, location and broader context. It also proceeds to consider its accessibility, with a priority on sustainable modes of active and public transport.

2.1 Site Location and Description

Located at Whitestown Way, Tallaght, Dublin 24, the subject site is principally greenfield in nature and totals 1.32 Ha in area. The site, which includes a section of Whitestown Road (north) and Whitestown Way (east), is predominantly scrubland and is infill in nature.

It is generally bound by: the Vita Actives Warehouse and The Arena Centre to the north; Riverside Business Park to the south; Whitestown Way to the east; and the Vita Actives Warehouse and Hadi Motors to the west. The site lies south of the N81 National Secondary Road and The Arena Centre and south-west of The Square Shopping Centre. It additionally lies immediately south-west of Tallaght Stadium and west of its ancillary car park.

In terms of general connectivity and accessibility, the site (at its closest) is located within a 600-metre / 9-minute walk of Tallaght Luas Stop and a 500-metre / 7-minute walk of The Square Shopping Centre. It is additionally within a 600-metre / 8-minute walk of Sean Walsh Memorial Park and a 1.3-kilometre / 18-minute walk of the Technological University Dublin Tallaght Campus. Furthermore, Tymon Park is located within a 3.9-kilometre / 15-minute cycle from the subject site.

The location and character of the subject site is shown below in Figures 2.1–2.4.



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

(Source: www.myplan.ie, Annotated By Thornton O’Connor Town Planning, 2026)



Figure 2.2: Aerial View with the Indicative Boundary of the Subject Site Outlined in Red

(Source: Google Earth, Annotated By Thornton O'Connor Town Planning, 2026)



Figure 2.3: View of the Subject Site – Looking South-West Towards the Site on Whitestown Way

(Source: Google Maps Street View (September 2024), Annotated By Thornton O'Connor Town Planning, 2026)



Figure 2.4: View of the Subject Site – Looking North-West Towards the Site on Whitestown Way with The Arena Centre in the Background

(Source: Google Maps Street View (September 2024), Annotated By Thornton O'Connor Town Planning, 2026)

2.2 Site Context

The immediate environs of the subject site are characterised by a mix of land-uses, including, but not limited to:

- The Arena Centre, a mixed-use development comprising ground floor retail (including Lidl), office accommodation, approximately 230 No. apartments and the Maldron Hotel¹⁶, to the immediate north.
- Tallaght Stadium to the north-east, on the opposite side of Whitestown Way.
- The Weir, an older person's residential development comprising 81 No. units¹⁷, to the east, on the opposite side of Whitestown Way.
- Warehouse and industrial units to the immediate south and west.

The wider environs are similarly characterised by a diverse mix of land-uses. These include The Square Shopping Centre (a commercial development comprising approximately 144 No. stores, 32 No. eateries and a cinema¹⁸), Tallaght University Hospital, and a range of established residential developments. The character of the area is illustrated below in Figure 2.5.

¹⁶ www.thearenacentre.ie

¹⁷ www.clannhousing.ie/our-scheme/the-weir/

¹⁸ www.thesquare.ie



Figure 2.5: Aerial View of the Subject Site (Indicative Location Denoted By Red Star) and Environs

(Source: Google Earth, Annotated By Thornton O'Connor Town Planning, 2026)

2.3 Site Accessibility

2.3.1 Public Transport: Rail Services

Tallaght Luas Stop is located a 9-minute / 600-metre walking distance or a 3-minute / 650-metre cycling distance from the north-eastern corner of the subject site. The Red Line Luas provides frequent and easy access to a series of locations throughout the City Centre, east and west Dublin City and west County Dublin. The Red Cow Interchange, a stop on the Red Line Luas, functions as a transport node and is served by numerous bus routes offering connectivity to a wide range of destinations within Dublin and beyond.

Furthermore, Heuston Station, which is also served by the Red Line Luas, provides national rail connectivity via a number of intercity routes, including:

- Dublin Heuston – Cork,
- Dublin Heuston – Galway,
- Dublin Heuston – Limerick and Ennis,
- Dublin Heuston – Limerick (via Nenagh),
- Dublin Heuston – Waterford,
- Dublin Heuston – Westport and Ballina, and

- Dublin Heuston – Portlaoise¹⁹.

In addition, there is the opportunity for users to change onto the Green Line Luas at Abbey Street which provides access to multiple locations to the north of Dublin City Centre towards Broombridge and to the south of Dublin City Centre towards Sandyford and Brides Glen.

The proximity of the subject site to the Tallaght Luas Stop and the associated regular, high-frequency tram services accounts for excellent public transport accessibility to/from the subject site. It also demonstrates the highly accessible location of the subject site and its suitability for a high-density residential-led, mixed-use development. The proposal for such a scheme at the subject site also supports and aligns with the principles underpinning the '15-minute City' model for public transport and sustainable development in urban areas supported heavily by policy implementation and objectives within the *South Dublin County Development Plan 2022–2028*.



Figure 2.6: The Tallaght Luas Stop on the Red Line with Higher Density Residential Development Known as Cross West and HSE Office Building Shown in the Background

(Source: www.flickr.com)

2.3.2 Public Transport: Bus Services

In addition to the proximate Tallaght Luas Stop, some 14 No. bus routes serve the subject site via the nearby Whitestown Way, and Old Blessington Road and Belgard Square West (across the N81). These are listed in Table 2.1 below and include the highly frequent (at peak time) Routes Nos. 27, 65B, 77A, S6 and S8.

¹⁹ www.irishrail.ie/en-ie/station/dublin-heuston

Route No.	Provider	Destination	Weekday Frequency	Peak
27	Dublin Bus	Jobstown – Clare Hall	10 minutes	
56A	Dublin Bus	The Square – Ringsend Road	60 minutes	
65	Dublin Bus	Blessington / Ballymore – Poolbeg Street	35 minutes	
65A	Dublin Bus	The Square – Blessington	1 – 2 No. times daily ²⁰	
65B	Dublin Bus	Citywest – Poolbeg Street	10 minutes	
77A	Dublin Bus	Citywest – Ringsend Road	10 minutes	
77X	Dublin Bus	Citywest – UCD Belfield	1 No. daily	
82	Dublin Bus	Kiltipper – Irishtown	20 minutes	
F1	Dublin Bus	The Square – IKEA	15 minutes	
S6	Go-Ahead	The Square – Blackrock Station	8 minutes	
S8	Go-Ahead	Kingswood Avenue – Dún Laoghaire Station	10 minutes	
W2	Go-Ahead	The Square – Liffey Valley Shopping Centre	15 minutes	
W4	Go-Ahead	The Square – Blanchardstown Shopping Centre	15 minutes	
W6	Go-Ahead	The Square – Maynooth	25 minutes	

Table 2.1: Existing Bus Services Serving the Subject Site

(Source: www.dublinbus.ie and www.goaheadireland.ie)

Under BusConnects, which is a national programme for investment in the bus network in cities across Ireland, the bus network is being redesigned, and a more legible and accessible transport network created. A key principle underpinning this network is the notion of “Abundant Access” which is the idea that through simple connections and transfers between public transport services, more of the city should be accessible to passengers within a reasonable travel time.

A Spine Route (F1), a number of Orbital Routes (W2, W4, W6, S6 and S8) and a Radial Route (82) have already been implemented (detailed above) as part of BusConnects. Two additional Spine Routes (D2 and D4), two additional Radial Routes (71 and 85), a Local Route (L44) and a Peak-Only / Express Route (X47) are proposed to serve the area. The proposed network in the vicinity of the subject site, which will enhance connectivity with the surrounding area and beyond, is shown below in Figure 2.6.

²⁰ Frequency is dependent on the direction of travel. 90 minutes between 2 No. daily services.

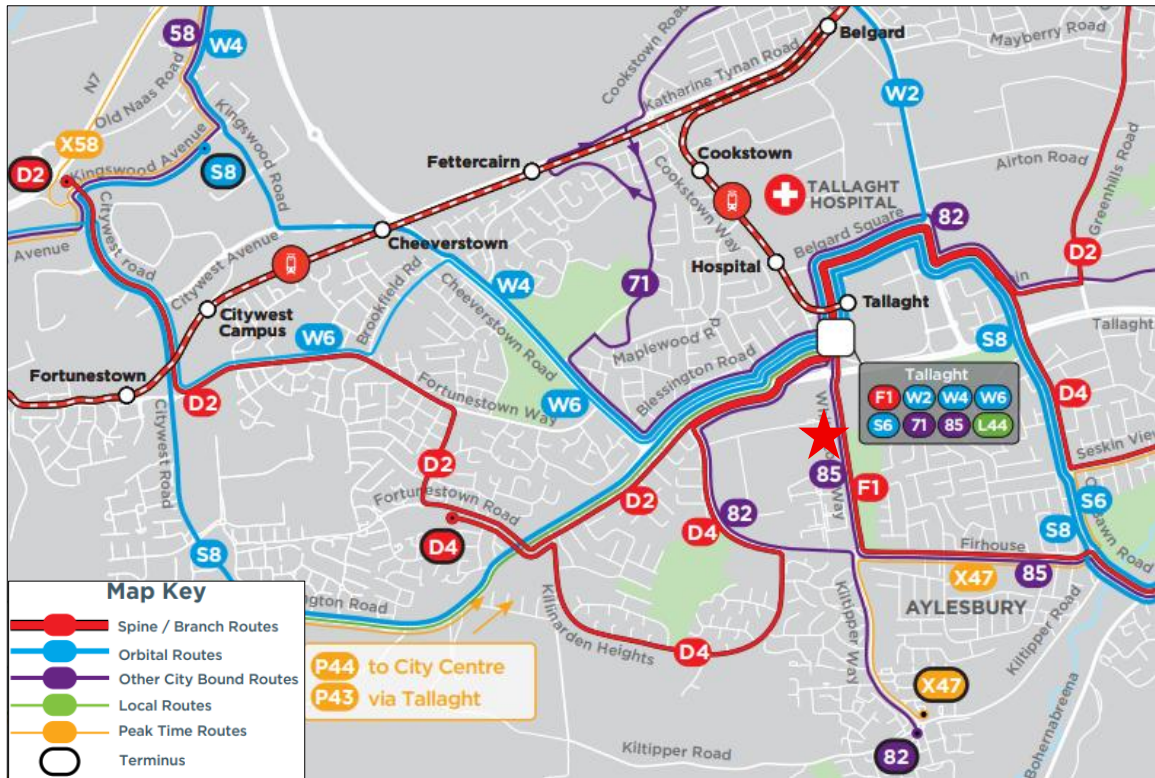


Figure 2.7: BusConnects Network in the Vicinity of the Subject Site (Indicative Location Denoted By Red Star)

(Source: www.busconnects.ie, Annotated By Thornton O'Connor Town Planning, 2026)

As can be seen in Figure 2.7 above and Table 2.2 below, the following proposed bus routes are particularly relevant to the subject site (Nos. F1, W2, W4, W6, S6, S8 and 82 have been omitted from Table 2.2 as they have been implemented since the publication of Figure 2.7).

Proposed Bus Routes			
Bus Route	Destination	Weekday Frequency	Peak
Spine Routes			
Route No. D2	Clare Hall – City Centre – Citywest	12 minutes	
Route No. D4	Swords Road – City Centre – Castletymon – Killinarden	12 minutes	
Radial Routes			
Route No. 71	Tallaght – Ballymount – Warrenmount – East Wall	20 minutes	
Route No. 85	Tallaght – Ballyboden – Harold’s Cross – Parnell Square	8 minutes	
Local Routes			
Route No. L44	Ballymore Eustace – Blessington – Tallaght	30 minutes	
Peak-Only / Express Routes			
Route No. X47	Kiltipper – Seskin View – Tymon North – City Centre	1 No. daily (Replacing Dublin Bus No. 77X)	

Table 2.2: Proposed BusConnects Routes in the Vicinity of the Subject Site

(Source: www.busconnects.ie)

2.3.3 Active Travel Infrastructure

The vicinity of the subject site, as shown below in Figure 2.8, benefits from a wealth of existing cycling infrastructure. For example, Whitestown Way, which adjoins and partially forms part of the subject site, comprises segregated cycle lanes on the side closest to the subject site, whilst the proximate Firhouse Road West and Tallaght Bypass (N81) also comprise cycle lanes. This provides coverage, range and comfort for cyclists.

Under the National Transport Authority's *Greater Dublin Area Cycle Network Plan*, it is proposed to enhance the cycle network in the Greater Dublin Area, with a range of cycle infrastructure proposed, including within the vicinity of the subject site, which will further bolster the cycling infrastructure already present. For example, a greenway is proposed to the south of the subject site, adjacent to Whitestown Stream. The existing and proposed cycle network in the vicinity of the subject lands is illustrated below in Figure 2.9.

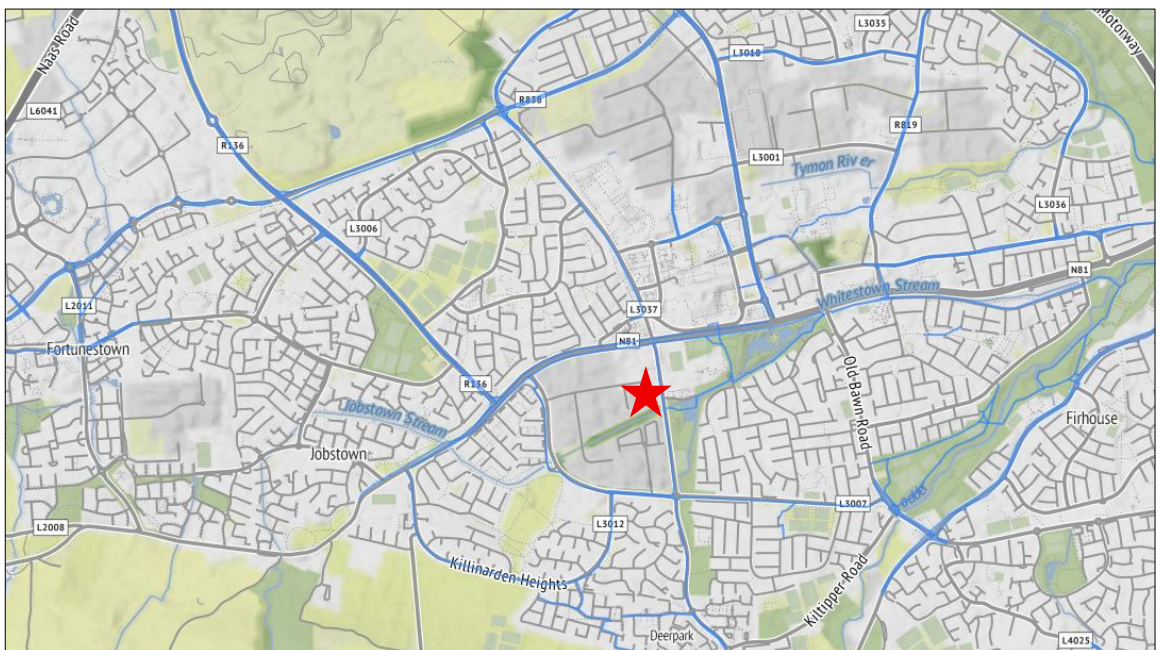


Figure 2.8: Existing Cycle Infrastructure Surrounding the Subject Site (Indicative Location Denoted By Red Star)

(Source: National Transport Authority (2025) *Dublin Metropolitan Area Cycle Infrastructure 2025*, Annotated By Thornton O'Connor Town Planning, 2026)

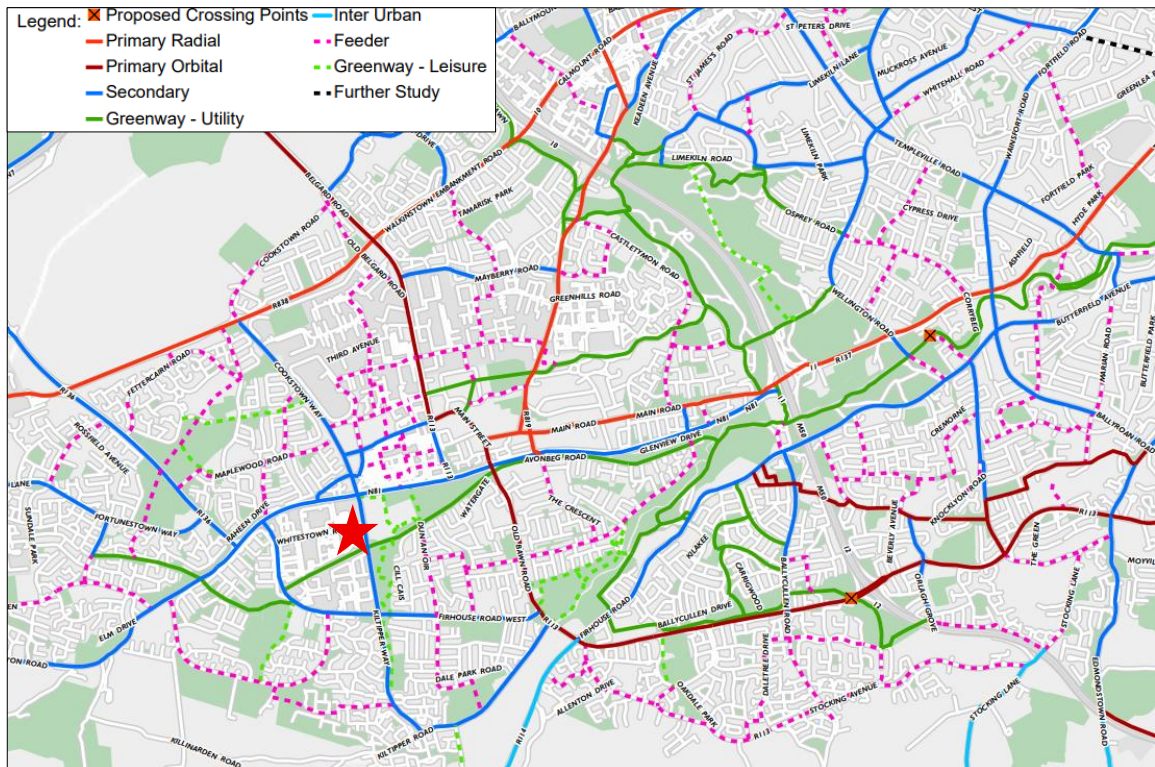


Figure 2.9: Existing and Proposed Cycle Infrastructure Surrounding the Subject Site (Indicative Location Denoted By Red Star)

(Source: National Transport Authority (2023) *2022 Greater Dublin Area Cycle Network Plan – Dublin South West Map, Annotated By Thornton O’Connor Town Planning, 2026*)

As detailed further in Section 2.3.4 below, the subject site is located within an eminently accessible area, with a wealth of pedestrian facilities providing convenient and safe access for future residents to access vital services and amenities within a short walking distance (Table 2.3). For example, Whitestown Way provides direct connections north to numerous services and facilities concentrated in and around the Arena Centre, The Square Shopping Centre and Belgard Square.

