

Response to Opinion ABP.Ref. 308186-20

Tack Sandyford SHD

**Strategic Housing Development for Build
to Rent apartment development for 207
units at Ravens Rock Road/ Carmanhall
Road, Sandyford, Dublin 18**

April 2022

Prepared on behalf of

Sandyford Environmental Construction Ltd.



www.mdb.ie

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1 Introduction

This report provides a response to Item 12(f) of the Application Form. The Opinion issued by An Bord Pleanála in December 2020 in relation to ABP.Ref. 308186-20 which stated that the documents submitted with the request to enter into consultations `required further consideration and amendment.

This report accompanies a Strategic Housing Development (SHD) application to An Bord Pleanála under the Planning and Development (Housing) and Residential Tenancies Act, 2016 on lands c.0.7 ha at the former ‘Tack’ site, Ravens Rock Road/ Carmanhall Road, Sandyford, Dublin 18.

On 22/12/20 The Board issued a Notice of Pre-Application Opinion highlighting the application required Further Consideration and Amendment concerning issues of 1) Development Strategy and 2) Residential Amenity. The Board in its Opinion also set out additional documentation which it was considered should be prepared in support of the application package.

This document sets out the applicant’s response to the various issues raised and identifies how the SHD application responds.

This response should be read in conjunction with the accompanying documentation prepared by McCauley Daye O’Connell (MDO) Architects, Waterman Moylan Engineers, IN2 Engineers, NMP Landscape as well as relevant Appropriate Assessment and Environmental Impact Assessment Report by Golder Associates.

A statement of consistency, planning report and material contravention statement has also been prepared and may be read in conjunction with this response as they also address issues raised.

Reference is made to the adjoining Avid site throughout this planning package, which is currently the subject of an SHD Pre-Application Consultation with An Bord Pleanála under reference ABP-312265-21. It is intended that in due course a co-ordinated and concurrent SHD planning application will be lodged by Atlas GP Ltd. for the adjoining Avid Site. This will be prepared by the same design team.

This application is made during a transition period between two development plans. The new Development Plan was adopted by the Elected Members of the Council at a special Council meeting held on the 10th of March 2022. The Plan will come into effect in 6 weeks from that date (i.e. 21st April 2022). Under the transitional provisions of the the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 this SHD application may be lodged no later than 19th April 2022. Therefore, while this SHD application is lodged under during the term of the expiring 2016 – 2022 County Development Plan, it will be assessed under the policies of the adopted Dún Laoghaire Rathdown County Development 2022-2028. It is noted that the Board’s Opinion was issued in the context of the 2016 – 2022 County Development Plan

The structure of this report follows the order in which the points have been raised by the Board.

A copy of the Board’s Opinion is included in Appendix A.

2 Response to Opinion

Each of the issues set out in the Board's Opinion is set out below in italics with the applicant's response provided in turn.

2.1 Development Strategy

2.1.1 *Scale, height, and design of the proposed development and the potential impact on the adjoining sites and surrounding environs of Sandyford*

Further consideration/justification of the documents as they relate to the Dun Laoghaire Rathdown Development Plan 2016-2022, specifically Appendix 15: Sandyford Urban Framework Plan, in relation to the scale, height, and design of the proposed development and the potential impact on the adjoining sites and surrounding environs of Sandyford. The further consideration/justification should address the proposed design and massing, inter alia the visual impact, and relate specifically to the justification for any material contravention of the density and height strategy in the development plan, issue of legibility, visual impact, and compliance with Section 3.2 of the Urban Development and Building Heights: Guidelines for Planning Authorities (2018). The further consideration of these issues may require an amendment of the documents and/or design proposal submitted.

2.1.2 *Response*

An Bord Pleanála is referred to the Design Statement and Masterplan document prepared by MDO architects which provides a detailed analysis of the urban design rationale for the revised development in the context of an integrated approach for the Avid and Tack sites as part of one co-ordinated masterplan.

MDO has highlighted in the Design Statement that the height of Block C (which faces Carmanhall Road), has been reduced from the previously proposed 14-storeys to 8/10-storey and with the overall height has been reduced by 16490 mm to minimise the visual impact of the building on the streetscape.

The form of the block has also been broken down through vertical setbacks and material alteration and variety. The use of carefully chosen lightweight materials on the upper two floors, visually break down the scale and massing of the block. A use of light grey metal above the 8-storey shoulder height clearly defines a roof scape and diminishes the visual impact of these levels when viewed from a distance.

