

RESPONSE TO AN BORD PLEANÁLA OPINION



PROPOSED RESIDENTIAL DEVELOPMENT AT RB CENTRAL, ROCKBROOK,
CARMANHALL ROAD, SANDYFORD BUSINESS DISTRICT, SANDYFORD, DUBLIN 18



PREPARED FOR:

IRES RESIDENTIAL PROPERTIES
LTD

PREPARED BY:

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Ref: ABP-303357-19

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1.0 Introduction

Tom Phillips + Associates, Town Planning Consultants have prepared this Response to the Opinion of An Bord Pleanála (dated 5th March 2019) regarding the proposed residential development of lands at RB Central, Rockbrook, Carmanhall Road, Sandyford Business District, Sandyford, Dublin 18 (see ABP Ref: 303357-19). This Response has been prepared under Article 285(5)(b) of the *Planning and Development (Strategic Housing Development) Regulations 2017* in association with the Applicant and Design Team and also provides the specific information as requested by the Board.

2.0 Specific Information Requested

The Board's Opinion contains 11 no. items that require the submission of specific information. Our response to the individual issue raised is set out below and cross referenced to the relevant technical reports and other material as required. All reports and assessments have been updated as relevant to reflect the matters raised in the Opinion.

2.1 Materials and Finishes

Item 1 of the Opinion requires:

'A report that specifically addresses the proposed materials and finishes and the requirement to provide high quality and sustainable finishes and details. Particular attention is required in the context of the visibility of the site and to the long-term management and maintenance of the proposed development'.

Applicant's Response:

The proposed development includes two contrasting façade treatments in both choice of material and articulation. Further information is provided in Sections 3.8 'Façade Design', 3.10.2 'Zones of Activity', 3.14 'Private Open Space' and 3.15 'Facilities' within the enclosed Architect's Design Statement. Please also refer Application Drawing Nos. 1742_P_402 to 1742_P_405 for further information.

External Façade

The external elevations fronting onto Carmanhall Road and the surrounding boulevards present a distinctive and unified façade of predominantly brick-facing material. This is in purposeful contrast to the surrounding developments comprising of extensive use of glazed curtain walls, pre-cast concrete and stone cladding. The massing of brick is broken by the insertion of a glazed curtain wall façade and winter garden elements to selected areas. These also serve to further define the proposed development's undulating form.

The external elevations are animated by an alternating repeat pattern of large format glazed windows, balconies and / or winter gardens. Depending on aspect, the balconies are fully recessed (south-facing onto Carmanhall Road), semi-recessed (west-facing onto the north / south boulevard), or fully expressed (north-facing onto north the / south boulevard). All serve to give a unified, but subtle, distinction to each facade.



Street level retail and community facilities are represented by predominant use of full height, structural glazing and set back from the main field façade overhead and between expressed concrete colonnades. The proposed crèche facility serves as a projected and colourful 'insertion' facing onto Carmanhall Road. Street level, own-door residential units are set back from the facade over, allowing the formation of defensible space facing onto Carmanhall Road and the east / west boulevard.

Internal Façade

The east and west courtyards form the private residential face of the proposed development and are designed to maximise daylight reflection within the heart of scheme. These two distinct spaces are defined by fully expressed private balconies and external access walkways (of glazed balustrading and white pressed metal panels) animating the facade. These are designed so as to blur the distinction between their respective uses by way of alternating and varying the depth / width of projections, coupled with transition from solid to glazed balustrading. The resulting arrangement gives the impression of a space that is actively populated.

The main field façade comprises of predominantly off-white coloured materials interspersed with select use of colour as highlight. Large format glazing to apartments is set between integrally coloured fibre cement rain screen cladding panels (to lower floor levels), blending into insulated, integrally coloured acrylic render on upper / top level floors.

All serve to provide a bright and contemporary aesthetic that is both eminently low maintenance and robust in weathering.

2.2 Life Cycle Report

Item 2 of the Opinion requires:

'A life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018)'.

Applicant's Response:

A Life Cycle Report in relation to the proposed development is enclosed with the application as prepared by McElroy Associates (MEA), Mechanical & Electrical Engineers.