2.3.4 Services and Amenities Within Walking Distance of the Subject Site

As detailed in Table 2.3 below, the subject site benefits from a vast array of vital services and amenities, such as supermarket/grocery stores (in pink), schools (in blue), open space and recreational facilities (in green), childcare (in yellow) and healthcare facilities (in orange). In undertaking the exercise and compiling the list, a specific limitation of 15 minutes’ walking distance was applied, as this corresponds to the ‘15-minute city’ concept, espoused by planning policy and best practice.

Map No.	Service/Amenity	Walking Distance from Subject Site	Walking Time from Subject Site
1	The Square Shopping Centre ²¹	750 metres	11 minutes
2	Lidl (Whitestown Way)	160 metres	2 minutes
3	Polonez Tallaght Arena (Supermarket)	220 metres	3 minutes
4	Polonez Tallaght Belgard Square (Supermarket)	500 metres	8 minutes
5	Costless Supermarket	1 kilometre	13 minutes
6	Centra Springfield	1.1 kilometre	15 minutes
7	Centra Killinarden	1 kilometre	14 minutes
8	Mróz Tallaght (Grocery store)	550 metres	8 minutes
9	ALDI	750 metres	11 minutes
10	Spice Bazaar (Supermarket)	1 kilometre	14 minutes
11	VEG EXPRESS (Grocery store)	1 kilometre	13 minutes
12	Old Bawn Community School	950 metres	13 minutes
13	Once Upon a Time (Montessori)	230 metres	3 minutes
14	iSwim Academy - Club Vitae (swim club)	220 metres	3 minutes
15	Tigers Childcare Belgard Square	900 metres	13 minutes
16	Little Fairies Creche & Montessori	900 metres	13 minutes
17	St Martin De Porres National School	1.1 kilometres	15 minutes
18	Sacred Heart Senior National School	1.1 kilometres	15 minutes
19	SLOG Liffey Services (day care)	500 metres	7 minutes
20	Laugh & Learn (day care)	650 metres	9 minutes
21	GP's at Tallaght Cross	650 metres	10 minutes
22	Affidea Ireland	850 metres	12 minutes
23	Lucena Clinic Tallaght	1 kilometre	14 minutes
24	Tallaght Hospital	1.1 kilometre	15 minutes
25	Sean Walsh Memorial Park	1 kilometre	13 minutes
26	Vault Health Club Tallaght	500 metres	8 minutes
27	FLYEfit Tallaght	750 metres	11 minutes

Table 2.3: Services and Amenities Within a 15-Minute Walk from the Subject Site

(Source: Collated by Thornton O'Connor Town Planning, 2026)

Figure 2.9 below corresponds to the numbering in Table 2.3 and illustrates the location of the various services and amenities that serve the subject site, all accessible within a 15-minute walk.

²¹ As previously detailed, The Square Shopping Centre contains approximately 144 No. stores, 32 No. eateries and a cinema, including a Tesco, post office, Boots (pharmacy), Dunnes Stores, Eason (bookstore), EBS (bank), Hickey's Pharmacy, Holland & Barrett, Spar, Penneys and Square Dental (dental practice)

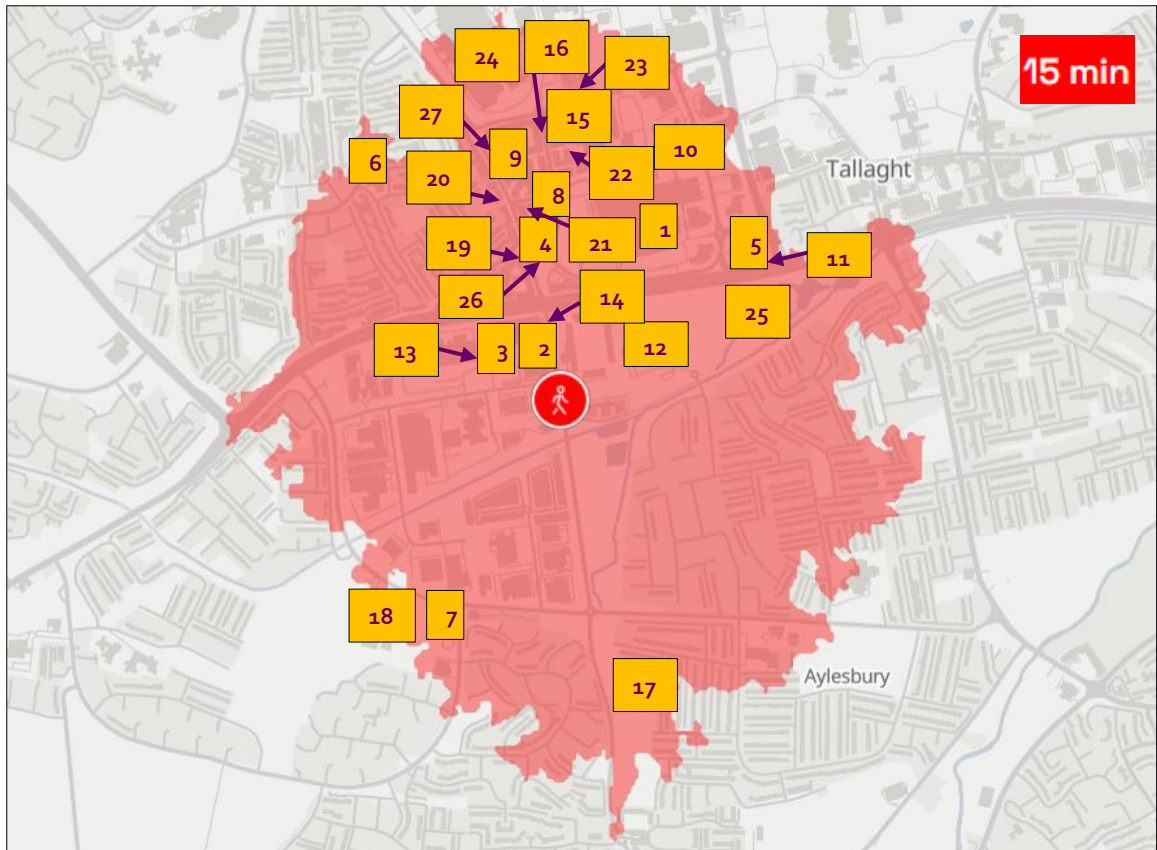


Figure 2.10: 15-Minute Walking Catchment from the Subject Site, Identified by the Red Pedestrian Icon (Map Nos. Correspond to Table 2.3)

(Source: app.traveltime.com, Annotated By Thornton O'Connor Town Planning, 2026)

Evidently, the subject site is well catered for by services and amenities that future residents would need to access on an almost daily basis. Positively, these locations can be accessed within a 15-minute walking distance, providing for basic requirements such as grocery shopping, educational needs, recreational spaces and health facilities.

3.0 PLANNING HISTORY

3.1 Subject Site

According to the Online Planning Application Database, there have been 2 No. Planning Applications made in respect of the subject site, or part thereof (SDCC Reg. Refs. SD14A/0128 and SD15A/0032). Under Reg. Ref. SD14A/0128, permission was sought for the retention of 2 No. advertising signs and was subsequently refused²². While under Reg. Ref. SD15A/0032, outline permission was sought and granted for the provision of a drive-through restaurant, petrol filling station and convenience store, details of which are provided below in Section 3.1.1.

3.1.1 SDCC Reg. Ref. SD15A/0032 – Outline Permission for a Drive-Through Restaurant, Petrol Station and Convenience Store

SDCC Reg. Ref.:	SD15A/0032
Location / Address:	Whitestown Road, Whitestown Industrial Estate, Tallaght, Dublin 24
Applicant:	Associated Rewinds (Ireland) Limited
Application Date:	11 th February 2015
Development Description:	Outline permission for the provision of a family drive-through restaurant, petrol station forecourt with car wash, air / water facilities and a convenience store. Works will also include: the creation of a vehicular entrance onto Whitestown Way Road; signage; internal access road; footpaths; green areas; public lighting; and associated site works.
SDCC Decision Date:	22 nd October 2015
SDCC Decision:	Grant Outline Permission
Final Grant Date:	30 th November 2015

In summary, the Planning Application principally sought outline permission for a drive-through restaurant, petrol station and convenience store on lands including part of the subject site (Figure 3.1). However, due to its age and proposed uses, it offers limited value in considering the content and characteristics of the subject development.

Notwithstanding the foregoing, one matter raised in the assessment by the Planning Authority related to the requirement to create a strong frontage along Whitestown Way at the edge of Tallaght Town Centre. The need for presence and a positive addition to the public realm was deemed to be important.

Addressing this issue was a crucial design consideration in the evolution of the subject development. With regard to how this has been achieved; a more assertive and robust building line has been proposed and sited, with a presence onto the primary frontage of Whitestown Way to the east. This is aided by the mix of uses (crèche and commercial) that will activate the frontage, bringing vibrancy to the streetscape. An attractive, and carefully considered landscape proposition also features, this comprises hard surfaces to facilitate movement and permeability and greenery to soften the environment, assist surface water management and support ecology and biodiversity.

²² This Planning Application is not discussed herein as it lacks relevance and was ultimately Refused Planning Permission.

In addition to the above, we note that as per the subject proposal, the primary access to the site in that proposal was via Whitestown Way (Figure 3.1) at approximately its mid-point, indicating its appropriateness.



Figure 3.1: Request for Further Information Proposed Site Plan

(Source: South Dublin County Council Planning Portal – Reg. Ref. SD15A/0032)

SDCC ultimately decided to Grant Outline Permission for the proposed development on 22nd October 2015, with a Final Grant issuing on 30th November 2015. No subsequent 'full' permission was ever sought and the site remains undeveloped.

3.2 Immediate and Wider Environs of the Subject Site

A search of the Online Planning Application Database revealed 2 No. Applications of note in the immediate and wider environs of the subject site – 1 No. made in respect of lands to the east of the subject site, on the opposite side of Whitestown Way (Reg. Ref. SD188/0008 refers), and 1 No. made in respect of lands at Belgard Square East (Reg. Ref. LRD25A/0009W refers). Details of which are provided below.

3.2.1 SDCC Reg. Ref. LRD25A/0009W – Large-Scale Residential Development on Lands at Belgard Square East

SDCC Reg. Ref.:	LRD25A/0009W
Location / Address:	A site of approximately 1.19 Ha at Belgard Square East, Belgard Road and Old Blessington Road, Tallaght, Dublin 24
Applicant:	Midsal Homes Limited
Application Date:	19 th November 2025
Development Description:	The proposed development principally comprises: the demolition and removal of existing boundary walls and railings on the main development site's eastern, western and northern sides; and the construction of a mixed-use development in 2 No. blocks (Block A to the south and Block B to the north) with a gross floor area of 23,540 sq m (including basement of 275 sq m) and ranging in height from 1 No. to 7 No. storeys (with mezzanine level) over basement. The development includes a total of 199 No. residential dwellings (6 No. studios, 47 No. 1-bed, 98 No. 2-bed and 48 No. 3-bed) in the 2 No. blocks, with Block A comprising 49 No. 'senior living' apartment units and Block B comprising 150 No. 'standard' apartment units. The development also includes 2,123 sq m of non-residential floor space, with the following uses proposed: 4 No. retail units (totalling 331 sq m); 4 No. class 1 / class 2 commercial units (totalling 387 sq m); a bicycle sales and repair shop (81 sq m); an off-licence (64 sq m); a bar (151 sq m); a café (87 sq m); a medical centre (210 sq m); a dental practice (72 sq m); a pharmacy (195 sq m); a beauty / health salon (195 sq m); and a crèche (350 sq m) with external play area. The development also comprises: an undercroft car park accessed via a new entrance / exit at Belgard Square East which provides 58 No. car parking spaces; a gated service lane to the south of Block A, with entrances / exits off Belgard Square East and Belgard Road; 2 No. pedestrian / cycle crossings, at Belgard Square East and Belgard Road; continuation of the northbound cycle lane from Belgard Road onto Old Blessington Road; alteration to the median and northbound right turn at Belgard Road onto Abberley Square; cycle parking; internal communal amenity spaces for the senior living units; hard and soft landscaping, including public open space, communal amenity space and incidental spaces; private amenity spaces (as balconies and terraces facing all directions); boundary treatments; 2 No. sub-stations; plant / operational rooms; bin stores; public lighting; blue roofs; rooftop PV arrays; lift overruns and rooftop opening vents atop both blocks; 4 No. 0.3 m diameter microwave link dishes mounted on 2 No. steel support poles affixed to the Block B lift overrun, all enclosed in radio-friendly GRP shrouds; and all associated works above and below ground.
SDCC Decision:	Grant Permission
SDCC Decision Date:	21 st January 2026
ACP Ref.:	324080
ACP Decision:	Pending
ACP Decision Due Date:	8 th June 2026

Under Reg. Ref. LRD25A/0009W, permission was sought for an LRD comprising 199 No. residential dwellings, 4 No. retail units, 4 No. commercial units, a bicycle sales and repair shop, an off-licence, a bar, a café, a medical centre, a dental practice, a pharmacy, a beauty/health salon and a crèche on lands at Belgard Square East (Figure 3.2).



Figure 3.2: Proposed Site Layout Plan

(Source: Donnelly Turpin Architects, 2025)

In considering the built-form and layout of the proposed development, the Planning Officer found it to be acceptable, as it demonstrated a coherent arrangement of buildings and spaces that responded appropriately to the site context and reflected the provisions of the *Tallaght Town Centre Local Area Plan 2020* (LAP). In relation to the scale of development, the proposed plot ratio of 2.4:1 (representing the maximum permissible, inclusive of the full 20% additional flexibility) was similarly considered acceptable having regard to the collective public benefits arising from the development of the site and the standard of design proposed. In relation to height, the Planning Officer remarked:

"The Tallaght LAP identifies a maximum building height of between 6 and 7 storeys across the site. The submitted particulars confirm that the proposed development comprises two blocks ranging in height from 2 to 7 storeys. The proposed building[s] are generally consistent with the LAP's prescribed maximum building heights and are therefore considered acceptable."

The proposed density of 243 No. units per hectare was similarly considered acceptable having regard to the site's location and the prevailing built form of the area. In this regard, the Planning Officer noted:

"The Tallaght LAP does not identify preferred densities (with its focuses instead being on preferred plot ratios and preferred building heights). Having regard to the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities 2025, the application site is best categorised as a 'City-Urban Neighbourhood' area type, which has a preferred density range of 50dph to 250dph. Whilst the proposed density of 243 dph is clearly at the upper end of the preferred density range, it is nonetheless considered acceptable in this instance given the site's central urban location, its proximity to both existing and planner [sic] high-quality public transport services and the established built form context of the area."

Furthermore, no concerns were raised regarding the proposed car parking ratio of 0.29 No. spaces per dwelling. The Planning Officer ultimately concluded:

"The overall scheme broadly aligns with the relevant policies and objectives of the South Dublin County Development Plan 2022–2028 and the Tallaght Local Area Plan 2020 and would contribute to housing delivery in the County on suitably located and serviced sites. The scheme is at an appropriate scale and density relative to the context of the site and wider receiving environment and would accord with the provisions of the 2022–2028 CDP regarding the 'TC' land use zoning objective of the site, and relevant policies and objectives regarding residential consolidation and intensification, reflecting the wider objectives of the RSES including the implementation of the MASP.

Having regard to the provisions of the South Dublin County Council Development Plan 2022–2028, Tallaght Local Area Plan 2020 and the overall design and scale of the development proposed it is considered that, subject to conditions set out below, the proposed development would not seriously injure the amenities of the area or of property in the vicinity and would, therefore, be in accordance with the proper planning and sustainable development of the area."

SDCC ultimately decided to Grant Permission for the development on 21st January 2026, subject to 25 No. Conditions. This decision has been appealed by a Third-Party to An Coimisiún Pleanála and an outcome is due by 8th June 2026

3.2.2 SDCC Reg. Ref. SD188/0008 – Older Person's Residential Development on Lands at Whitestown Way

SDCC Reg. Ref.:	SD188/0008
Location / Address:	Tallaght Stadium, Sean Walsh Park, Whitestown Way, Tallaght, Dublin 24
Applicant:	Clúid Housing Association Limited
Application Date:	13 th September 2018
Development Description:	The proposed development principally comprises: the construction of an older person's residential development consisting of a range of 2 No. storey to 4 No. storey apartment blocks comprising a total of 81 No. units (18 No. 2 bedroom (3 person) units and 63 No. 1 bedroom (2 person) units) with associated car parking. The proposed development also includes: a new access road off Whitestown Way; communal facilities, including an office, communal living room, wc's, laundry and mobility store; renewable energy design measures for each dwelling; communal open space with perimeter fencing to southern boundary; ESB substation; temporary construction

	signage; estate signage; site perimeter boundary treatment; and all other associated site works.
Decision Date:	10 th December 2018
Decision:	Part 8 Approved By Council

In summary, this Part 8 Application sought to deliver an older person’s residential development comprising 81 No. apartments on lands to the east of the subject site, on the opposite side of Whitestown Way (Figure 3.3).