The elevations of the lower floors are vertically divided by alternating the use of two-tone brick, with separations between materials created either through shadow gaps or deeper recesses in the facade, to create a dynamic street frontage. Where the darker brick occurs an external metal frame is introduced to bind all elements of the façade together and strengthen the street frontage.

A similar approach has been taken to Block C in breaking down the bulk and massing of Block B both horizontally and vertically. Block B has been designed to gradually scale the architecture down in volume and height towards west where the height of the neighbouring commercial / industrial buildings along Ravens Rock Road is 2-3 storeys. The overall height has been reduced by 3965 mm.

Similarly, it is proposed for Block B to have a 6-storey shoulder height with the top floor significantly set back. Lower shoulder height and set back were created to minimise the visual

impact of the building on the street and on distant views. The use of predominantly light-coloured materials has been chosen to be in keeping with the existing character of the area, with many of the neighbouring buildings being white and light grey.

The height of Block A facing Ravens Rock Road has been reduced from the previously proposed 7-storey to 6-storey as prescribed in the Development Plan and the overall height has been reduced by 2150 mm. Block permeability and pedestrian movement.

The Statement of Consistency Report notes that under Policy Objective PHP39 of the adopted County Development Plan (Building Design & Height) It is a Policy Objective to:

- Encourage high quality design of all new development.
- Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).

Appendix 5 of the County Development Plan sets out the County Building Height Strategy and includes BHS1 and BHS 2.

The policy framework allows *the consideration of increased heights and also to consider taller buildings where appropriate within the Sandyford Urban Framework Plan area*, (i.e. within 1000 metre/ 10 minute walk band of LUAS stop, DART stations or core /quality bus corridor, 500 metre / 5 minute walk band of bus priority route) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area (NPO 35, SPPR 1 &3).

Policy SUFP 3 of the Sandyford Urban Framework Plan 2022-28 is also qualified by Policy **BH1 BH5 SUFP which notes that additional height may be permitted where it can be demonstrated that additional height over the height limits identified on Map 3 accords with policy objective BHS1 and BHS2, of the Dun Laoghaire Rathdown County Development Plan 2022-2028, Appendix 5 subject to complying with the safeguards outlined in these policies as set out in Table 5.1 of the BH Strategy and any other development limits/phasing set out in the SUFP**

The Architectural Design Statement by MDO Architects sets out in detail the rationale and design development of the massing and design of the proposed development in respect of Policy Objective BHS1 and BHS2. This includes a demonstration of how the proposal complies with the 12 Criteria set out in “Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities (2009).

A Visual Impact Assessment is included in Chapter 13 of the EIAR and Verified Photomontages by Digital Dimensions are also provided. The application package is also accompanied by Building Life Cycle Report (MJP Consultants), a Strategic Flood Risk Assessment and a DMURS report (Waterman Moylan). A comprehensive Daylight and Sunlight assessment prepared by IN2 is also included in the SHD Package. The EIAR includes Micro Climate and Noise Assessments.

Elements of the proposed development are higher than provided for in the urban framework plan that applies to the site. However, An Bord Pleanála may still grant planning permission for the proposed development having regard to the policy framework set out under SUFP 3. Should the Board consider that a material contravention of the County Development Plan arises. A detailed justification of the material contravention of the height is provided in the accompanying Statement of Material Contravention.

2.2 Residential Amenity

2.2.1 Permeability

Further consideration and/or justification of the documents as they relate to future residential amenity, having particular regard to the following:

- *Permeability of the block for pedestrians and movement strategy within and around the blocks, including consideration of interface with and passive surveillance of paths along the eastern and southern boundary, and legibility of the pedestrian entrances to the development.*

2.2.2 Response

The Design Report by MDO provides detailed analysis of the urban design rationale for the layout of the proposed development considered in the broader context of a masterplan with the adjoining Avid site.

The approach and primary access to Block A and B is provided from Ravens Rock Road and to Block C from Carmanhall Road. A level entry to the communal courtyard has been provided from a gated, passage between Block A & B. A significant change in levels along Ravens Rock Road elevates the courtyard to the first floor around the Pocket Park in the north corner of the site and allows to enjoy the view of well landscaped public open space from residents' only terrace.

A secondary pedestrian access to the site from the Ravens Rock Road and Carmanhall junction, is providing level access to bike parking facilities and various shared amenity spaces overlooking the Pocket Park and creating an active street frontage.