2.3 Additional Drainage Details

Item 3 of the Opinion requires:

'Additional drainage details having regard to the report of the Drainage Division of the planning authority, as contained in Appendix B of the Chief Executive Report dated 15th January 2019'.



Applicant's Response:

PUNCH, Consulting Engineers has engaged with the DLRCC Drainage Division to close out all drainage-related queries raised at the pre-application stage and in the CEO's Report regarding this proposal. The Site Specific Flood Risk Assessment (SSFRA) and associated engineering drawings have been updated to address all outstanding items to the confirmed satisfaction of DLRCC, by way of email correspondence.

The key issues raised by DLRCC Drainage in relation to drainage are summarised below, together with the PUNCH responses:

- (i) DLRCC Comment: As the SHD process does not provide for Further Information, the Applicant should be advised to consult with and reach an agreement with the Drainage Planning Section of Municipal Services on surface water drainage proposals for this site in advance of the lodgement (subject to the consent of An Bord Pleanála following this stage of the process) of a planning application.

PUNCH Response: PUNCH have consulted extensively with the Drainage Division and have reached agreement with same on all surface water/drainage-related issues.

- (ii) DLRCC Comment: The application shall be required to provide drawings in A1 format and shall also increase the scale of the relevant drawings (in particular Drawing No. 152217-072, Rev. PLO) showing the existing and proposed services (including diversion) along the Carmanhall Road frontage, as this frontage is particularly congested with services. Dimensioned cross sections showing all services and utilities, including existing and proposed manhole chambers, should be provided for this congested frontage.

PUNCH Response: Please refer to amended / additional PUNCH Drawing Nos. 152217-072, 074, 075 for closer scale drawings and to PUNCH Drawing Nos. 152217-015, 011 and 012 for dimensioned cross sections. Drawings will be provided at A1 scale with the final planning submission.

- (iii) DLRCC Comment: In Section 2.2.10 of the PUNCH Engineering Planning Report, reference is made to "*Several minor retaining walls are proposed adjacent to and above the attenuation tank...the walls are designed to not structurally affect the attenuation tank below*", with a detail of the arrangement being shown in Section 4 of Drawing No. 152217-011, Rev PLO. A further reference is made to "*A component of the proposed building, and associated external roof is proposed adjacent to the attenuation tank. This structure is proposed only at ground level. The foundations for this are to be designed to not structurally affect the attenuation tank adjacent.*" The Applicant shall be required to provide further details and calculations supporting the Applicant's statements that these structures do not structurally affect the attenuation tank.

PUNCH Response: Please refer to amended PUNCH Drawing Nos. 152217-011 and 012 and amended comments in Section 2.2.10 in the Engineering Planning Report.



- (iv) DLRCC Comment: As standard, and for clarity, the Applicant is required to show cover and invert levels for the pipework on the manholes shown on Drawing Nos. 152217-011, Rev. PLO & 152217-012, Rev. PLO.

PUNCH Response: Please refer to PUNCH Drawing No. 152217-003.1 for cover levels and invert levels of the manholes requested. The relevant manhole numbers are as referenced on PUNCH Drawing No. 152217-003.

- (v) DLRCC Comment: As standard, the Applicant shall be required to provide supporting calculations for the attenuation storage volumes chosen.

PUNCH Response: The proposed network was modelled in detail in Microdrainage to ensure that the pipe network, attenuation tank and hydro brake performed adequately. Please refer to amended comments in Section 2.2.4 of the enclosed Engineering Planning Report for additional explanation in this regard.

- (vi) DLRCC Comment: As standard, the Applicant shall be required to provide additional supporting information on the design of the proposed Rainwater Harvesting system to ensure that the proposed 60m³ is appropriate for the end usage design volumes.

PUNCH Response: Please refer to additional comments in Section 2.3.4 of the Engineering Planning Report for justification of the proposed rainwater harvesting system.

- (vii) DLRCC Comment: As standard, the Applicant is required to provide Penstocks in the Hydro brake chamber and to ensure that the hydro brake provided does not have a bypass door.