Figure 3.3: Proposed Site Plan / Landscaping Plan

(Source: South Dublin County Council Planning Portal – Reg. Ref. SD188/0008)

During the December County Council Meeting on 10th December 2018, the Council approved the delivery of said development:

*"As the proposed development is in accordance with the proper planning and sustainable development of the area, the Council approves the development of 81 apartment homes at land situated between Seán Walsh Park, Tallaght Stadium and Whitestown Way, Tallaght, Dublin 24 as proposed in this report be **ADOPTED** and **APPROVED**."* [Emphasis Original]

3.3 Planning History Assessment

The subject site has a limited planning history. The most recent Planning Application (Reg. Ref. SD15A/0032) sought outline permission for a drive-through restaurant, petrol station and convenience store on lands that included part of the subject site. However, this proposal is of limited relevance in assessing the content and characteristics of the subject development, due to their very different natures. Yet, its Grant of Planning Permission is evidence of the Council’s desire to see the site redeveloped and their acceptance of a site entrance away from the existing entrance at The Arena to the site’s north-east corner.

Of particular relevance to the subject development is the recent Planning Application pertaining to lands at Belgard Square East (Reg. Ref. LRD25A/0009W). It is evident from our review of this

Application that increased building heights and densities, together with reduced car parking provision – subject to the delivery of high-quality design – are considered appropriate in highly accessible and well-served locations. Whilst this Planning Application is on appeal to ACP, it is wholly relevant as precedent due to the positive assessment and decision from SDCC.

The subject proposal, which will deliver high-quality residential units on a currently underutilised, highly accessible and well-served site, is consistent with the policies and objectives of the County Development Plan, as will be demonstrated later in this Report. Ultimately, many of the same principles that have been applied and accepted in the examples above reinforce and justify the approach taken for the subject scheme.

4.0 DEVELOPMENT DESCRIPTION

The following section provides an overview description of the proposed development and should principally be read in conjunction with the design materials prepared by RAU, DBFL and Mitchell + Associates.

4.1 Key Site and Development Statistics

Gross Site Area	1.32 Ha
Net Site Area²³	1.04 Ha
True Developable Site Area²⁴	0.96 Ha
No. of Residential Units	169 No.
Breakdown of Units	<ul style="list-style-type: none"> • 80 No. 1-bed (47%) • 85 No. 2-bed (50%) • 4 No. 3-bed (3%)
Residential Floor Area	<ul style="list-style-type: none"> • 14,457.2 sq m (gross)
Non-Residential Uses and Floor Area	<ul style="list-style-type: none"> • 2 No. class 1 / class 2 commercial units (totalling 356.5 sq m) • Crèche (162.8 sq m), with enclosed outdoor play area • Total floor area of 519.3 sq m
Total Floor Areas	<ul style="list-style-type: none"> • Total (exc. undercroft car park): 14,976.5 sq m • Total (inc. undercroft car park): 16,952.6 sq m
Public Open Space	2,444 sq m (18.4% of gross site area and 23.4% of the net site area)
Communal Open Space	1,185 sq m (exceeding the minimum requirement of 1,023 sq m by 162 sq m or 15.8%)
Height	1 No. to 6 No. storeys
Plot Ratio	<ul style="list-style-type: none"> • 1.13:1 based on gross site area, per the explicit wording of the LAP • 1.44:1 based on net site area • 1.56:1 based on the 'true developable site area' (see Section 6.2.3 below)
Proposed Density (Dwellings per Hectare (dph), calculated in accordance with the Compact Settlements Guidelines)	<ul style="list-style-type: none"> • 167.7 dph
No. of Car Parking Spaces	77 No.
No. of Cycle Parking Spaces	370 No.
No. of Motorcycle Parking Spaces	5 No.
Proposed % of Dual Aspect Units	39%

Table 4.1: Key Site and Development Statistics

(Source: RAU, 2026 and Thornton O'Connor Town Planning, 2026)

²³ The net site area for this stage of the Planning Application process has been defined to align with the lands in the Applicant's ownership, as this effectively aligns with the definition for same established by the Compact Settlements Guidelines. Therefore, for a clear understanding of same, please refer to RAU's enclosed drawing titled *Proposed Site Plan - Applicant - SDCC & DCC Ownership*.

²⁴ See Section 6.2.3 below.

4.2 Development Description

The proposed development principally comprises the construction of a mixed-use development in 2 No. blocks (Block A to the east (front) and Block B to the west (rear)) with a gross floor area of 14,976.5 sq m (excluding undercroft car parking area of 1,975.8 sq m) and ranging in height from 1 No. storey (undercroft / podium) to 6 No. storeys (Figure 4.1). The 2 No. blocks are joined at ground floor level by a single-storey undercroft car park, atop which is a sizable communal amenity space.



Figure 4.1: Aerial Image of the Proposed Development (Taken From a South-South-Westerly Direction) Demonstrating the Simplicity of the Form and its Modulation by Way of Subtle Insets/Insteps and the Shortening of Block A Relative to Block B

(Source: 3D Design Bureau, 2026)

As shown in Figure 4.1 (above) and Figure 4.2 (below), Block A is shorter in length than Block B. This, along with the inseting/instepping of the building plans/footprints, modulates and disaggregates the form. This is complemented by the vertical emphasis achieved by way of the stacked balconies, rectangular glazing and use of darker brick in the insets/insteps (Figure 4.2). However, the mundanity that this approach can sometimes create in designs is avoided in this proposal by staggering and offsetting some balconies, for example at the frontage to Whitestown Way; thereby, creating an animated and varied presentation to the public realm.



Figure 4.2: CGI of the Proposed Development From the South-East, with Block A Closest and Block B in the Left Background

(Source: 3D Design Bureau, 2026)

The development includes the following uses:

- 169 No. residential units, as 80 No. 1-bed, 85 No. 2-bed; and 4 No. 3-bed.
- 2 No. class 1 / class 2 commercial units totalling 356.5 sq m.
- A crèche of 162.8 sq m, with external play area.

The breakdown of the dwelling mix across the 2 No. blocks is summarised in Table 4.2 below.

No. Beds	1 Bed	2 Bed	3 Bed	Total
Block A	32	36	2	70
Block B	48	49	2	99
Total	80	85	4	169
Dwelling Mix	47%	50%	2%	100%

Table 4.2: Proposed Dwelling Mix

(Source: RAU, 2026 and Thornton O'Connor Town Planning, 2026)

The proposed apartments feature from ground floor up to fifth floor (i.e. across all 6 No. storeys). The non-residential uses (class 1 / class 2 commercial units²⁵ and crèche) are proposed at ground floor level along the northern, eastern and southern sides of Block A, where they provide an active and vibrant frontage onto the proposed shared surface, Whitestown Way and the proposed public open space (Figures 4.3 and 4.4). Yet, the relationship of these uses with Whitestown Way is neither abrupt nor stark; it is moderated and softened by an attractive landscape proposition of soft and hard surfaces and street tree planting. A stretch of this (as shown in the drawing titled *Proposed Site Plan – Applicant – SDCC & DCC Ownership*) includes land in the ownership of South Dublin County Council / Dublin City Council.

²⁵ Discussed in greater detail in Section 6.1 below.

The development also comprises:

- Junction with Whitestown Way and new street at the site's southern side. This continues westwards to the edge of the site within the Applicant's ownership. The road can be extended farther west to tie in with Whitestown Road in the future, although this is not currently proposed, as it relates to lands outside of the Applicant's control.
- Turning head in the south-east corner. This can be reconfigured in the future as car parking spaces or landscaping if the above through road is completed.
- 77 No. car parking spaces, with 66 No. within the undercroft car parking area and 11 No. on-street.
- 2 No. set-down bays, for use by crèche use, postal persons, deliveries, taxis, etc.
- 5 No. motorcycle parking spaces within the undercroft parking area.
- Cycle parking, with 270 No. spaces in secure, enclosed spaces and 100 No. as passively surveilled, external, short-stay spaces.
- Hard and soft landscaping, including:
 - Public open space (Figure 4.3) in 2 No. locations of 2,130 sq m and 314 sq m (totalling 2,444 sq m) and containing carefully considered tree and shrub planting. Species selected include *Pinus sylvestris* (Scots Pine), *Quercus robur* (Pedunculate Oak), *Betula pendula* (Silver Birch) and *Alnus glutinosa* (Common Alder). LEAP play features are also proposed in the larger public open space, enveloping the attenuation basin. Seating supplements the spaces, giving them focal points for socialising and rest.
 - Communal amenity space (Figure 4.4) at podium level atop the undercroft car park totalling 1,185 sq m. Planting includes grassed lawns, ornamental shrubs and trees, with selected species featuring *Betula pendula* (Silver Birch), *Cercis canadensis* (Eastern Redbud) and *Malus sylvestris* (Crab Apple). Play features are integrated into the amenity space to give it functionality and to create localised vibrancy in a safe and easily monitored location.
 - Incidental spaces throughout, such as verges, landscape buffers and defensible space, and street trees.



Figure 4.3: CGI of the Proposed Development From the South-West, Looking Over and Across the Main Public Open Space (with Play Equipment and Functional SuDS) Towards Block B

(Source: 3D Design Bureau, 2026)



Figure 4.4: CGI of the Proposed Development From Within the Communal Amenity Space Between the 2 No. Blocks

(Source: 3D Design Bureau, 2026)

Furthermore, the development proposes:

- Private amenity spaces (facing all directions as balconies at upper floor levels and terraces at ground floor and podium interfacing levels).

- Boundary treatments.
- Sub-station.
- Plant/operational rooms.
- Bin stores.
- Public lighting.
- Green roofs.
- Rooftop plant, PV arrays, lift overruns, telecommunications infrastructure and automatic opening vents.
- All associated works above and below ground.

5.0 STRATEGIC PLANNING POLICY CONTEXT

The following Section provides an overview of strategic national and regional planning policy and the proposed development's compliance with same. However, please note that the more detailed planning assessment is contained in Section 6.0 below.

5.1 *Project Ireland 2040: National Planning Framework*

Project Ireland 2040: National Planning Framework is the Government's high-level, overarching strategic plan that aims to shape the future growth and development of the country. It was originally published in February 2018, but was revised under the *National Planning Framework First Revision (2025) (NPF)*.

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

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

- *"Targeting a greater proportion (40%) of future housing development to be **within the existing 'footprint' of built-up areas.**" [emphasis added]*
- *"**Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.**" [emphasis added]*

Section 6.6 of the NPF further calculates that:

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

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

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

The NPF augments the above, remarking:

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

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

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

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

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

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

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

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

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

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

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

Table 5.1 below sets out how the proposed development will contribute towards achieving the 10 No. NSOs identified in the NPF.

No.	National Strategic Outcome	How it is addressed by this development	Criteria met?
1	Compact Growth	Residential-led, mixed-use development at an infill site, increasing local densities and land-use intensities proximal to existing and proposed public transport, services, facilities and amenities.	Yes
2	Enhanced Regional Accessibility	Proximal to bus stops and the Luas Red Line, enabling prompt onward connectivity to inter-city rail.	Yes
3	Strengthened Rural Economies and Communities	N/A	N/A
4	High-Quality International Connectivity	N/A	N/A
5	Sustainable Mobility	Ties into existing cycle and pedestrian infrastructure by way of DMURS-compliance and the delivery of aspects such as the shared surface to the north, creating new opportunities for pedestrian permeability through the site. A range of services, facilities and amenities are available in the area, thereby promoting active modes. Located within a short walking distance to the Luas Red Line, frequent bus services and 3 No. proposed Spine BusConnects routes.	Yes
6	A Strong Economy Supported by Enterprise, Innovation and Skills	The mixed-use aspect of the scheme will generate employment through the provision of retail and commercial units.	Yes
7	Enhanced Amenity and Heritage	A high Green Space Factor score (exceeding the 0.5 required for sites such as this) is evidence of the positive efforts to support ecology and more environmentally considered design. No Protected Structures, protected archaeological features or Architectural Conservation Areas are present at or in the environs of the site.	Yes
8	Transition to a Low Carbon and	Low car parking and high cycle parking provision will encourage the use of active modes and public	Yes

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

Table 5.1: Compliance with the NPF's NSOs

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

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

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

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

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

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

NPO 12 – *"Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being."*

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

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

NPO 20 – *"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing*

cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."

NPO 22 – *"In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth."*

NPO 37 – *"Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages."*

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

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

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

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

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

5.2 Urban Development and Building Heights – Guidelines for Planning Authorities

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

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

The Guidelines remark that:

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

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

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

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

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

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

- SPPR 2 – Relates to the role of planning authorities achieving greater heights and mixed-use development and mechanisms to achieve same;
- SPPR 3 – Relates to developments that do not comply with the specific objectives of the relevant development plan or local area plan, however, as detailed in Section 6.2, the height of the proposed development is considered to be in accordance with the relevant local area plan; and
- SPPR 4 – Relates to planning at greenfield, edge of settlement locations, yet the subject site is an infill site.

Ultimately, we refer the Council to Section 6.2 below where building height is discussed in greater detail.

5.3 Planning Design Standards for Apartments: Guidelines for Planning Authorities

The updated *Planning Design Standards for Apartments: Guidelines for Planning Authorities* (Apartment Design Guidelines) were published in July 2025. The Apartment Design Guidelines define (1) the preferred locations for apartment developments to encourage higher densities and consolidate residential development, and (2) the development management standards to which they should be designed.

The Apartment Design Guidelines prescribe a series of SPPRs with which apartment developments must comply, although with dispensations in some instances. The SPPRs of relevance to the proposed development are identified and responded to in Table 5.2 below. Note that SPPRs 6, 7 and 8 of the Guidelines do not apply to this specific development type.

SPPR No.	Requirement	Response/ Compliance
1	<p>(A) <i>With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.</i></p> <p>(B) <i>Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.</i></p>	Refer to Section 6.4 below for full details.
2	<p><i>The following minimum apartment floor areas shall apply and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:</i></p> <ul style="list-style-type: none"> • <i>Studio apartment (1 person) 32 sq.m</i> • <i>1-bedroom apartment (2 persons) 45 sq.m</i> • <i>2-bedroom apartment (3 persons) 63 sq.m</i> • <i>2-bedroom apartment (4 persons) 73 sq.m</i> • <i>3-bedroom apartment (4 persons) 76 sq. m</i> • <i>3-bedroom apartment (5 persons) 90 sq.m</i> <p><i>The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.</i></p>	Refer to Section 6.5.1 below for full details. Please also refer to RAU's enclosed schedules.
3	<p><i>In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</i></p> <p>(i) <i>A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.</i></p> <p>(ii) <i>For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.</i></p>	<p>A total of 66 No. units (39%) are dual thereby complying with this SPPR.</p> <p>Refer to Section 6.5.3 below for further details.</p>

SPPR No.	Requirement	Response/ Compliance
4	<i>Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.</i>	Ground floor level ceiling heights of 3.17 m are proposed. Therefore, the development complies with this SPPR.
5	<i>There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.</i>	This is noted. Please refer to Section 6.5.7 below for full details.

Table 5.2: Evidence of compliance with the relevant SPPRs of the Apartment Design Guidelines

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

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

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

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

As with the Apartment Design Guidelines, the Compact Settlements Guidelines define a suite of SPPRs, but also a series of 'Policies and Objectives'. The rest of this sub-section lists these and provides brief responses to demonstrate the proposed development's compliance with same (Tables 5.3 and 5.4). Note that SPPR 2 does not apply to this scheme as it relates to private amenity space requirements for house unit types, none of which are proposed as part of this development.

Specific Planning Policy Requirements

SPPR No.	Requirement	Response/ Compliance
1	Separation Distances <i>It is a specific planning policy requirement of these Guidelines that statutory development plans* shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above</i>	Please see the detailed discussion in Section 6.3 below.

SPPR No.	Requirement	Response/ Compliance
	<p><i>ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms** at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.</i></p> <p><i>There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.</i></p> <p><i>In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.</i></p> <p><i>This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."</i></p> <p><i>* "Any reference to a statutory development plan(s) in these Guidelines refers to all development plans made under the Planning and Development Act 2000 (as amended) or under any replacement Planning and Development Act, including local area plans and strategic development zones planning schemes.</i></p> <p><i>** "Refer to definition in Appendix A: Glossary of Terms." The Appendix defines this as "Primary living spaces such as living rooms, dining rooms, studies and bedrooms.</i></p>	
3	<p>Car Parking</p> <p><i>It is a specific planning policy requirement of these Guidelines that:</i></p> <p>(i) <i>In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.</i></p>	Please see the detailed discussion in Section 6.7.1 below.