A one-way traffic arrangement is proposed on the site with the entry of Ravens Rock Road and exit to Carmanhall Road to reduce the size and impact of the proposed junctions and to allow the permeability of the site and vehicular access for fire tender and services as well as to the residents only car park.

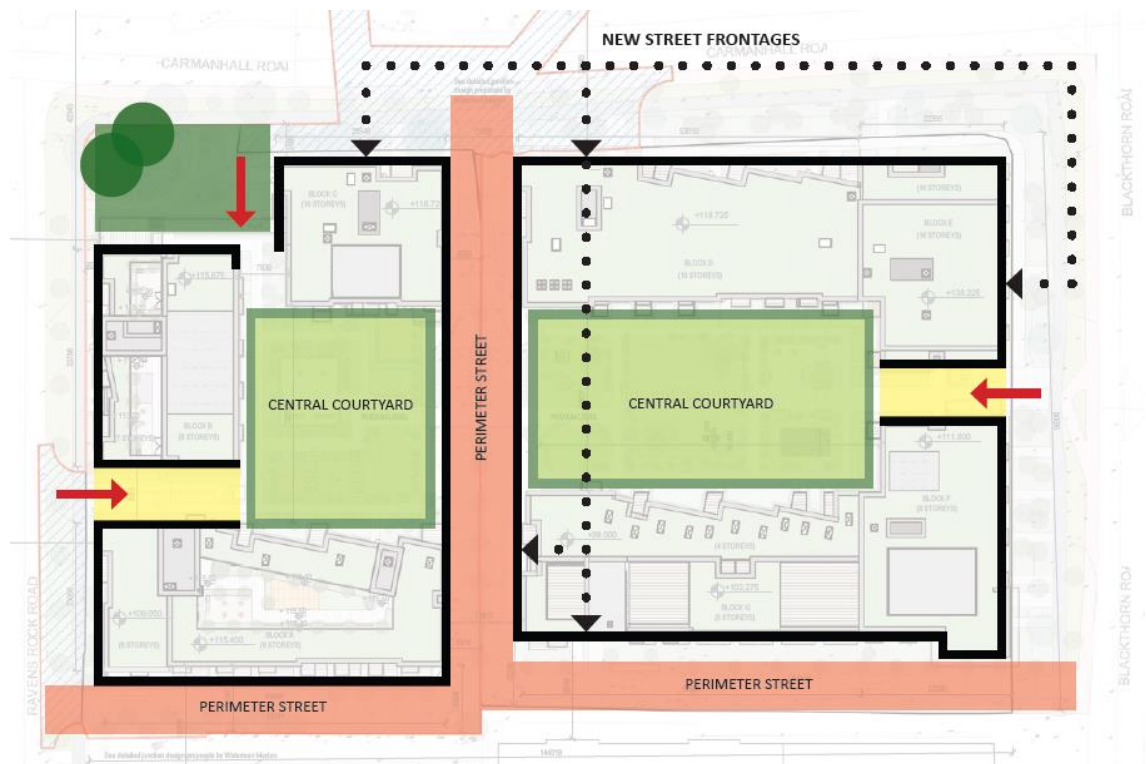


Figure 1: Tack-Avid Masterplan urban design analysis from MDO Design Statement

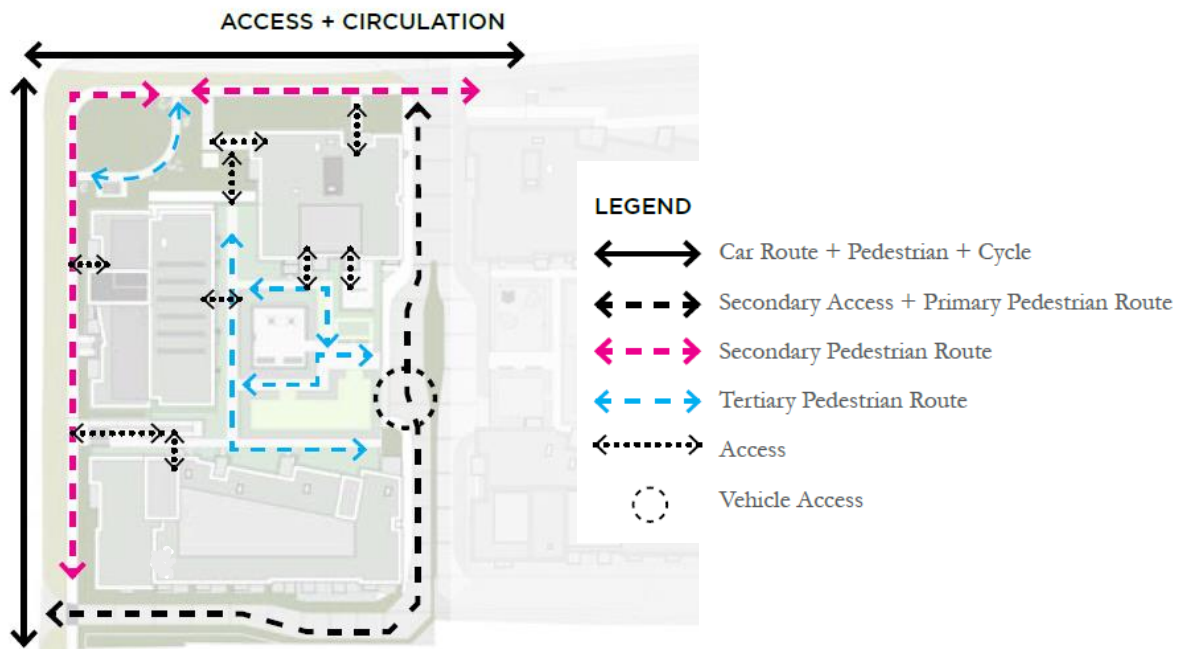


Figure 2: Access and Circulation analysis by NMP Landscape Architects', Landscape Design Statement

2.2.3 Communal open space

The quantum and quality of communal open space including the availability of sunlight and daylight to the courtyard, roof gardens, and the functionality of the spaces, including the ‘pocket park’.

2.2.4 Response

The Landscape Design Report prepared by NMP Landscape Architects provides detailed information on the proposed public realm improvements and quantum of communal open space. Analysis of sunlight and daylight is provided in the report by IN2 which is addressed under the next heading. In summary, the quantum of open space is summarised in the following graphic from the NMP Landscape report.



Figure 3: Breakdown of proposed communal and public open space by NMP Landscape Architects’, Landscape Design Statement

2.2.5 Sunlight and daylight assessment

Sunlight and daylight within the apartments.

2.2.6 Response

This SHD planning application package includes a comprehensive Daylight & Sunlight Report undertaken by IN2 Engineering Design Partnership.

The report summarises the analysis undertaken, and conclusions determined for the proposed arrangements.

Section 5.0 details the results of sunlighting and shading to external amenity spaces within proposed developments. 65% of proposed communal open space is predicted to receive at least 2 hours of direct sunlight on the 21st March. Therefore, amenity spaces were found to be compliant with the guidelines.

The impact of the proposed development on neighbouring buildings is assessed in Section 6.0. The proposed development is sited in the Sandyford Business District and therefore there are no dwellings within the impact zone of the scheme. Dwellings are defined under the BRE guide as having an expectation of sunlight and daylight, as there are none, the analysis was deemed not applicable.