PUNCH Response: Please refer to additional notes as provided on PUNCH Drawing No. 152217-003 and 011 for indication of the proposal in this regard.

- (viii) DLRCC Comment: Surcharging and flood risk of the surface water system has been shown in the Microdrainage analysis (Appendix D). The Applicant is required to provide commentary on the significance, if any, of these flagged surcharges and flood risks with reference to the freeboard used in the calculations.

PUNCH Response: In response to this comment, several pipes have been increased in size to eliminate any flood risk. Please refer to additional comments provided in Section 2.2.4 of the amended Engineering Planning Report for additional explanation in this regard.

- (ix) DLRCC Comment: The Applicant shall be required to produce a drawing with accompanying information in a tabular format clearly identifying the areas of roof/green roof being provided at each floor level, the various other SuDS measures being provided at each floor level.



(A variation of Drawing No. 152217-008, Rev. PLO and Murray & Associates landscape Drawing Nos. 1729_PL-P_02.2 would be a good starting point) and, in doing so, thus demonstrating that the minimum green roof coverage requirement of 60% is being achieved.

PUNCH Response: Please refer to amended PUNCH Drawing No. 152217-008 and amended landscape Drawing No. 1729_PL-P_02.3 for additional green roof breakdown. As required, the minimum 60% green roof coverage is provided.

- (x) DLRCC Comment: As standard, the Applicant will also be required to provide details of maintenance access to the green roofs, with particular emphasis on the higher buildings and the intensive green roofs which require more maintenance, and should note that in the absence of a stairwell type access to the roof, provision should be made for alternative maintenance and access arrangements such as external mobile access that will be centrally managed.

PUNCH Response: Please refer to Drawing No. P227 as provided by TOT Architects for the proposed arrangement of maintenance access to green roof area.

- (xi) DLRCC Comment: In Section 2.3.5 of the PUNCH Engineering Planning Report, the Applicant has provided figures of interception volumes available on the site in its entirety. However, the Applicant will be required to demonstrate how and where the interception/treatment volumes requirements are being achieved on the individual surface types across the site. (For example, on Drawing No. 152217-008, Rev. PLO, large areas of “impervious finishes” and “concrete paving” are shown but no information has been provided to show where the runoff from these areas are being either intercepted or treated.) Over provision of interception/treatment volumes in some sections of the site cannot be used as a balance for under provision elsewhere.

PUNCH Response: Please refer to additional explanation and breakdown as provided in the amended Engineering Planning Report. In particular, please refer to Table 7 of the Engineering Planning Report for a comparison of the required interception storage versus the provided interception storage for each area.

- (xii) DLRCC Comment: As standard, in the final submission, the Applicant shall ensure that there are no variances between the Engineering, Landscape and Architectural drawings or between the information on the drawings and the supporting reports.

PUNCH Response: The drawings and reports have been prepared in close co-ordination with the design team particularly the Architect and Landscape Architect, as demonstrated in the consistency of design information between the Engineering, Landscape and Architectural reports and drawings.



2.4 Additional Flood Risk Documentation

Item 4 of the Opinion requires:

'Additional documentation relating to appropriate flood risk assessment that demonstrates the proposed development will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk. A Flood Risk Assessment should be prepared in accordance with 'The Planning System and Flood Risk Management' (including associated 'Technical Appendices').

Applicant's Response:

PUNCH, Consulting Engineers has engaged with the DLRCC Drainage Division to close out all flood-related queries raised at the pre-application stage and in the CEO's Report regarding this proposal. The Site Specific Flood Risk Assessment (SSFRA) and associated engineering Drawing Nos. 152217-040 and 152217-052 have been updated to address all outstanding items to the confirmed satisfaction of DLRCC by way of email correspondence.

The key issues raised by DLRCC Drainage in relation to flooding issues are summarised below together with the PUNCH responses:

- (i) DLRCC Comment: A number of flood mitigation measures are outside the Roche Bobois retail unit and the adjoining Tivway site and are not within the Applicant's ownership. Necessary consents or agreements should, therefore, be provided to show that the works proposed and required in accordance with Appendix 13 can be delivered by the Applicant.