SPPR No.	Requirement	Response/ Compliance
	<p>(ii) <i>In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.</i></p> <p>(iii) <i>In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling.</i></p> <p><i>Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.</i></p> <p><i>This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.</i></p>	
4	<p>Cycle Parking and Storage</p> <p><i>It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.</i></p> <p><i>The following requirements for cycle parking and storage are recommended:</i></p> <p>(i) <i>Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.</i></p>	<p>Please see Section 6.7.2 below for details of the calculated cycle parking requirement, as well as the quantum and location of those spaces proposed for provision.</p>

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

Table 5.3: SPPRs and compliance with same

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

Policies and Objectives

P&O No.	Requirement	Response/ Compliance
3.1	<p>Densities</p> <p><i>It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate."</i></p> <p>We contend that the site falls within the category of a 'City – Urban Neighbourhood', per the definition in its Table 3.1 as it falls within the (i), (ii) and (iii) criteria:</p> <p><i>"The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork."</i></p>	<p>Based on the guidance and methodology contained in the Guidelines, a density of 167.7 dph is proposed. This falls within the range for this location.</p> <p>Refer to Section 6.2 below for full details.</p>
4.1	<p>DMURS</p> <p><i>It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the</i></p>	<p>Please refer to the <i>DMURS Design Statement</i> prepared by DBFL in respect of this Policy and Objective.</p>

P&O No.	Requirement	Response/ Compliance
	<p><i>Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking.</i></p>	
4.2	<p>Quality Urban Design and Placemaking</p> <p><i>"It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications."</i></p> <p>The "key indicators of quality urban design and placemaking" set out in Section 4.4 of the Guidelines fall under the headings of:</p> <p>"Sustainable and Efficient Movement"</p> <p><i>"Ensuring places are well connected and accessible by sustainable modes. Also acknowledging that quality of journey is equally important and that places are perceived as safe and are not dominated cars."</i></p> <p>"Mix and Distribution of Uses"</p> <p><i>"Promoting the integration of land uses and transportation and a diverse and innovative mix of housing that can facilitate compact housing and provide greater housing choice."</i></p> <p>"Green and Blue Infrastructure"</p> <p><i>"Placing and [sic] emphasis on the protection of natural assets and biodiversity, whilst also taking a more strategic view as to how open space networks are formed to balance the needs of communities."</i></p> <p>"Responsive Built Form"</p> <p><i>"Placing an emphasis on the creation of a coherent urban structure and design approach that responds to local character and is attractive."</i></p>	<p>Please refer to the <i>Design Statement</i> prepared by RAU in respect of this Policy and Objective.</p>
5.1	<p>Public Open Space</p> <p><i>It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different</i></p>	<p>Public open space of 2,444 sq m (18.4% of gross site area and 23.4% of the net site area) is proposed, exceeding the standards of the Development Plan and this SPPR.</p>

P&O No.	Requirement	Response/ Compliance
	<p><i>areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.</i></p> <p><i>In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.</i></p> <p><i>In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.</i></p> <p><i>In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site.</i></p>	<p>Refer to Section 6.6.1 below for full details.</p>

Table 5.4: Policies and objectives and compliance with same

Source: *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024)* and Thornton O'Connor Town Planning (2026)

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

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

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

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

"The Site-Specific Flood Risk Assessment for the proposed development was undertaken in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities, November 2009.

It is concluded that;

- *Following the flood risk assessment stages, it was determined that the majority of the subject site, and all areas where buildings are proposed are within Flood Zone C, and at a low risk of fluvial flooding. A small portion of the proposed road in the southeastern area of the site may be within Flood Zone A and B due to flooding from the Whitestown Stream. A Justification Test for the development has been applied and passed for the portion of the development within Flood Zone A and B.*
- *The proposed development will not increase runoff rates when compared with the existing site and satisfies the requirement of the SFRA to reduce flooding and improve water quality.*
- *A possible source of flood risk from the surcharging or blockage of the development's drainage systems has been identified. This risk is mitigated by suitable design of the drainage network, regular maintenance and inspection of the network and establishment of exceedance overland flow routes.*

In conclusion, the proposed development is considered to be in compliance with The Planning System and Flood Risk Management Guidelines for Planning Authorities."

5.6 Design Manual for Urban Roads and Streets

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

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

5.7 Childcare Facilities: Guidelines for Planning Authorities

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

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

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

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

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

Based on the guidance above and that provided in the more contemporary Apartment Design Guidelines, it is necessary to determine if, and to what extent, childcare requirements exist on a case-by-case, project-by-project basis. For this project, the childcare requirement of 24 No. places was calculated using the 20:75 rate of provision and based on 89 No. units²⁶.

However, in the analysis undertaken in the *Social Infrastructure Audit* prepared by Thornton O'Connor Town Planning (enclosed under separate cover), it was determined that estimated demand for childcare places would be limited to approximately 4.9 No. We note that the proposed crèche, based on its floor area of 162.8 sq m will have capacity for approximately 33 No. children. However, this may be greater, subject to the services offered and the ages of children accommodated.

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

5.8 **Part V of the Planning and Development Act: Guidelines Issued by the Minister**

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

To comply with the Part V requirements of the *Planning and Development Act 2000* (as amended), we firstly note that the 20% minimum Part V contribution applies. Consequently, a total of 34 No. units (20.1% of total units) are proposed for transfer/sale to the Council. These include 18 No. 1-bed, 14 No. 2-bed and 2 No. 3-bed units, which are identified on the drawings listed below and enclosed. Costings are also provided.

Please refer to the following enclosures which meet the statutory Planning Application-stage Part V proposal requirements:

- Drawings prepared by RAU –
 - *Proposed Ground Floor Plan Part V*
 - *Proposed First Floor Plan Part V*
 - *Proposed Second Floor Plan Part V*

²⁶ This excludes/omits all of the 1-bed units, as is permitted by the Apartment Design Guidelines.

- *Accommodation Schedule Part V* prepared by RAU.
- Part V costings sheet, prepared by the Applicant.

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

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

As shown in Figure 5.1, there are 4 No. principal stages to Appropriate Assessment. For the mixed-use development proposed on the subject site, the enclosed AA *Screening Report* (prepared by OCSC) screened out, at Stage 1, that the proposal would have "adverse effects" on the integrity of Natura 2000 sites.

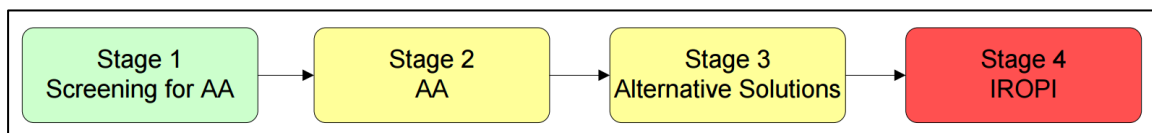


Figure 5.1: The 4 No. Stages of the Appropriate Assessment Process

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

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

"The Habitats Directive provides legal protection for habitats and species of European importance and establishes the requirement for an AA. This AA screening is based on best scientific knowledge and has utilised ecological and hydrological expertise. In addition, a detailed online review of published scientific literature and 'grey' literature was conducted.

This AA screening has been prepared for the proposed Large Scale Residential Development at Whitestown Way, Tallaght, Dublin 24. There is no spatial overlap between the study area and any Natura Site. The closest Natura site is the Glenasmole Valley SAC (001209) located 2.58km south of the site. Due to the lack of spatial overlap between the site and Glenasmole Valley SAC, the lack of a hydrological connection, and the scale and nature of the proposed works the impacts to Natura sites are predicted to be unlikely and negligible. No other Natura 2000 sites located within the 5km zone of impact of the site will be impacted by the proposed works.

No changes are predicted to occur at any designated sites which may result in effects on the conservation objectives of those sites with regard to the following:

- *habitat or species fragmentation*
- *climate change*
- *disturbance to key species*

- reduction in species density
- changes in key indicators of conservation value
- reduction of habitat area...

This stage 1 screening for AA of the Large Scale Residential Development at Whitestown Way, Tallaght, Dublin 24 has considered potential effects which may arise during the construction and operational phases as a result of the implementation of the project.

The AA screening process has considered potential effects which may arise during the construction and operational phases. Through an assessment of the pathways for effects and an evaluation of the project characteristics, taking into account the processes involved and the distance of separation from European sites, it has been evaluated that the works are unlikely to impact these sites in terms of adverse effects on their qualifying interests, special conservation interests, or conservation objectives.

This evaluation is made in view of the conservation objectives of the habitats or species for which these sites have been designated. Consequently, a Stage Two Appropriate Assessment is **not** required for the project." **[emphasis original]**

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

The Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019–2031 (RSES) was published on 26th June 2019. Contained within this regional planning document are Regional Policy Objectives (RPOs) which are intended to contribute to the sustainable planning and development of the Eastern and Midlands Region over the life of the Strategy to 2031, although with a vision to 2040. Many of the RSES's RPOs complement those of the NPF with respect to the sustainable growth and consolidated development of the region. The Regional Strategic Outcomes (RSOs) – which the RPOs seek to attain – are summarised in Figure 5.2.

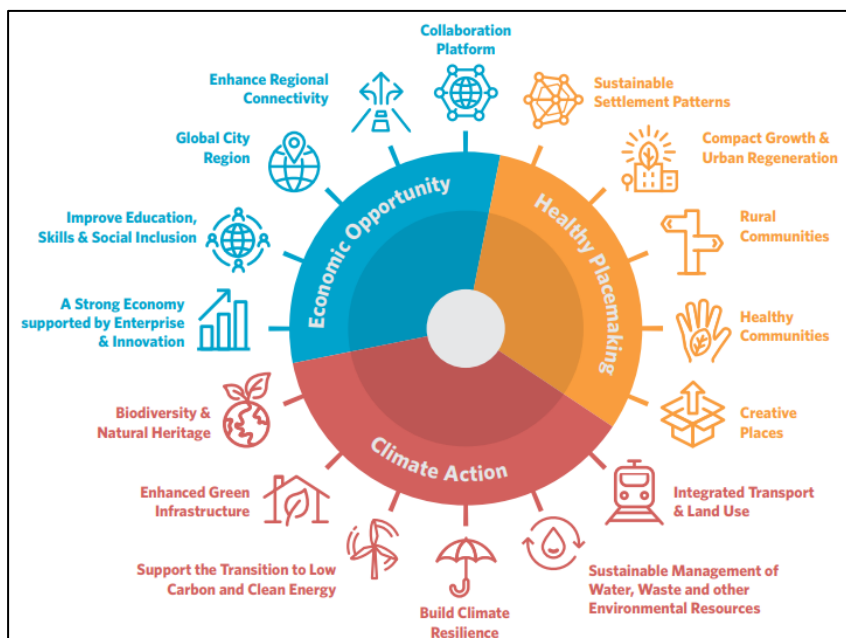


Figure 5.2: Regional Strategic Outcomes of the RSES

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

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

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

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

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

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

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

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

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

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

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

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

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

"...combines the growth of Dublin and regional centres with a selected number of large self-sustaining settlements that have the assets and capacity to grow in a sustainable manner

while minimising impacts on the receiving environment. This option offers the best opportunity to align services with population and economic growth, promote compact growth in urban settlements and make the best use of infrastructure including public transport thereby reducing transport emissions and improve regional accessibility.”

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

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

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

6.0 PLANNING POLICY OVERVIEW AND ASSESSMENT

The purpose of this Section is to detail the relevant policies and objectives applicable to the proposed development on the subject site. The Development Plan is the statutory plan for South Dublin and guides development relating to the subject site. Additionally, the LAP is the supplementary document that will influence planning and development at the granular, local level.

Further to these statutory plans, several Section 28 Guidelines apply (as noted in Section 5.0 above). These documents and their guidance and principles are identified as appropriate.

6.1 Zoning

Under the Development Plan, the subject site is zoned as 'REGEN' (Figure 6.1). The specific objective of this land-use zoning designation is stated as being:

"To facilitate enterprise and/or residential led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery."

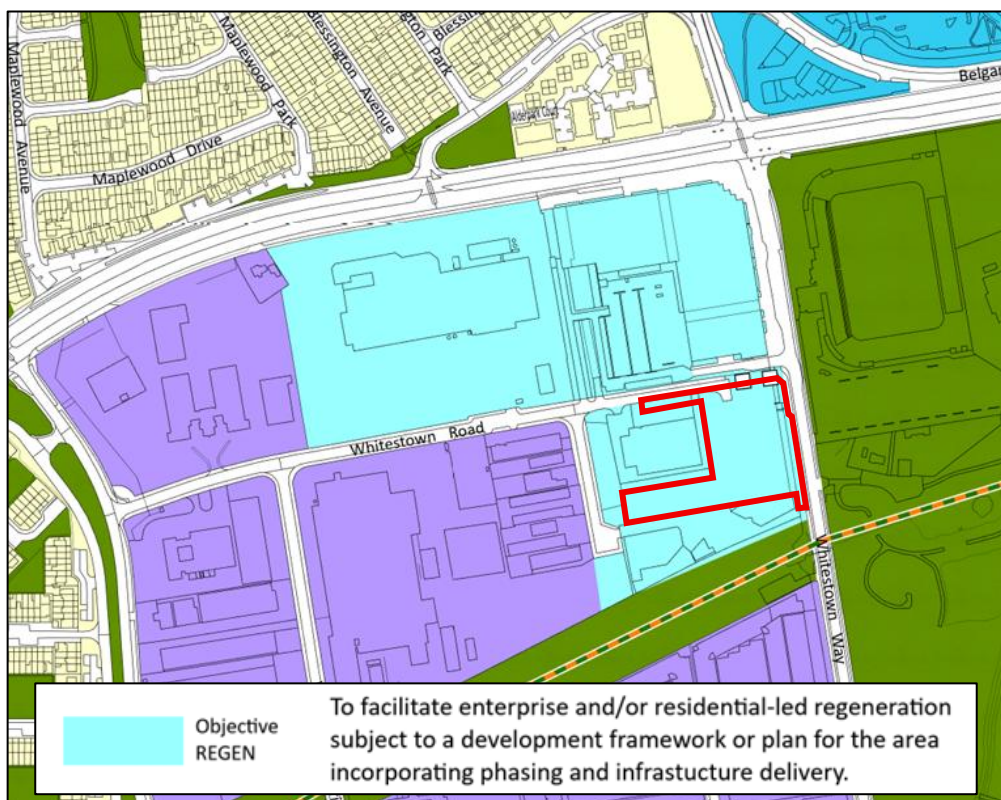


Figure 6.1: Zoning Map No. 9, Subject Sites (Outlined Indicatively in Red) Zoned REGEN

Source: Extract from *South Dublin County Development Plan 2022–2028 Zoning Map 9*, Annotated by Thornton O'Connor Town Planning, 2026

A broad range of uses are considered permissible and open for consideration on REGEN-zoned lands in the Development Plan. These uses are summarised in Table 6.1, below, and reflect the objective for the zoning to deliver enterprise and residential-led development, which we note is appropriate for the site given its position within 'The Centre' neighbourhood area.

Permitted in Principle	Advertisements and Advertising Structures, Bed & Breakfast, Betting Advertisements and Advertising Structures, Childcare Facilities , Community Centre, Education, Enterprise Centre, Health Centre, Home Based Economic Activities, Hotel / Hostel, Housing for Older People, Industry-Light, Live-Work Units, Motor Sales Outlet, Office-Based Industry, Office less than 100 sq m, Offices 100 sq m-1,000 sq m, Offices over 1,000 sq m, Open Space, Petrol Station, Public Services, Recreational Facility, Residential , Restaurant / Café, Residential Institution, Science and Technology Based Enterprise, Shop-Local , Sports Club / Facility, Stadium, Traveller Accommodation, Work-Live Units
Open for Consideration	Allotments, Bed & Breakfast, Betting Office, Boarding Kennels, Car Park, Crematorium, Cultural Use, Data Centre, Doctor / Dentist, Embassy, Funeral Home, Garden Centre, Guest House, Hospital, Industry-General, Nursing Home, Off-Licence, Place of Worship, Primary Health Care Centre, Public House, Recycling Facility, Retail Warehouse, Retirement Home, Service Garage, Shop-Neighbourhood , Social Club, Veterinary Surgery, Warehousing, Wholesale Outlet.
Not Permitted	Abattoir, Aerodrome / Airfield, Agriculture, Camp Site, Caravan Park-Residential, Cemetery, Concrete / Asphalt Plant in or adjacent to a Quarry, Conference Centre, Fuel Depot, Heavy Vehicle Park, Industry-Extractive, Industry-Special, Nightclub, Outdoor Entertainment Park, Refuse Landfill / Tip, Refuse Transfer Station, Rural Industry-Food, Scrap Yard, Shop-Major Sales Outlet, Transport Depot, Wind Farm.

Table 6.1: 'Permissible', 'Open for Consideration' and 'Not Permitted' uses on REGEN-zoned lands per the Current Plan

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

The REGEN zoning of the subject site reflects its surrounding context, which comprises a mix of uses including low-rise industrial units at the edge of Tallaght Town Centre, The Arena mixed-use development and Tallaght Stadium. As the County town, the established use of the surrounding area allows for complementary leisure, retail, services, retail warehouse and commercial land uses.

The subject proposal is a residential-led, mixed-use development that will deliver upon the objective of the Development Plan's zoning for the subject site. Its inclusion of residential and childcare uses accords with those listed as being permitted in principle and open for consideration on REGEN-zoned lands.

With respect to the class 1 / class 2 commercial units, these have been proposed to maximise their potential flexibility in the future. Their legislative definitions can be summarised as:

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

Evidently, the proposed development will support local regeneration, enterprise and housing delivery. The dwellings will introduce all-day vitality and spending capacity, the commercial uses will generate employment and economic activity, and the crèche will enhance local social and community services.

Positively, the delivery of housing will directly meet the prevailing demand and need for same, whilst also increasing the local population and thus the critical mass required to sustain existing businesses and services, and to encourage the establishment of new options.

Therefore, the development is in compliance with the Development Plan from a land-use perspective.

6.2 Scale and Form of Development as Prescribed by the *Tallaght Town Centre Local Area Plan 2020*

The subject site is located within the planning boundary of the LAP, which prescribes specific development standards and guidance for scheme proposed within its operational extent.

The subject site falls within 'The Centre' neighbourhood area, which the LAP describes as follows:

"Continued transformation towards a high quality mixed use urban centre of city scale and character, promotion of new and enhanced retail, civic and town centre uses, new employment space and a vibrant mix of residential, that will support the whole of the County all set within an attractive network of streets, spaces and buildings."