The internal daylight analysis, as detailed in section 7.0, has been undertaken for all units across the development. The analysis determined that 95% of rooms were in excess of the prescribed BRE/BS guidelines as set out within this report, for average daylight factors (ADF). This extent of compliance was achieved through design development, with increased glazing/ reduced balcony depths / balcony locations etc. applied to ensure the residences can benefit from maximised daylight availability.

The 2020 apartment guidelines advise that *“Where an applicant cannot fully meet all of the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, which planning authorities should apply their discretion in accepting taking account of its assessment”*, therefore section 7.0 identifies these alternative, compensatory solutions.

IN2 note the BRE guide should be seen as advisory only as the guide was developed for low density urban housing, and was developed to inform design rather than to constrain it. Although the guide provides numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design.

IN2 highlight that while it should be noted that the current applicable guideline for calculation of daylight is the BRE'S BR 209, a comparative analysis has also been provided in Appendix A. This compares results under BR 209, BS EN.17037 and IS EN.17037, as defined in the standards and guidelines section of this report. This analysis determined generally good correlation between BR 209 and BS EN17037, which are both relevant for residential application. Unlike these documents, IS EN17037 does not provide specific guidance for residential application and is therefore more suited to commercial application.

Additionally, a further assessment has been compiled to include the results inclusive of the future development of the Avid site to the south of the scheme to ensure the proposed development does not impinge on its development potential.

In summary, this report confirms that Best Practice Sunlight and Daylight Availability have been ensured for the proposed Tack Sandyford Residential development.