PUNCH Response: Please refer to Section 6.6 of the SSFRA for reference to Third Party consents required to provide the flood mitigation measures proposed along Carmanhall Road as illustrated in updated Drawing Nos. 152217-040 and 152217-052. These necessary consents have been secured by the Client and are consistent with the red line boundary indicated throughout the planning documentation.

- (ii) DLRCC Comment: Confirmation required regarding Drawing No. P005, as no drawing is listed in the TOT Architects Drawing issue sheet.

PUNCH Response: Please refer to Section 6.4 of the SSFRA and the updated TOTA Drawing No. P210 reference. This is now consistent with the architectural drawing.

- (iii) DLRCC Comment: Reference should be made to the significance and implications of the flood depth in the range of 0.25m to 0.5m shown on Figure 25 of the PUNCH SSFRA Report.

PUNCH Response: Please refer to Figure 25 and Appendix G of the SSFRA for illustrations of flood depths and Section 5.7 for commentary. Consistency between text and drawings can also be reviewed with reference to updated Drawing Nos. 152217-040.



- (iv) DLRCC Comment: The Applicant was requested to review the representation of the 0.1% AEP event flood level.

PUNCH Response: Please refer to updated Drawing Nos. 152217-040 for representation of the confined flood waters.

- (v) DLRCC Comment: The Applicant was requested to review and comment on the significance and implications of the flood depths in the range of 0.31m and 0.37m of the 0.1% AEP event flood levels.

PUNCH Response: Please refer to Figure 25 and Appendix G for illustrations of flood depths and Section 5.7 for commentary. Consistency between text and drawings can also be reviewed with reference to updated Drawing Nos. 152217-040 and 152217-052.

- (vi) DLRCC Comment: It was recommended that the conclusion should be revised to demonstrate how the proposed development is in compliance with Box 5.1 of the relevant Guidelines.

PUNCH Response: Please refer to Sections 7.0 and 8.0 of the SSFRA.

2.5 Residential Amenity

Item 5 of the Opinion requires:

'A report that addresses issues of residential amenity (both existing residents of adjoining development and future occupants) specifically with regards to overlooking, overshadowing, overbearing and noise. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and adjoining residential development. Furthermore, landscape and architectural drawings that clearly detail the relationship between wind mitigation measures and the design of the proposed development shall be included'.

Applicant's Response:

We refer to Sections 3.7 'Site Sections' and 3.9 'Landscape Strategy' of the Architect's Design Statement in addition to the enclosed Landscape, Daylight/Sunlight and Wind Assessments (see EIAR and stand-alone reports). We further refer to Drawing Nos. 1742_P_103, 1742_P_210 to 225, 1742_P_301 and 1742_P_402 to 404 inclusive.



In addressing the potential for overlooking, a minimum separation distance between the opposing faces of existing and proposed buildings along the boulevards is set at 22 metres, which are considered the main areas with potential for overlooking. This occurs at established points opposite the Sentinel office building (north/south boulevard) and the adjoining Tivway intersection (east/west boulevard). From here, separation distances increase to 27 metres and 32 metres respectively. The proposed new public plaza will further increase separation distances between the opposing faces of the northern / eastern corner of the proposed development and the existing residential Block D (Grand Central).

Within the proposed residential courtyards, a minimum separation distance between opposing north / south faces of 30 metres is achieved extending up to 58 metres (western courtyard) and 38 metres (eastern courtyard). Thus, in summary, it is submitted that adequate separation distances between the proposed development and existing development external to the site, and between blocks within the proposal, have been achieved such that overlooking between buildings will not occur.

Combined with the above and as clearly demonstrated in Sections 3.3.1 and 3.3.2 of the Architect's Design Statement, potential overbearing impacts have also been taken into account and addressed by careful consideration of building form and positioning of height around the site. The east/west boulevard (which holds particular existing residential significance) is widened from the original permitted HKR scheme, which is achieved by the introduction of a 'kink' on plan that allows for greater separation distance and the creation of more public open space at street level. Furthermore, the predominant height proposed along this route is 9 storeys, rising locally to 10 and 12 storeys. This is in contrast to the (originally permitted) predominant height of 10 storeys rising locally to 11 and 14 storeys respectively. Any perception of potential overbearing at street level is further lessened by the introduction of several oversized entrances or 'portals' through the perimeter of the development, the introduction of active frontage and transparent façade elements. This is in contrast to the permitted / existing, hard edged and somewhat more impermeable Grande Central development with raised private podium elements.