Whilst this is a broad, qualitative vision, **against which the proposed development aligns**, the LAP also establishes prescriptive quantitative standards. The latter are intended to inform the scale and form of development. In the sub-sections below, we identify those of relevance to the subject site and development, as indicated in Section 3.2 of the LAP, and illustrate how the scheme has been designed to comply with them in each case.

6.2.1 Mixed-Use Frontage

Figure 3.2 of the LAP illustrates the requirement for development at the subject site to provide a mixed-use frontage at its north, east and south (Figure 6.2). Section 2.4.2 ('Mixed-Use Frontages') of the LAP provides specific guidance as to what that should entail:

"As a minimum, the mixed-use frontages identified in the Urban Function concept are required to have a mixed-use element and have a non-residential frontage at ground floor level, or some other acceptable alternative which performs the same function of providing activity at ground floor level. Minimum floor to ceiling heights of between 3.5 and 4 metres will be required to facilitate non-residential uses."

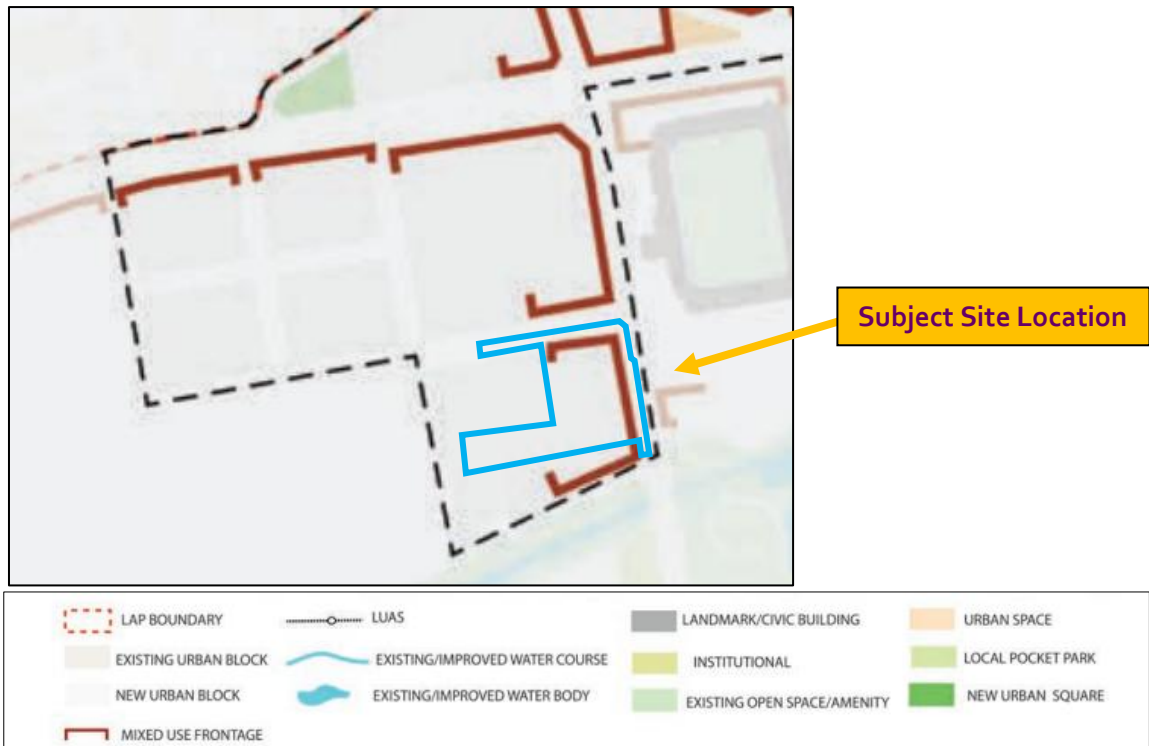


Figure 6.2: Map identifying the requirement for a mixed-use frontage at the subject site (indicatively outlined in blue)

Source: Tallaght Town Centre Local Area Plan 2020

The proposed development complies with this requirement, by proposing a series of different non-residential uses along the eastern side of Block A, which also wrap around to its northern and southern side. Their internal floor-to-ceiling heights are 4.5 m, giving them excellent flexibility and ensuring exceedance of the minimum requirement of the LAP.

These uses are the 2 No. class 1 / class 2 commercial units (totalling 356.5 sq m) and the crèche (162.8 sq m), with its external play area facing south. These uses vary and are different to the residential uses at upper levels and at the western side of Block B.

Therefore, they align with the mixed-use frontage requirement, as they directly engage with the site edges and interfaces with:

1. Whitestown Way (east),
2. The new local street (south), and
3. The new landscape shared surface (north).

Positively, the above-mentioned uses also provide vibrancy and activation along these sides of the development. This is in terms of both:

1. Their design and visual appearance, with greater use of glazing and paucity of balconies;
2. The internal use of the spaces as they are seen externally from the public realm and the comings-and-goings of staff and patrons.

These points are evident when one views the CGI of the frontage, as shown in Figure 6.3 below.



Figure 6.3: CGI of the proposed development from the south-east, with Block A closest and Block B in the background (left)

Source: 3D Design Bureau (2026)

Stitching the foregoing together, we are of the opinion that the proposal successfully delivers a mix of uses that creates a vibrant and attractive interface fronting onto Whitestown Way and other existing and proposed public realms.

6.2.2 Building Height

Figure 3.3 of the LAP indicates the height ranges applicable to the subject site (Figure 6.4) based on its location within 'The Centre' neighbourhood area. These vary from 4–6 No. storeys for residential development and 3–5 No. storeys for non-residential development. Additional guidance in Section 2.6.2 of the LAP aligns with this and states that:

"Building height and scale on secondary routes/frontages is lesser [than in central locations at proximate to the Luas] but still within an urban scale, (4–6 storeys residential, 3–5 storeys non-residential.)"

As the LAP also seeks a mixed-use frontage – thus a mixed-use development – at the subject site, it could be argued that either range applies. However, as the proposal is residential-led, we consider it appropriate to use the range of 4–6 No. storeys in guiding the development's permissible height²⁷.

²⁷ Notwithstanding this, we note that the LAP does state that the height standards may be exceeded where they reflect those of existing buildings, particularly in core areas of the town centre and proximate to the Luas and The Square Shopping Centre (albeit subject to compliance with various parameters prescribed by Section 2.6 of the LAP). Although exceedances are not proposed, we consider it prudent to note the flexibility that is provided by the LAP especially due to the site's adjacency to the taller, 8-storey The Arena development.

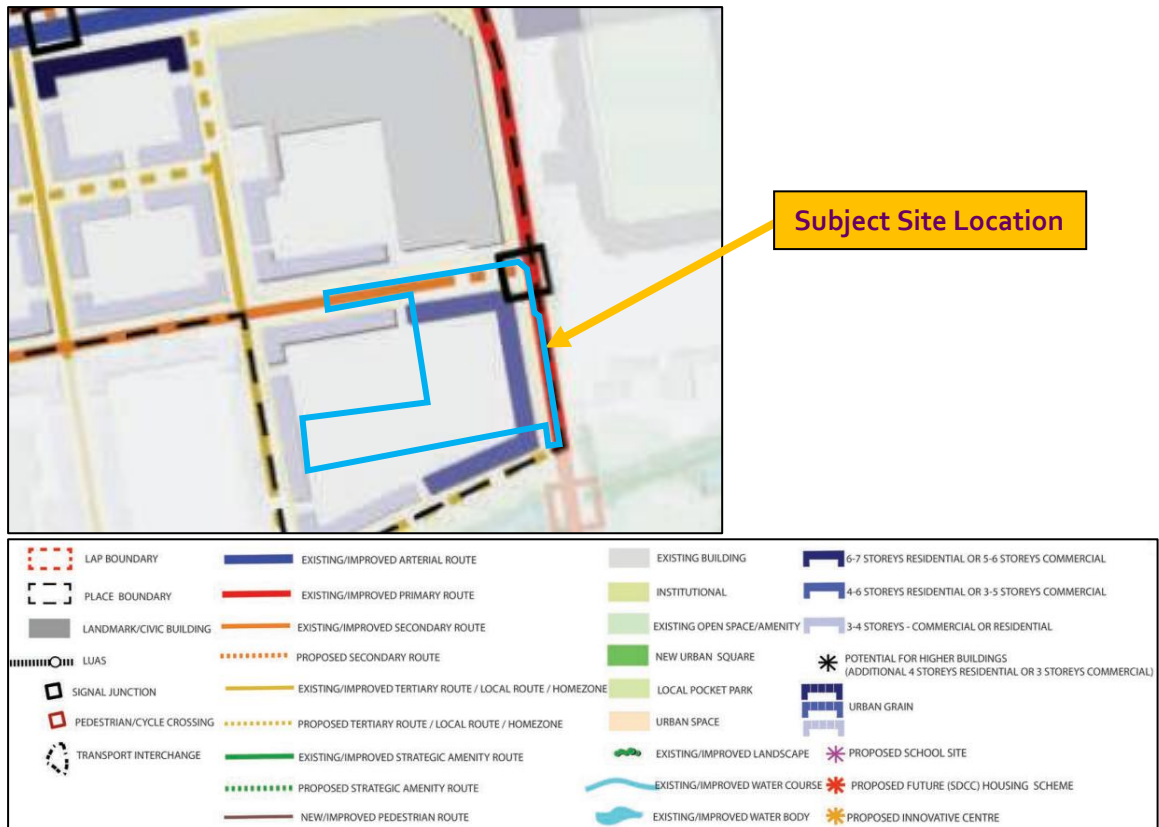


Figure 6.4: Height Strategy for the Subject Site (indicatively outlined in blue) as per Figure 2.8 of the LAP

Source: Tallaght Town Centre Local Area Plan 2020

In accordance with the LAP’s planning policy basis, the proposed heights are compliant at 6 No. storeys across the 2 No. blocks, although with a single-storey undercroft/podium connecting them. This unifying feature allows for a reduction in the overall bulk/massing of the development, but also serves to provide (1) covered/screened car parking and plant space, and (2) communal amenity space overhead.

In terms of the delivery of the heights, these are proposed with the 6-storey blocks arranged along north-south axes; a better configuration to accommodate the ingress of natural light and ventilation, and to define an assertive and robust frontage at Whitestown Way. Block A (fronting Whitestown Way) is shorter than Block B, which allows for a stepped and staggered presentation of the overall development. This results in a moderation of the perceived form, especially when viewed from the south-east (Figure 6.3), as Block B’s same height is ‘lessened’ by being setback from the road edge.

Design interventions to ensure that the uniform 6-storey heights do not appear monolithic or ‘monoform’ include the inseting/instepping of the building plans/footprints, which modulates and disaggregates the form. This is aided by the introduction of darker brick colours within the insets/insteps (a positive change since the LRDM-stage proposal), which define the order of the blocks and break them down into smaller vertical elements. Emphasising ‘the vertical’ goes a step further, and is achieved by way of the ordered fenestration, rectangular glazing and stacked balconies close to the corners (Figure 6.3). However, variation is achieved by way of the staggering and offsetting of some balconies at mid-block locations. The success of the foregoing is clearly evident from the ‘street level’ CGI shown in Figure 6.3 above.

Within the wider context, the achievement of the height is also clear in Figure 6.5, a verified view taken from a northerly position along Whitestown Way. The taller and more architecturally 'dramatic' development of The Arena (right foreground and middle-ground) expresses itself along the northern stretch of Whitestown Way up to its prominent junction with the N81. This allows the proposed development's lower-rise 6-storey form to provide a gradual, seamless transition.



Figure 6.5a and 6.5b: Verified view photomontages (baseline and proposed) illustrating the location, design and extent of the proposed development, with its 6-storey height at Whitestown Way inserting respectfully into the streetscape and interacting in a graduated manner with The Arena to the right

Source: 3D Design Bureau (2026)

6.2.3 Plot Ratio

6.2.3.1 Plot Ratio Policy

The LAP prescribes a minimum-maximum plot ratio for development on lands in The Centre neighbourhood of 1.5:1–2.0:1. However, the plan does provide flexibility with respect to plot ratio, allowing for increases in some instances:

"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.

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

Thus, depending on the final design, there may be an opportunity to increase the plot ratio in accordance with the above criteria by up to a maximum of 20%.

In relation to the calculation of plot ratio, page 26 of the LAP remarks that "...plot ratio ranges and [the] additional 20% floorspace bonus shall **normally** be calculated on the basis of the **gross site area**." **[emphasis added]**

Evidently, plot ratio is to "normally" be calculated using the "gross site area". It is vital that this very specific wording is recognised; it does not state that gross site area "must" or can only be used. In fact, it is an arbitrary area that fails to account for the site-specific nuances or attributes of individual locations. **Rather, it explicitly and specifically provides practical and pragmatic flexibility in calculating plot ratio.**

6.2.3.2 Plot Ratio Proposal and Justification

The plot ratio is calculated in Table 6.2. Using the gross site area (1.32 Ha) and applying the total development gross floor area (14,976.5 sq m) results in a plot ratio of 1.13. When the floor area is applied to the net site area (1.04 Ha), the plot ratio increases to 1.44.

However, we have considered the means of calculating plot ratio carefully and reflected upon the observations and requests in the *LRD Opinion* in relation to this aspect of the development and Planning Application.

Noting the specific wording of the LAP, we deem it reasonable to calculate the plot ratio based on what we determine to be the 'true developable area' of the site. Whilst 'gross' is the total red line boundary (i.e. extent of all works) and 'net' is defined by the Compact Settlement Guidelines based on what must and what cannot be included, we have established what we consider to be the realistic or 'true developable area' of the site.

This area of approximately 0.96 Ha excludes 3 No. distinct parts of the gross site to yield **an area that is the real extent of the site that can be developed**. Per Figure 6.6 below, it omits:

1. **To the north** – Part of the site which is to remain clear of development to retain the road objective and the prospect of a future road thereat per the consultation meetings with SDCC. The subject proposal includes this as a landscaped shared surface, tying into the existing and proposed footpaths and cycle path networks.

2. **To the east** – The stretch of the site along Whitestown Way that currently comprises footpaths, grass verge, landscaping and cycle paths. These are effectively being retained, and must be in order to continue their important role in promoting and accommodated sustainable modes of transport.
3. **To the south** – The area where the roads objective is relocated to and a new access road/street is proposed.

Ultimately, these are parts of the site that simply cannot be developed for residential or mixed uses. They are *de facto* sterilised from yielding built-forms. **On these bases, we contend that the resulting 'true developable area' is the appropriate site extent that should be used in calculating the plot ratio.**

This is vital to understand as it indicates the constraints to delivering additional floor area across the site (i.e. horizontally), thereby meaning that it could only be achieved by increasing the development's height (i.e. vertically). However, as discussed in Section 6.2.2, heights on-site are capped by the LAP, thereby also constraining this latter option.

With the resulting plot ratio of 1.56, the development aligns with the LAP, falling within the range of 1.5–2.0:1.

Site Extent	Total Development GFA (sq m)	Site Area (Ha)	Plot Ratio
Gross	14,976.5	1.32 Ha	1.13
Net	14,976.5	1.04 Ha	1.44
'True Developable Area'	14,976.5	0.96 Ha	1.56

Table 6.2: Plot ratio based on gross and net site areas

Source: Thornton O'Connor Town Planning (2026)

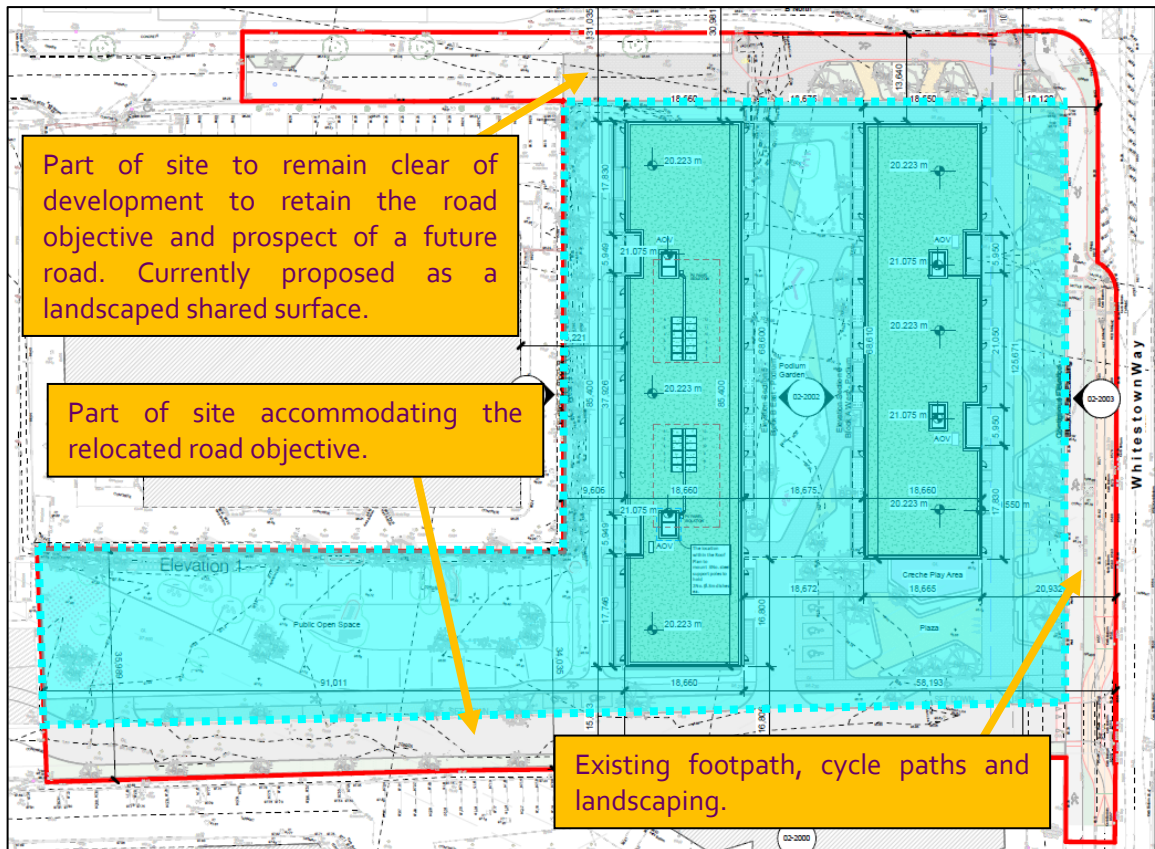


Figure 6.6: 'True developable site area' (in turquoise), which omits the undevelopable or 'reserved' parts of the overall site

Source: RAU (2026), annotated by Thornton O'Connor Town Planning (2026)

The overall scale and form are ultimately achieved in an appropriate and successful manner, as articulated in Section 6.2.2 (above) and RAU's *Design Statement*. They deliver a physically robust and active frontage to Whitestown Way (albeit setback to provide a landscaped interface), with the massing modulated by way of its inseting/instepping and use of materials, and height moderated as a transitional form relative to The Arena.