All of the above, together with the proposed detailed Landscaping Strategy as enclosed, have been tested against the relevant daylight/sunlight and wind assessment standards (see enclosed assessments). All recommended wind mitigation measures have been incorporated into the building and landscape design as detailed in the enclosed Landscaping Strategy and Architect's Design Statement and associated drawings. Various structural elements (iteratively tested in a wind tunnel by RWDI - see enclosed wind assessment) combine together to mitigate the effect of prevailing wind and to provide protected and comfortable communal open spaces at all times of the year. On the roof terraces, this includes multi-stemmed trees, carefully placed decorative porous wind screens and a solid glass balustrade surrounding the terraces. On the ground floor, raised planters, trees and vegetation have been located to mitigate the effects of the prevailing wind. Decorative porous metal screens are also used in various spaces for added pedestrian comfort. This ensures that the subject proposal will operate within all recommended standards in respect of wind comfort levels.

In terms of daylight and sunlight, the enclosed assessment prepared by ARC Architectural Consultants Ltd concludes that the proposed development will not materially affect the levels of daylight available to surrounding development as would have been available if the development envisaged under the parent permission (HKR scheme) had been constructed (see DLRC Reg. Ref. D05A/1159; ABP Ref: PL 06D. 215205 as amended).

This is a key parameter as referenced by the Board in its previous refusal of permission (see ABP Ref: PL 06D.248397; DLRCC Reg. Ref. D16A/0697) and detailed quantitative analysis of a representative sample of windows on Blocks A and D carried out as part of the current application confirms that the proposed development will not result in an *'..undue diminution in the availability of light to the existing apartments to the north, Blocks A and D, as compared to the previously approved development on this site'* (see Reason No. 3 of previous Board Decision). In summary, existing daylight levels to Blocks A and D will not be unduly affected by way of the current development when compared to what was previously permitted in this location.

Within the proposed development, the enclosed daylight assessment prepared by ARC concludes that all habitable rooms in all units within the proposed development are likely to achieve an Average Daylight Factor (ADF) in excess of the relevant recommended minimum levels. Finally, regarding sunlight access within the proposed open spaces, due to the constraints on sunlight access associated with the requirement to provide street frontage to Carmanhall Road to the south, the analysis shows that it is unlikely that the sunlight will hit the ground of more than half the area of the street level public and communal open spaces for at least 2 hours on the 21st March. However, the proposed 4 no. large communal terraces located on the upper floor levels will receive sunlight throughout the day and over considerably more than half their respective areas. The variety of communal open spaces within the proposal will, therefore, afford residents within the scheme access to a choice of communal open spaces and an opportunity to enjoy sunlight access at almost any time of the day throughout the year.

Regarding noise impacts, during the operational phase, potential sources of noise are limited to any new proposed building/mechanical services plant, car parking on site and any additional noise that may be generated as a result of the introduction of additional traffic onto existing roads. The enclosed noise impact assessment has concluded that the noise impacts from each of these sources is not significant in relation to its receiving environment (see Chapter 14 of the EIA). There are no uses or sources of noise emission proposed within the development that are considered to give rise to significant adverse impacts on the amenities of future residents of the proposal, or existing residents.

2.6 Daylight and Sunlight Analysis

Item 6 of the Opinion requires a:

'Daylight and Sunlight Analysis'.

Applicant's Response:

A detailed Daylight and Sunlight Analysis prepared by ARC Architectural Consultants Ltd is enclosed with this application (see Chapter 10 of the submitted EIA).



2.7 Retail Impact Assessment

Item 7 of the Opinion requires a:

'Retail Impact Assessment'.