6.2.4 Residential Density

6.2.4.1 Local Policy Context

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

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

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

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

As such, it is submitted that the proposed development, located on lands zoned REGEN and within the LAP's 'The Centre' neighbourhood area, and in proximity to high-quality public transport systems, can accommodate and justify greater densities and scales of development.

6.2.4.2 Density as Dwellings per Hectare

No prescriptive standard for density is set in either the Development Plan or the LAP in terms of it being measured as dwellings per hectare (dph), therefore, the relevant guidance standards are taken from the Compact Settlement Guidelines.

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

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

At this juncture, we note that the Compact Settlement Guidelines only provide guidance on density as it is established as a 'Policy and Objective' and not an SPPR. With this considered, Policy and Objective 3.1 of the Guidelines states that the recommended density ranges set by the guidelines should be applied in statutory Development Plans and when considering the density for a proposed development. Informed by this, we contend that the subject site falls within the category 'City – Urban Neighbourhoods', as detailed in Table 3.1 of the Guidelines:

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

This is based on the site's location within 'The Centre' neighbourhood of Tallaght (as prescribed by the LAP), its REGEN zoning and its proximity to public transport options to the north and east.

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

With respect to accessibility, the Guidelines refer to its Table 3.8 and remark that:

"...densities within the ranges set out will be acceptable, planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-density range at peripheral locations."

Thus, the better connected and more accessible a site, the higher the density should be. Having reviewed Table 3.8 in the Guidelines, we contend that the site falls within a defined 'High Capacity Public Transport Node or Interchange'²⁸ (the most 'accessible' type of location), due to its proximity to the node/interchange around the Tallaght Luas stop and the bus hub at The Square Shopping Centre. Combined, they result in a convergence of light rail and multiple bus services.

However, Table 3.8 explicitly and solely focuses on public transport. It does not consider the availability of, and proximity to, other services and amenities. On this very point, the Guidelines clearly state that: *"The characteristics detailed in Table 3.8 are not exhaustive and a local assessment will be required."* Therefore, consideration must go beyond just public transport, but to active modes and the availability of services and amenities within a proposed development and within its immediate environs (per the principles of the 15-minute city concept). Consequently, we refer the Council back to Section 2.3.4 above, wherein we have provided a detailed overview of such facilities, demonstrating their excellent quality.

In short, the following summarise the site with respect to connective and accessibility in terms of public transport, services and amenities:

- Excellent, high-capacity and high-frequency public transport infrastructure (Luas and bus) within the site's immediate environs (9-minute walk to the Luas and less than this for bus);
- The established and improving cycle infrastructure in the Tallaght area, including the site's immediate east at Whitestown Way;
- The wide range of services, facilities and amenities within the area surrounding the site (<15-minute walk); and
- The range of uses that the subject proposal includes.

These positive attributes all combine to warrant a density in the upper half of the 50–250 dph range.

In relation to character, amenity and natural environment, we have reviewed the site's location, description and context. We are of the opinion that none of the 'constraints' below apply to the site, which:

- Does not contain any Protected Structures;
- Is not within an Architectural Conservation Area;
- Does not contain any known archaeological features;
- Does not contain any protected species or habitats, including Natura 2000 sites;

²⁸ - Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor' stop. - Highest densities should be applied at the node or interchange and decrease with distance. - 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport

- Is a cleared site within an existing built-up area that can absorb development; and
- Is zoned REGEN with the planning intention for it to yield higher intensities/densities of development.

However, **it is constrained** by: (1) the Development Plan and LAP objective at the site requiring the delivery of part of the access road from Whitestown Way to Whitestown Road; (2) the LAP’s limitation on heights; and (3) the need to retain and enhance the existing landscaped verges, cycleways and footpaths. These constraints, **which are within the net site area**, ultimately reduce the developable site area. Consequently, they moderate the realisable density, despite there being no other ‘major’ character, amenity or natural environment constraints.

In light of the above, there is a practical, pragmatic and reasonable basis to pursue a density of development at the upper half of the 50–250 dph range (i.e. 150–250 dph). However, due to the limitations on the site’s developable area, this limited away from the very upper end of the range.

Drawing from the above, we have calculated the proposed development’s density using the methodology prescribed by the Compact Settlement Guidelines. This is detailed in Table 6.3 below and equates to 167.7 dph, thereby complying with the range for a site in this location and at this level of servicing.

Stage	Metric	Calculation	Total Site
A	Net Site Area		10,440.0 sq m
B	Total GFA	C+D	14,978.5 sq m
C	Residential GFA		14,457.4
D	Non-Residential GFA		521.1 sq m
E	Residential GFA as Proportion of Total GFA	C/B	96.5%
F	Pro Rata Site Area	AxE	10,078.8
G	Number of Dwellings		169
H	Net Residential Density (dph)	G/F/10000	167.7

Table 6.3: Residential Density of the Proposed Development

Source: Thornton O’Connor Town Planning (2025)

6.2.4.3 Density as Plot Ratio

However, we note that plot ratio is also a measure of density or intensity of development and more accurately reflects the physical scale or quantum of built-form at a site. These considerations appear to be of greater importance due to the LAP’s prescriptions in relation to height and plot ratio itself, rather than using dph. The LAP’s standards in respect of same are discussed in Section 6.2.3 above, where we robustly justify the appropriateness and quality of the proposed development’s 1.56:1 plot ratio.

6.2.4.4 Concluding Remarks on Density

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

6.3 Separation Distances and Protecting Privacy

The Development Plan stipulates a general minimum clearance distance of approximately 22 m between opposing windows. However, we recognise that the Compact Settlement Guidelines, as Section 28 Guidelines, establish SPPR 1 regarding separation distances, which takes precedence over the standard in the Development Plan. Thus it applies in its place.

The Compact Settlement Guidelines considers that the historic application of 22 m separation distances between opposing upper floor rear and side windows of habitable rooms does not account for modern methods of design and construction, the capability of assessing the appropriate level of daylight and sunlight being received by neighbouring dwellings, the level of privacy that can be obtained or policy's wider shift towards most dense and intense forms of development. In this regard, the Compact Settlement Guidelines state:

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

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

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

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

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

The closest existing residential development to the subject development is at the mixed-use The Arena to the north. As shown in the extracted image below (Figure 6.7), the closest point between the 2 No. buildings is 25.7 m, although this is only along a short section and increases to over 31.0 m farther west. Therefore, the scheme is compliant with the SPPR from an 'external' or 'impact' perspective. Additionally, the Design Team has presciently kept Block B away from the western boundary, with the building façade and balcony edges respectively 9.6 m and 8.0 m

from the boundary²⁹, thereby ensuring the future redevelopment of the Vita Actives site is not unduly prejudiced.

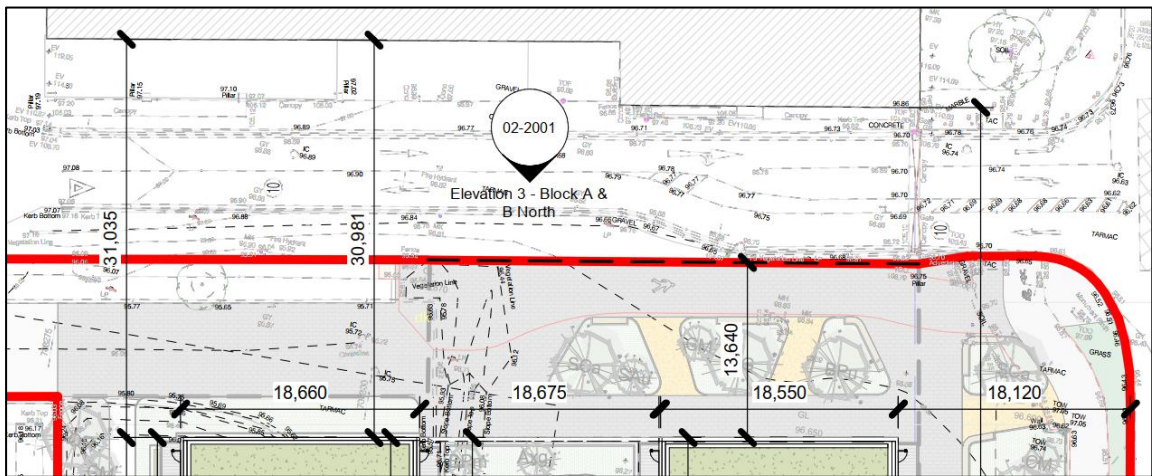


Figure 6.7: Separation distances between the proposed blocks and The Arena development to the north

Source: RAU (2026)

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

This is evident on RAU’s various site and floor plans drawings, and the *Proposed Site Plan* in particular. **As shown on that drawing, a separation distance between the block elevations of 18.7 m is achieved. This quantitatively exceeds SPPR 1’s minimum of 16 m, thereby ensuring compliance with same.** Further still, we note that the separation occurs across the intervening podium-level communal amenity space. This has the benefit of introducing some screening and visual variety by way of the proposed planting regimen, with its trees and shrubbery introducing visual cues and animation that further mitigate risks associated with overlooking or impacts on privacy.

Although the Planning Authority noted, in the *LRD Opinion*, a request to consider “...the design and positioning of upper-floor balconies... addressing any potential impacts on residential amenity, including overlooking of private amenity spaces...”, we note the following:

- SPPR 1 applies to opposing windows at above ground floor levels. It does **not** make any reference to opposing balconies. Therefore, the development applies with this requirement as a separation of 18.7 m have been achieved. We contend that if a minimum separation of 16 m was required from opposing balconies at above ground floor levels, the SPPR would have been worded accordingly.
- Notwithstanding the above, the balconies have been designed with depths of 1.5 m. Therefore, excluding the distance on 2 No. sides still leaves a separation of approximately 15.7 m between opposing balconies. Even if the 16 m separation was required between opposing balconies, the 0.3 m deviation is *de facto* compliance and it would be a fundamentally immaterial deviation of just 0.3 m or 1.8% of the requirement.

²⁹ The distance of 8 m being half of the 16 m minimum separation distance requirement, thus allowing a redevelopment project to the west to ‘mirror’ that proposed herein.

- Efforts have been made to stagger and step the balconies on the block facades so that they are not all opposing each other. While some do continue to do so, the variations in location reduce direct lines of sight and add interest to the building elevations.
- As noted above, the trees and shrubbery within the podium-level communal amenity space provide some screening as well as visual intrigue and animation to mitigate the perception of overlooking or impacts on privacy.

Consequently, the Applicant and Design Team are firmly of the opinion that the proposed development complies with SPPR 1's requirement for a minimum of 16 m separation distances between opposing windows at above ground floor levels, as well as the overall qualitative need to prevent overlooking and secure adequate privacy.

Notwithstanding the case made above, should the Planning Authority be of the opinion that greater privacy is necessary to the side of balconies, a condition could be attached to a Grant of Planning Permission requiring the addition of screens to the side of same.

6.4 Dwelling Mix

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

- "(A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.*
- (B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above."*

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

H1 Objective 12

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

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

Objective RE 2

"It is policy of the Council to ensure an appropriate housing mix is provided within the LAP lands, therefore a minimum of 30% of units within any new residential development (in the form of either apartments or houses but excluding student accommodation schemes) shall have a minimum of 3 bedrooms."

Therefore, no prescriptive residential dwelling mix applies to the subject site or the subject proposal.

The proposed dwelling mix by block is presented in Table 6.4. We contend that it complies with SPPR 1 and of note is that all 85 No. 2-bed units are designed with 4 No. bedspaces.

No. Beds	1 Bed	2 Bed	3 Bed	Total
Block A	32	36	2	70
Block B	48	49	2	99
Total	80	85	4	169
Dwelling Mix	47%	50%	2%	100%

Table 6.4: Proposed Dwelling Mix

(Source: RAU, 2026 and Thornton O'Connor Town Planning, 2026)

6.5 Dwelling Design and Amenity

The following sub-sections set out and assess several key dwelling design considerations, including internal floor areas (IFAs), private amenity space provision, aspect, floor-to-ceiling heights and internal storage provision. We note that the standards to be met are now principally informed by the content of the Apartment Design Guidelines adopted in 2025.

6.5.1 Internal Floor Areas

The IFA standards for apartments are set by SPPR 2 of the Apartment Design Guidelines, as follows:

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

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

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

With respect to unit design, layout and internal floor area, we direct the Council to the *Housing Quality Assessments* and various floor plan drawings prepared by RAU. These confirm that the relevant minimum IFAs are met or exceeded for all units.

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

"In the interests of delivering sustainable and good quality urban development, these Guidelines should be applied in a way that ensures a good mix of apartment sizes. Accordingly, at least 25% of units within a development shall exceed the minimum sizes set out in SPPR2 by 10%, with the potential for more than 25% of units to exceed the sizes set out in SPPR2 to be provided as required on a scheme-by-scheme basis in apartment schemes in more suburban locations, social housing developments, social and affordable housing delivered under Part V³⁰ and schemes to provide housing for older persons and/or persons with disabilities."

As evident in RAU's *Housing Quality Assessments*, 81 No. of the 169 No. proposed units exceed the minimum IFAs by at least 10%. This accounts for 48% of all units. Therefore, the proposed units are in compliance with the minimum IFAs of SPPR 2 and the supporting guidance quoted above.

An example of a unit markedly exceeding the minimum requirements is the Type 1 universally designed unit typology. As a 1-bed, 2-person unit, an IFA of at least 45 sq m is required. However, these are designed as 61.5 sq m – i.e. 16.5 sq m or 37% larger than the minimum.

Positively, the large number of units exceeding the minimum requirements and the extent of these exceedances will support the delivery of attractive, high-quality internal living environments for future residents.

6.5.2 Private Amenity Space

In relation to the provision of private amenity space for units, the area requirements of the Apartment Design Guidelines apply. The requirements for the proposed apartments are shown in Table 6.5 below.

Unit Size	Private Amenity Space Standard Per Unit
1-Bed	5 sq m
2-Bed (4-Person)	7 sq m
3-Bed (4-Person)	6 sq m

Table 6.5: Minimum Private Amenity Space Requirements for Apartment Dwellings

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

The areas proposed for each unit are presented in the *Housing Quality Assessments* and on the various unit drawings prepared by RAU. As is evident, the minimum requirements of the Guidelines are matched or exceeded in all cases. In fact, there are instances where rates of provision are comfortably exceeded, thereby enhancing the residential amenity of dwellings for future occupants. Examples include the Type 1 1-bed, 2-person universally design units at ground floor level of Block B and the Type 3 2-bed, 4-person units at multiple levels of Block A.

The delivery of the private amenity spaces varies slightly in that some of the balconies are stacked vertically and others are staggered/stepped. These differences introduce elevation interest and prevent monotony, which have aesthetic design benefits. However, they also create a varied amenity environment, enhancing privacy and shifting away from uniform balcony/terrace provision.

³⁰ "Or part VII of the Planning and Development Act 2024, once commenced."

In accordance with the Guidelines, the private amenity spaces are proposed as terraces at podium and ground floor levels, and as balconies elsewhere. Depths of these spaces in excess of 1.5 m (minimum required) have been achieved to ensure they are appropriately sized and usable. Landscaping softens the edges between private and communal amenity spaces / public realm, providing a buffer and a sense of defensible space for residents. Details of these 'soft interfaces' are presented in Mitchell + Associates suite of landscape materials and we provide an extract example showing this on the west side of Block B in Figure 6.8 below.



Figure 6.8: Extract from the *Landscape Masterplan*, showing the ornamental shrub / herbaceous mix planting and a 1.2 m high hedge defining the

(Source: Mitchell + Associates' *Landscape Masterplan*, 2026)

6.5.3 Aspect

Of the 169 No. proposed residential units, 66 No. are dual aspect; equivalent to 39%.

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

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

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

No single aspect north-facing units are proposed.

Further identification of the benefitting units is presented in RAU's *Design Statement* and on the suite of submitted drawings.

6.5.4 Floor-to-Ceiling Heights

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

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

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

As detailed in the drawings prepared by RAU, the floor-to-ceiling heights of the apartments:

- At ground floor level exceed the minimum of 2.7 m, with internal heights of 3.2 m; and
- At above ground floor level exceed 2.4 m, with internal heights of 2.6 m.

Please refer to RAU's drawings titled:

- GA Section AA - GA Section BB
- GA Section CC

These design outcomes achieve a higher quality living environment for future residents, with greater natural ventilation and light ingress. Aside from these more 'quantitative' aspects, they also create dwellings that 'feel' – from a qualitative perspective – more airy, spacious and hospitable, rather than cramped or confined.