Applicant's Response:

A detailed Retail Impact Assessment prepared by Armstrong Planning in association with Tom Phillips + Associates is enclosed with this planning application. This demonstrates that the proposed retail element of the proposal, which is modest in scale and designed to serve a local catchment only, will not give rise to any adverse retail impact on existing retail centres within the County.

2.8 Waste Management Plan

Item 8 of the Opinion requires a:

'Waste Management Plan'.

Applicant's Response:

A detailed Waste Management Plan prepared by Awn Consulting is enclosed as part of the EIAR submitted with this planning application (see Chapter 15).

2.9 Schedule of Accommodation

Item 9 of the Opinion requires a:

'Schedule of Accommodation'.

Applicant's Response:

A detailed schedule of accommodation prepared by the TOT Architects is enclosed with this planning application.

2.10 Landscape Plan

Item 10 of the Opinion requires:

'A detailed landscaping plan for the site which clearly sets out proposals for hard and soft landscaping including street furniture, where proposed. Details relating to the materiality of the proposed boulevard, together with proposals for the interface between proposed development and adjoining lands should also be submitted. Additional cross-sections, CGIs and visualisations should be included in this regard'.



Applicant's Response:

A detailed Landscaping Plan setting out proposals for hard and soft landscaping is enclosed with the application.

Interface with adjacent properties

Within the central courtyard, there is a level difference of approximately 4 metres between the subject site and the internal courtyard on the adjoining Tivway development. To soften this interface, a stepped series of raised planters is proposed, which will break down the scale of this height difference.

These will be planted with trees to aid screening between the courtyards and clad with composite timber to further soften the facades of the raised planters.

Hard Landscaping

A simple and robust palette of hard landscape materials is proposed. The paving materials are arranged to reflect the various changes in use and identity of the proposed public realm, while allowing a coherent and consistent treatment over the site. This creates a strong and integrated urban identity for the development. The main materials proposed are good quality exposed aggregate concrete paving in flag form (e.g., 600 x 300mm) and in block form (smaller unit sizes e.g., 200 x 150mm, 250 x 125mm). These are generally of light grey to silver colour range, with various darker colours used sparingly for contrast. Specific areas within the development are further defined by the use of various paving sizes, layout and colour. For example, internal courtyards have a smaller block unit to create a more human scale, domestic feeling within the communal spaces.

Soft Landscape

Due to the planting volumes being on an existing podium, careful consideration will be given to correct detailing and construction methodology. Consideration is also given to the variety of aspects, both sunny and shaded within the site.

Within these constraints, a wide variety of evergreen and deciduous shrubs and perennial planting is proposed within the internal courtyards. This will also incorporate pollinating and scented planting to create a 'gardenesque' setting within the communal spaces. In the public realm, raised planters with structural tree planting delineates both boulevards and the streetscape to Carmanhall Road. Larger tree species include Birch, Ornamental Pear, Lime and Rowan. These are of a semi-mature size with a 2 metre clear stem. Elsewhere, massing of multi-stemmed trees on both the ground level and on the roof terraces include species such as Snowy Mespilus, Tibetan Cherry and Silver Birch.



Street Furniture

Furniture proposed within the development consists of a restrained palette of high-quality elements. Proposals are robust, yet elegant, providing many areas for relaxation within the development. There is ample seating (age-friendly, with back and armrests) placed around the development, both in the streetscape to Carmanhall Road; within intimate spaces in the internal courtyards to raised planters incorporating recessed seating along the boulevard and community spaces. Other street furniture elements will be sited to ensure unhindered pedestrian flows and desire lines.

We refer the Board to the enclosed hard landscape plan (see Drawing No. 1729_PL_P_01.1) and soft landscape plan (Drawing No. 1750_PL_P_01.2) for details as described above.

2.11 Taken in Charge Areas

Item 11 of the Opinion requires:

‘A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority’.

Applicant’s Response:

It is not proposed that any areas will be taken in charge by the Planning Authority.

3.0 Conclusion

We trust that the Board find this Response to its Opinion regarding the RB Central development to be in order and that all issues raised are addressed in full and all information required is provided as requested.

Signed:

John Gannon
Director
Tom Phillips + Associates