6.5.5 Storage

In relation to the provision of internal storage in units, instruction is again taken from the Apartment Design Guidelines. Its minimum requirements for the proposed unit types and sizes are shown in Table 6.6 below, with the following additional guidance provided:

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

Unit Size	Storage Requirement Per Unit
1-Bed	3 sq m
2-Bed (4-Person)	6 sq m
3-Bed (4-Person)	6 sq m

Table 6.6: Minimum Storage Space Requirements for the Proposed Apartments

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

The proposed storage areas for each of the units are presented in the *Housing Quality Assessments* and on the various unit drawings prepared by RAU. As is evident, the minimum requirements of the Guidelines are matched or exceeded in all cases. As shown on the various floor plans, no single storage room/space exceeds 3.5 sq m and all areas are calculated without heat pumps or other vital infrastructure.

6.5.6 Daylight and Sunlight

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

- Daylight (Spatial Daylight Autonomy (SDA)) (431 No. rooms assessed in 169 No. units) –
 - 94% of rooms compliant "without trees".
 - 94% of rooms compliant "with trees".
- Sunlight (Sunlight Exposure (SE)) (169 No. units assessed) –
 - 93% of units compliant "without deciduous trees".
 - 91% of units compliant "with trees as opaque objects".

There are excellent rates of compliance, and demonstrative of the development's overall quality.

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

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

We also note the pragmatic and practical guidance provided by the Compact Settlements Guidelines, which states the following:

"In drawing conclusions in relation to daylight performance, planning authorities must weigh up the overall quality of the design and layout of the scheme and the measures proposed to maximise daylight provision, against the location of the site and the general presumption in favour of increased scales of urban residential development. Poor performance may arise due to design constraints associated with the site or location and there is a need to balance that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution."

Therefore, the Guide is just that – a guide – and not a standard against which a development must slavishly and absolutely comply. The need for flexibility and an evident acceptance of poorer performing units feature in the Compact Settlements Guidelines when broader objectives can be achieved. Overall, it is considered that the proposed development will result in a series of high-quality and attractive living spaces for future residents.

6.5.7 Units Per Core

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

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

6.6 Open Space

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

The following sub-sections in relation to open space and landscaping should be read in conjunction with the materials prepared by Mitchell + Associates.

6.6.1 Public Open Space

Table 12.22 of the Development Plan defines the minimum public open space standards in the County (Table 6.7 below).

Land Use	Minimum Public Open Space Standards
Overall Standard	2.4 Ha per 1,000 population
New Residential Development on Lands Zoned RES-N	15% of the site area
New Residential Development on Lands in Other Zones Including Mixed Use	10% of the site area
Institutional Lands / ‘Windfall’ Sites	20% of the site area

Table 6.7: Minimum Public Open Space Standards

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

Moreover, the LAP states that:

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

Informed by the above, the proposed development provides a total of 2,444 sq m of public open space in 2 No. specific areas. This combined area accounts for 18.4% of the gross site area (13,270 sq m / 1.32 Ha). Whilst this exceeds the minimum requirement, we contend that its application against the gross site is not a true reflection of the scale of the space, as portions of the site are not developable as they relate to roads, verges, etc. to facilitate road upgrades, water infrastructure and landscaping beyond the main developable site area.

Therefore, we are of the opinion that the net development site (10,440 sq m / 1.04 Ha)³¹ is the more appropriate area to be used for calculating public open space. In fact, this approach aligns with Policy and Objective 5.1 (Public Open Space) of the Compact Settlement Guidelines:

*"It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of **net site area** and not more than a minimum of 15% of **net site area** save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.*

In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.

In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.

In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site."

Therefore, using net site area as the base metric results in a public open space rate of 23.4%. **Ultimately, in both scenarios, the minimum standards are exceeded.**

In terms of the design of the public open spaces, we have tabulated key aspects to demonstrate that they not only comply with quantitative standards, but also meet and exceed the Council's qualitative expectations (Table 6.8).

Detail	Main POS (Figure 6.9)	Arrival POS
Location	Along an east-west axis parallel to the new access street at the south.	At the site's frontage to Whitestown Way to the south-east.
Area	2,130 sq m	314 sq m
Key Design Features	<ul style="list-style-type: none"> • Play features. • Detailed planting regimen. 	<ul style="list-style-type: none"> • Arrival space from the south-east. • Gentle interface with the crèche play space. • Seating.

³¹ Refer to Section 4.1 in relation to the definition of gross and net site areas as they are considered for this stage of the Planning Application process.

Detail	Main POS (Figure 6.9)	Arrival POS
	<ul style="list-style-type: none"> Incorporation of the attenuation basin to provide SuDS. Large lawned area, thereby allowing for use as kick-about space and active recreation. 	<ul style="list-style-type: none"> Visitor / short-stay cycle parking. Detailed planting regimen.
Play	A total of 10 No. LEAP pieces of equipment in a trail layout looping through and around the attenuation basin, creating an activated and legible open space, with features sited away from the public road.	None provided in this location.
Planting Regimen	<ul style="list-style-type: none"> Tree planting. Grass / lawn amenity. Bulb mix. Woodland edge mix. Ornamental shrub / herbaceous planting mix. 	<ul style="list-style-type: none"> Tree planting. Ornamental shrub / herbaceous planting mix. Hedge planting.
Tree Species	<ul style="list-style-type: none"> <i>Pinus sylvestris</i> (Scots Pine) <i>Quercus robur</i> (Pedunculate Oak) <i>Betula pubescens</i> (Downy Birch) <i>Alnus glutinosa</i> (Common Alder) <i>Crataegus monogyna</i> (Hawthorn) <i>Amelanchier arborea</i> (Serviceberry) 	<ul style="list-style-type: none"> <i>Alnus glutinosa</i> (Common Alder) <i>Betula pubescens</i> (Downy Birch) <i>Crataegus monogyna</i> (Hawthorn) <i>Sorbus aucuparia</i> (Rowan) <i>Amelanchier arborea</i> (Serviceberry)
Passive Surveillance	Yes, from dwellings in Block B and passersby using the street to the south.	Yes, from dwellings in Blocks A and B, persons in the crèche and passersby using the street to the south and Whitestown Way to the east.
Buffer Around Private Amenity	Not applicable, as no direct interface with terraces of dwellings.	Not applicable, as no direct interface with terraces of dwellings.
Sunlight	99.92% of the open space receiving at least 2 hours of direct sunlight across its area on 21 st March, thereby <u>markedly</u> exceeding the minimum compliance target of 50% of the area.	99.39% of the open space receiving at least 2 hours of direct sunlight across its area on 21 st March, thereby <u>markedly</u> exceeding the minimum compliance target of 50% of the area.

Table 6.8: Summary Qualitative Aspects of the Proposed Public Open Space

(Source: Collated By Thornton O'Connor Town Planning, 2026)



Figure 6.9: Main public open space along the site’s southern extent

Source: 3D Design Bureau (2026)

Evidently, the proposed public open space strategy exceeds the minimum area requirement prescribed by both the Development Plan and the LAP. Furthermore, we contend that the design is of a high-quality with its: usability and functionality; shape, location and layout; incorporation of native and non-native species, which create seasonal variations; ability to be passively surveilled; and inclusion of play features.

6.6.2 Communal Amenity Space

In addition to public open space, the Apartment Design Guidelines prescribe a need for communal amenity space for apartment units, which can be delivered in a variety of different or combined forms. The relevant standards and how they apply to the proposed dwelling mix are presented in Table 6.9 below.

Detail	1 Bed	2 Bed (4 Person)	3 Bed (4 Person)	Total
No. Units	80	85	4	169
CAS Standard (sq m)	5	7	7	-
CAS Required (sq m)	400	595	28	1,023

Table 6.9: Minimum Communal Amenity Space Standards for Apartment Dwellings

(Source: *Planning Design Standards for Apartments – Guidelines for Planning Authorities, 2025* and Thornton O’Connor Town Planning, 2026)

As shown, a requirement for a total of 1,023 sq m of communal amenity space arises based on the total and mix of dwellings. The quantitative requirement is exceeded by 162 sq m or 15.8% with the provision of 1,185 sq m of such space between the 2 No. blocks at podium level atop the undercroft car park.



Figure 6.10: Communal amenity space atop the podium between the 2 No. blocks

Source: 3D Design Bureau (2026)

Focusing on the qualitative design aspects of the communal amenity space, we have collated key details in Table 6.10 below. Combining these, and considering the space's exceedance of the minimum area requirement, we are firmly of the opinion that it complies with the requirements and expectations of the Apartment Design Guidelines, as well as the Development Plan.

Detail	Aspect of the Design
Location	Between Blocks A and B at podium level atop the car parking area.
Area	1,185 sq m
Key Design Features	<ul style="list-style-type: none"> • Amenity lawned areas, allowing for active recreation and amenity. • Play features. • Seating. • Detailed planting regimen.
Play	Yes, as formal and informal play features in 5 No. distinct areas placed away from terraces and windows.
Planting Regimen	<ul style="list-style-type: none"> • Tree planting. • Grassed lawns. • Ornamental shrub / herbaceous planting mix.
Tree Species	<ul style="list-style-type: none"> • <i>Amelanchier x grandiflora</i> (Serviceberry variant) • <i>Betula pendula</i> (Silver Birch) • <i>Cercis canadensis</i> (Eastern Redbud) • <i>Malus sylvestris</i> (Crab Apple)
Passive Surveillance	Yes, from dwellings within both Blocks A and B.
Buffer Around Private Amenity	Yes, as ornamental shrub / herbaceous planting mix placed around terraces present at-grade with the communal amenity space.
Sunlight	97.42% of the open space receiving at least 2 hours of direct sunlight across its area on 21 st March, thereby <u>markedly</u>

Detail	Aspect of the Design
	exceeding the minimum compliance target of 50% of the area.

Table 6.10: Summary Qualitative Aspects of the Proposed Communal Amenity Space

(Source: Collated By Thornton O'Connor Town Planning, 2026)

6.6.3 Private Open Space

Please refer to Section 6.5.2 above for further details.

6.7 Parking

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

6.7.1 Car Parking

6.7.1.1 Residential Car Parking

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

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

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

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

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

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

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

This is based on the site's location within 'The Centre' neighbourhood of Tallaght (as prescribed by the LAP), its REGEN zoning and its proximity to public transport options to the north (refer to Section 2 above).

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

The maximum car parking provision for the proposed development would, therefore, be 169 No. spaces (for the residential development) based on the proposed number of dwellings. However, as stated in Section 5.3.4 of the *Compact Settlements Guidelines*, car parking ratios "...should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport". This same policy position is held by the Apartment Design Guidelines: "...in cities and towns that may be suitable for apartment development, car parking ratios should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport."

We also note Policy SM7 (Car Parking and EV Charging) of the Development Plan as stating:

*"Implement a balanced approach to the provision of car parking with the **aim of using parking as a demand management measure to promote a transition towards more sustainable forms of transportation**, while meeting the needs of businesses and communities." [emphasis added]*

Evidently, the Council sees a **reduction in the provision or availability of car parking as a means through which to encourage the use of active and public modes of transport.** The approach to modal management applies the principle of pushing people towards sustainable modes by limiting the ease of owning and using a car. This makes sustainable modes comparably more attractive – and by extension – safer, quicker and even more attractive by taking private vehicles off the road and by increasing the range, capacity, frequency and quality of services.

As identified above, the subject site is highly accessible given its proximity to the Tallaght Luas Stop, various bus stops, services and facilities, and employment opportunities at The Square Shopping Centre and various industrial estates. These attributes are all discussed in detail in Section 2.0 above, and thus, are not repeated here.

However, their range and quality allow us to form the professional planning opinion that the subject scheme, by virtue of its 'urban neighbourhood' location and its classification within a 'High Capacity Public Transport Node or Interchange', appropriately establishes an opportunity for car parking provision to be "substantially reduced" for the residential uses, in accordance with SPPR 3.

Thus, the development proposes 69 No. car parking spaces for the residential units, equating to a residential car parking ratio of 0.41 No. spaces dwelling^{32, 33}. This is a progressive rate of car parking provision that responds to planning and mobility policy, and is reflective of the site’s location, public transport services and the availability of a host of locally available services, facilities and amenities.

6.7.1.2 Non-Residential Car Parking

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

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

Use	Floor Area (sq m)	Standard	Max. No. Spaces
Crèche	162.8	0.5 per classroom	2
Retail	356.6	1 per 25 sq m	14.3
Total	519.3		16.3³⁴

Table 6.11: Maximum Non-Residential Parking Standards for Zone 2 based on the mix of uses

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

It is proposed to provide a total of 8 No. car parking spaces for the non-residential uses. These are those spaces proposed externally along the new street to the south. This is less than the maximum and considered appropriate due to the need to adequately cater for the requirement of the childcare facility and to support the operational viability of the 2 No. retail/commercial units.

Whilst this is a reduced rate of car parking, we note that an additional set-down bay (now totalling 2 No. on-site) has been proposed. Additionally, in respect of the nearby Reg. Ref. LRD25A/0009W development at Belgard Square East, zero car parking spaces were provided for the non-residential uses.

The parking will be sufficient to encourage the use of active modes, which is important to be cognisant of in the context of the anticipated ‘local’ land-uses proposed, whilst balancing the need to meet certain mobility needs and preferences.

6.7.1.3 EV Charging and Accessible Parking Spaces

Regarding electric vehicle (EV) charging, the Development Plan states that it shall be provided in all residential, mixed-use and commercial developments and at a minimum of 20% of the total

³² An increase on the LRD Meeting stage ratio of 0.37.

³³ We note this is above the rate of 0.29 initially permitted by the Planning Authority under Reg. Ref. LRD25A/0009W at Belgard Square East, prior to its appeal to An Coimisiún Pleanála. However, that scheme is more centrally located within Tallaght than the subject proposal. Therefore, the higher car parking ratio of the subject scheme is reflective of its site’s slightly less central position.

³⁴ Assumes 4 No. classrooms / care rooms in the crèche.

parking spaces provided. Thus, it is confirmed that 20% of all spaces will be fitted with EV charging infrastructure in accordance with the Development Plan. The remaining spaces will be ducted to accommodate future upgrades to full EV charging status.

Accessible parking spaces have also been considered and feature as 3 No. for the residential uses (located at the entrance to the undercroft) and 2 No. for the non-residential uses (along the new street to the south).

6.7.1.4 Set-Down Bays

Additionally, 2 No. set-down bays capable of accommodating the equivalent of 2 No. cars/taxis, 2 No. small vans or 1 No. long-wheelbase van are proposed along the new road at the southern extent of the site. This will allow for food deliveries, post deliveries, taxi collections and drop-offs and commercial loadings and collections. Importantly, the bays are proximate to the crèche facility, making it easier for parents and guardians to collect and drop-off children.

Beneficially, these bays will ensure that vehicles carrying out these functions can arrive and depart easily, will not block the carriageway and will not need to mount and block footpaths and cycle tracks.

6.7.2 Cycle Parking

6.7.2.1 Residential Cycle Parking

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

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

The following requirements for cycle parking and storage are recommended:

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

This equates to 1 No. space per bedroom for residents. The visitor parking provision is not quantitatively defined; however, we have applied the standard of 1 No. space per 2 No. units as prescribed by the previous iteration of the Apartment Design Guidelines (2023). Based on the proposed dwelling mix (Section 6.4) **this equates to a requirement for 262 No. cycle parking spaces for residents and 85 No. spaces for visitors (Table 6.12).**

		1-bed	2-bed	3-bed	Total
No. Units	Block A	32	36	2	70
	Block B	48	49	2	99
	Total	80	85	4	169
Cycle Parking Standard	Resident (Spaces per Unit)	1	2	3	-
	Visitor Cycle Parking Standard	0.5	0.5	0.5	-
Cycle Parking Requirement	Resident (Spaces per Unit)	80	170	12	262
	Visitor Cycle Parking Standard	40	43	2	85
	Total	120	213	14	347

Table 6.12: Cycle parking standards and requirements for residents of the proposed development

Source: *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024)* and Thornton O'Connor Town Planning (2026)

6.7.2.2 Non-Residential Cycle Parking

With respect to cycle parking for the non-residential uses, it is noted that different standards apply for different uses. Table 12.23 of the Development Plan defines these and we combine them with the proposed uses to calculate the minimum requirement for the scheme in Table 6.13 below. As is shown, 4 No. long-stay and 11 No. short-stay spaces are required.

Use	Floor Area (sq m)	Long Stay Standard	Long Stay Requirement	Short Stay Standard	Short Stay Requirement	Note
Crèche	162.8	1 per 5 staff	1.3	1 per 10 child	3.3	Footnote 35
2 No. class 1 / class 2 commercial units	356.5	1 per 5 staff	2.5	1 per 50 sq m	7.1	Footnote 36
Total			3.8		10.4	
Total Rounded	519.3		4		11	

Table 6.13: Minimum Cycle Parking Standards for the Crèche and Retail/Commercial Uses

(Source: *South Dublin County Development Plan 2022–2028* and Thornton O'Connor Town Planning (2026))

6.7.2.3 Proposed Cycle Parking

In order to comply with the minimum requirements calculated above, the development proposes 370 No. cycle parking spaces, with 270 No. as long-stay for residents and staff and 100 No. as short-stay for visitors and patrons (Table 6.14). These rates of provision exceed the minima by 4 No. and 4 No. respectively.

³⁵ Assumes 33 No. children enrolled and 6.6 No. staff as an average based a pro rata enrolment rate of 0–6 year old children.

³⁶ Retail use applied in order to define a standard. 70% gross area as net, with 1 No. staff per 20 sq m net. Informed by the Homes & Communities Agency's (UK) *Employment Density Guide 2015 (3rd Edition)*.

Required	Long Stay	Short Stay	Total
Residential	262	85	347
Non-Residential	4	11	15
Total	266	96	362

Provided	Long Stay	Short Stay	Total
Residential	270	100	370
Non-Residential			
Exceedance	+4	+4	+8

Table 6.14: Required and provided cycle parking for the proposed uses

Source: *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024), South Dublin County Development Plan 2022-2028 and Thornton O'Connor Town Planning (2026)*

The locations of the residents and staff cycle spaces are in 4 No. areas within the undercroft / car parking area at ground floor level. These are safe and secure locations, accessible only by residents and staff via key, fob, code or near field communication (NFC) app. These stores will be monitored by CCTV and managed and maintained by the on-site management entity.

Short-stay spaces for visitors, guests and patrons are provided as Sheffield stands at street level and benefit from passive surveillance in all instances. Please see the accompanying drawings prepared by RAU and Mitchell + Associates for specific cycle parking details and layouts.

To broaden the range of cycle parking options available, noting the guidance in the *Cycle Design Manual (2023)*, 4 No. of the long-stay and 4 No. of the short-stay spaces have been designed for cargo and alternative cycle typologies.

6.8 Surface Water Management and SuDS

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

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

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

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

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

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

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

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

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

In light of these provisions and in accordance with best practice and the overall benefit of the proposed development, a series of SuDS measures are incorporated into the development to appropriately manage surface water. DBFL’s strategy has been to:

- *“Attenuate storm-water runoff.*
- *Reduce storm-water runoff.*
- *Reduce pollution impact.*
- *Replicate the natural characteristics of rainfall runoff for the site.*
- *Recharge the groundwater profile.”*

The various SuDS are discussed in detail in DBFL’s *Infrastructure Design Report* and suite of drawings submitted herewith, and combine to achieve the Council’s objectives of water quality, water quantity, amenity and biodiversity. The measures proposed include:

- Swales (242 sq m);
- Green roofs (1,850 sq m);
- Filter drains;
- Permeable paving (1,930 sq m); and
- Detention basin (1,100 sq m).

The SuDS measures are considered to be those most appropriate for the site, and positively and progressively include nature-based elements that align with the Council’s efforts to support ecology and biodiversity and the delivery of green infrastructure. Therefore, they are not just engineering ‘solutions’ to address surface water, but carefully considered multi-functional, multi-purpose aspects of the proposed development.

6.9 Flood Risk

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

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

“To require site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12 / 2014

and the EU Floods Directive and Chapter 12: Implementation and Monitoring and the policies and objectives of this chapter.”

Accordingly, a *Site Specific Flood Risk Assessment* has been prepared by DBFL and is submitted herewith. As discussed in Section 5.5 above, its preparation has been undertaken based on the guidance in *The Planning System and Flood Risk Management: Guidelines for Planning Authorities* (2009). The objectives of the Guidelines are stated as being to:

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

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

“The Site-Specific Flood Risk Assessment for the proposed development was undertaken in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities, November 2009.

It is concluded that;

- *Following the flood risk assessment stages, it was determined that the majority of the subject site, and all areas where buildings are proposed are within Flood Zone C, and at a low risk of fluvial flooding. A small portion of the proposed road in the southeastern area of the site may be within Flood Zone A and B due to flooding from the Whitestown Stream. A Justification Test for the development has been applied and passed for the portion of the development within Flood Zone A and B.*
- *The proposed development will not increase runoff rates when compared with the existing site and satisfies the requirement of the SFRA to reduce flooding and improve water quality.*
- *A possible source of flood risk from the surcharging or blockage of the development’s drainage systems has been identified. This risk is mitigated by suitable design of the drainage network, regular maintenance and inspection of the network and establishment of exceedance overland flow routes.*

In conclusion, the proposed development is considered to be in compliance with The Planning System and Flood Risk Management Guidelines for Planning Authorities.”

6.10 Part V

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

To comply with the Part V requirements of the *Planning and Development Act 2000* (as amended), we firstly note that the 20% minimum Part V contribution applies. Consequently, a total of 34 No. units (20.1% of total units) are proposed for transfer/sale to the Council. These include 18 No. 1-bed, 14 No. 2-bed and 2 No. 3-bed units, which are identified on the drawings listed below and enclosed. Costings are also provided.

Please refer to the following enclosures which meet the statutory Planning Application-stage Part V proposal requirements:

- Drawings prepared by RAU –
 - *Proposed Ground Floor Plan Part V*
 - *Proposed First Floor Plan Part V*
 - *Proposed Second Floor Plan Part V*
- *Accommodation Schedule Part V* prepared by RAU.
- Part V costings sheet, prepared by the Applicant.

A submission was made to the Housing Department of SDCC via e-mail in May 2026 to agree the principle of the above Part V proposal and to seek a letter confirming or validating same. As of the day of submitting this Planning Application, no response has been received. We note that such a letter is **not** a statutory requirement of a Planning Application³⁷.

6.11 Road Objective

As shown below in Figure 6.11, the LAP includes an objective to provide a signalised junction at the north-eastern corner (i.e. at Whitestown Way) of the subject site with a new road tying into the existing Whitestown Road to the west³⁸.

³⁷ Part V statutory requirements per legislation summarised as follows: (1) how the Part V obligation will be met, (2) what units are proposed and where are they located, and (3) what are the costs involved.

³⁸ A similar roads objective features in the Development Plan.

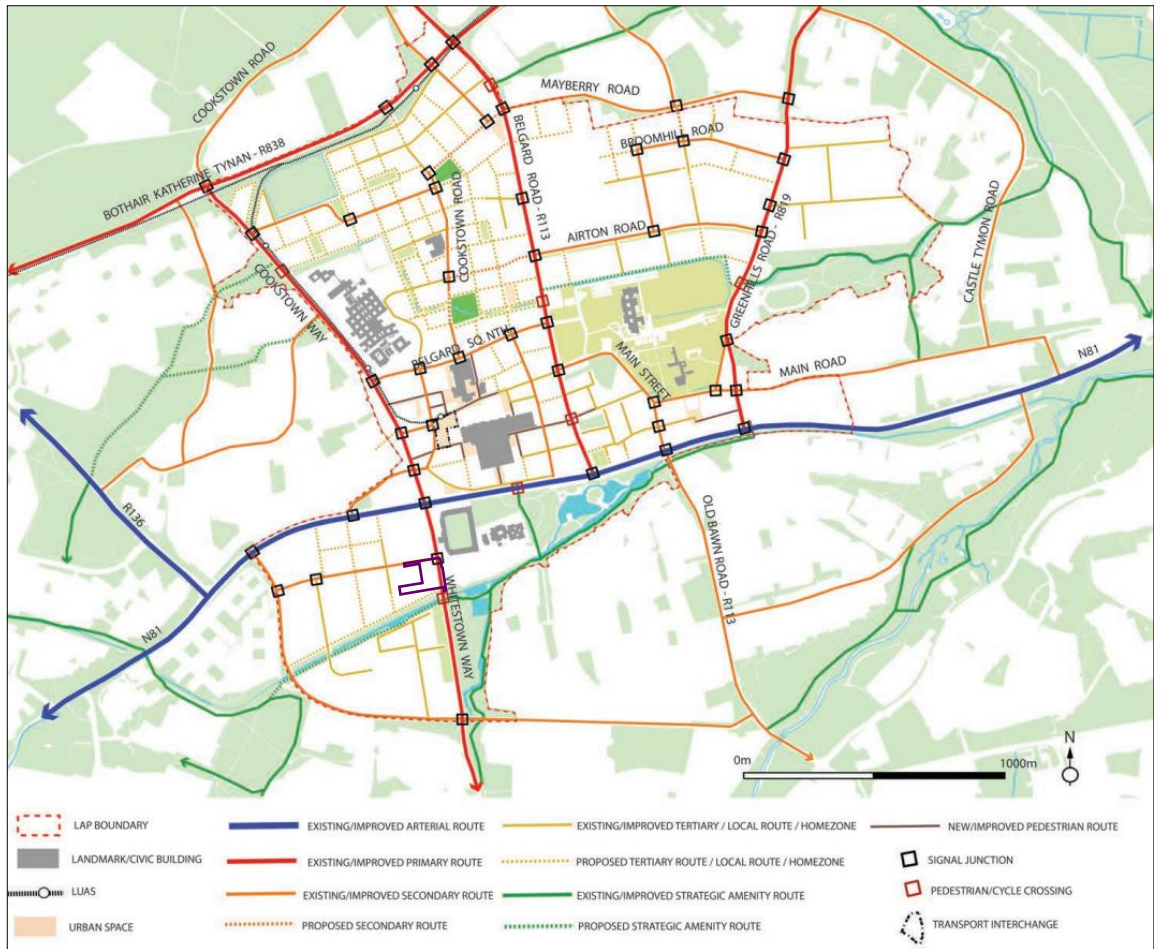


Figure 6.11: Road Structure Map Highlighting the Road Objective at the Subject Site (Indicative Boundary Outlined in Purple)

(Source: **Tallaght Town Centre Local Area Plan 2020 – Figure 2.1, Annotated By Thornton O’Connor Town Planning, 2026)**

However, as discussed and agreed with SDCC during the Section 247 PPCs and Section 32C LRD Meeting, it is not feasible to deliver a signalised junction at this location due to its close proximity to the existing vehicular entrance serving The Arena and the configuration of that development. Therefore, it is proposed to provide a shared surface for pedestrians and cyclists at this location, with a junction proposed to instead be delivered at the south-eastern corner of the subject site. The Council is referred to the enclosed *Road Layout* drawing and *Traffic and Transport Assessment Report* prepared by DBFL for full details.

The junction will serve as a new access street running along the southern edge of the site up to the boundary of same interfacing with Third-Party lands, which are beyond the control of the Applicant.

The proposal ensures that neither the development of those lands to the west nor the completion of the access road are prejudiced.

6.12 Ecology and Environment

The increasing importance of ecological and environmental protection has meant that they have been considered throughout the design process. In light of same, OCSC has prepared an

Ecological Impact Assessment Report (EcIA), an AA Screening Report and an EIA [Environmental Impact Assessment] Screening Report.

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

6.12.1 Ecology

With respect to ecology on-site and within the defined zone of influence, OCSC has prepared an EcIA. Although we direct the Council to this separate report, the author proceeded to conclude that:

"The site for assessment is the proposed Large Scale Residential Development at Whitestown Way, Tallaght, Dublin 24. The works include: the construction of 169 residential units across 2 apartment blocks, 356.5sqm of commercial areas across two units, a creche (162.8 sqm) open space, a new road at the site's south, connecting Whitestown Way (east), car and bicycle parking spaces all on a c. 1.32 ha site.

The report has identified the baseline ecological status of the site along with ensuring compliance with relevant national and European statutory requirements to guarantee that works will not negatively impact environmental receptors.

It is anticipated that the proposed works have the potential to negatively impact on the immediate surrounding environment. Potential concerns arising from the works include:

- *Temporary disturbance of bird species due to the clearance of vegetation.*
- *Disturbance of European Hedgehogs due to the clearance of vegetation.*
- *Disturbance of Amphibian species due to the clearance of vegetation.*

*There will be a permanent loss of some habitat within the site, but as these are commonly occurring and widespread habitats within the area, the loss will not be significant. The proposed works are likely to impact birds, hedgehogs and amphibians which may be using the site. However, implementation of mitigation measures outlined in section 7 will reduce the likelihood and magnitude of these impacts. **Given the nature of the development, its scale, and the localised and temporary nature of the construction effects identified as potential sources, it is concluded that, subject to implementation of recommended mitigation measures, the proposed project is not foreseen to give rise to any significant adverse effects on any designated European sites, nationally designated sites, and local habitats, alone or in combination with other plans or projects.** [emphasis added]*

6.12.2 Natura 2000 Sites

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

"To ensure that planning permission will only be granted for a development proposal that, either individually or in combination with existing and / or proposed plans or projects, will not have a significant adverse effect on a European Site, or where such a development proposal is likely or might have such a significant adverse effect (either alone or in combination), the planning authority will, as required by law, carry out an appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92 / 43 / EEC of the 21 May 1992 on the

conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the development proposal will not adversely affect the integrity of any European site, will the planning authority agree to the development and impose appropriate mitigation measures in the form of planning conditions. A development proposal which could adversely affect the integrity of a European site may only be permitted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation.”

The AA Screening Report concluded the following:

“The Habitats Directive provides legal protection for habitats and species of European importance and establishes the requirement for an AA. This AA screening is based on best scientific knowledge and has utilised ecological and hydrological expertise. In addition, a detailed online review of published scientific literature and ‘grey’ literature was conducted.

This AA screening has been prepared for the proposed Large Scale Residential Development at Whitestown Way, Tallaght, Dublin 24. There is no spatial overlap between the study area and any Natura Site. The closest Natura site is the Glenasmole Valley SAC (001209) located 2.58km south of the site. Due to the lack of spatial overlap between the site and Glenasmole Valley SAC, the lack of a hydrological connection, and the scale and nature of the proposed works the impacts to Natura sites are predicted to be unlikely and negligible. No other Natura 2000 sites located within the 5km zone of impact of the site will be impacted by the proposed works.

No changes are predicted to occur at any designated sites which may result in effects on the conservation objectives of those sites with regard to the following:

- *habitat or species fragmentation*
- *climate change*
- *disturbance to key species*
- *reduction in species density*
- *changes in key indicators of conservation value*
- *reduction of habitat area...*

This stage 1 screening for AA of the Large Scale Residential Development at Whitestown Way, Tallaght, Dublin 24 has considered potential effects which may arise during the construction and operational phases as a result of the implementation of the project.

The AA screening process has considered potential effects which may arise during the construction and operational phases. Through an assessment of the pathways for effects and an evaluation of the project characteristics, taking into account the processes involved and the distance of separation from European sites, it has been evaluated that the works are unlikely to impact these sites in terms of adverse effects on their qualifying interests, special conservation interests, or conservation objectives.

*This evaluation is made in view of the conservation objectives of the habitats or species for which these sites have been designated. Consequently, a Stage Two Appropriate Assessment is **not** required for the project.” **[emphasis original]***

6.12.3 Environmental Impact

With respect to environmental impacts, OCSC has undertaken a detailed screening exercise in the enclosed *EIA Screening Report*. This report is available for inspection under separate cover

and aids the Council in the undertaking of their own screening exercises, per Section 12.3.3 of the Development Plan. The report concludes:

"This EIA screening process has considered potential effects which may arise during the construction and operational phases as a result of the development of the proposed LRD project at Whitestown Way, Tallaght, Dublin 24, Co. Dublin. Based on the duration, nature, and scale of the proposed construction of a residential, communal and commercial development, it is predicted that the overall impact on the receiving environment is likely to be short term; slight, and negative during the construction phase subject to implementation of all mitigation measures detailed in the CEMP. Due to the generation of housing and employment in the area, it is predicted that the operations phase will result in permanent, slight, positive impacts. In addition, an AA Screening Report and an Ecological Impact Assessment Report prepared by OCSC concluded that the proposed project is not likely to give rise to adverse effects on any designated European sites, alone or in combination with other plans or projects.

Based on this assessment, the preparation of an EIA is not recommended for the Proposed Development. However, the final determination with regard to the need for an EIA will be undertaken by the competent authority."

Supplementary and complementary to the EIA Screening Report, OCSC prepared a *Statement In Accordance With Article 103(1a)A Of The Planning And Development Regulations 2001, As Amended*. The statement concluded that:

"...in conjunction with the EIA Screening, [it] has determined that, by reason of the nature, scale and location of the Proposed Development site, and the proposed mitigation measures outlined in the other assessments completed for this planning application, the Proposed Development does not require a mandatory Environmental Impact Assessment Report (EIAR)."

7.0 CONCLUSION

Overall, it is considered that the proposal represents an appropriate and attractive design solution at the subject site, with modulation provided throughout the scheme to reflect its surrounding context, whilst presenting a robust, mixed-use frontage onto Whitestown Way. Importantly, it will finally realise the potential of the vacant infill site that currently fails to provide economic, architectural or aesthetic benefits to the local area.

The site's location adjacent to an established Town Centre has been recognised. In this context, the new development is an appropriately scaled scheme that progressively, but respectfully, increases residential densities and building heights in accordance with the principles of compact growth and sustainable land-use, but also the explicit parameters of the LAP. Its careful design ensures that the proposal can be assimilated into its receiving environment, moderating its height relative to The Arena, which is the defining structure at the juncture of Whitestown Way and the N81.

Importantly, the mixed-use development includes a range and quantum of uses at ground floor level which complies with the objectives of the Development Plan and the LAP guidance with respect to the site.

We trust that the detail provided in this report and the supporting, enclosed materials will allow the Council to undertake a detailed assessment and to reach an ultimate decision to Grant Planning Permission. Should you require additional insights at this juncture, please do not hesitate to contact the undersigned.

Yours faithfully,



Patricia Thornton
Director
Thornton O'Connor Town Planning

APPENDIX A – PROOF OF PLANNING FEE PAYMENT

Payment Details

Payment Reference No. 242159488

Printed On
Wednesday, May 20, 2026
02:08:22 PM

Pay From > ARP 4 2 , LOWER BAGGOT ST DUBLIN 2 , 40112760

Pay To > SOUTH DUBLIN COUNTY COUNCIL GENERAL ,
IBANIE14AIBK93331731000029

Payment Details > €25,708.96 on 20/05/2026, SEPA Payment

Payment Currency:	EUR
Payment Type:	Standard
Payment Amount:	25,708.96
Payment Date:	20/05/2026
End to End Reference:	WHITESTOWNWAYLRD
Payment Message:	WHITESTOWNWAYLRD

Status > Payment Processed