2.2.7 Dual aspect units

The further consideration of dual aspect units having regard to the requirements of the Sustainable Urban Housing Design Standards for New Apartments (2018), SPPR 4. Further justification required in terms of residential amenity, consideration of outlook, and access to daylight/sunlight.

2.2.8 Response

The Design Statement prepared by MDO Architects confirms that 45% of the proposed residential units have dual aspect, which exceeds the requirements as stated in section 3.19 of Design Standards for New Apartments.

It is proposed to provide 414 sqm. of high quality Shared Residential Amenities on the lower ground floor of Block B and C, 2 sqm. / residential unit. These will activate the street frontage onto Ravens Rock Road and Carmanhall Road and provide generous spaces for the residents of all three blocks to meet, relax and exercise together, reinforcing a sense of community. The proposed shared residential amenities include a resident's lounge, co-working spaces, meeting room, children's playroom, a kitchenette, and entertaining space.

2.2.9 Community and Social Infrastructure

Access to community and social infrastructure, open space and amenities, in the wider area.

2.2.10 Response

This SHD Planning Application is accompanied by a Community Infrastructure Audit report prepared by MacCabe Durney Barnes which provides analysis of the access to services and amenities within the catchment of the subject site. The audit has identified a number of community facilities and amenities in the surrounding area. It also notes the residential amenities provided as part of the development and concludes that the development would not add undue pressure on existing facilities.

2.3 Additional documentation prepared in support of the application package

This section provides a response to the additional documentation which The Board in its Opinion considered should be prepared in support of the application package.

2.3.1 Permeability

1. Consider further the permeability of the blocks, pedestrian movement strategy between blocks, interface and access to podium level open space, clarity in relation to level changes, interface with proposed new streets, and potential conflict between pedestrians and vehicles using the basement access ramp/'street'.

2.3.2 Response

As noted above, the Landscape Design Report prepared by NMP Landscape Architects provides detailed information on the proposed public realm improvements and quantum of communal open space. The NMP Landscape Architecture drawings provides a series of detailed cross sections for the proposed boundaries.

The proposed development has been amended from the Pre-Application Consultation stage so that the vehicular access from Ravens Rock Road and the ramp to the car park have been offset further south from Block A and to allow for creation of a generous landscaped terrace where the private amenity space for ground floor units is allocated.

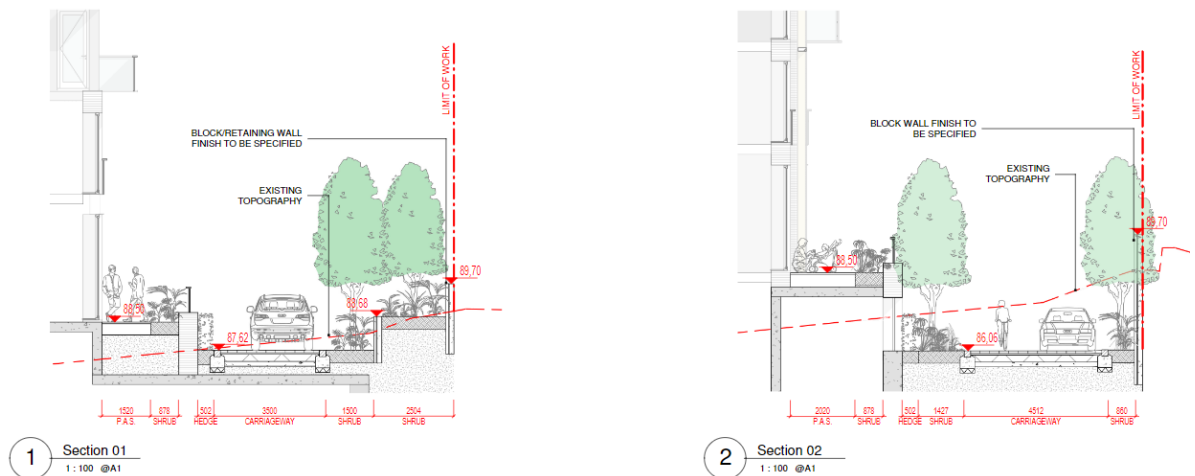


Figure 4: Extract from cross-section of access road drawings by NMP Landscape Architects



Figure 5: Extract from Landscape Masterplan road drawing by NMP Landscape Architects illustrating landscaped verge onto Ravens Rock Road

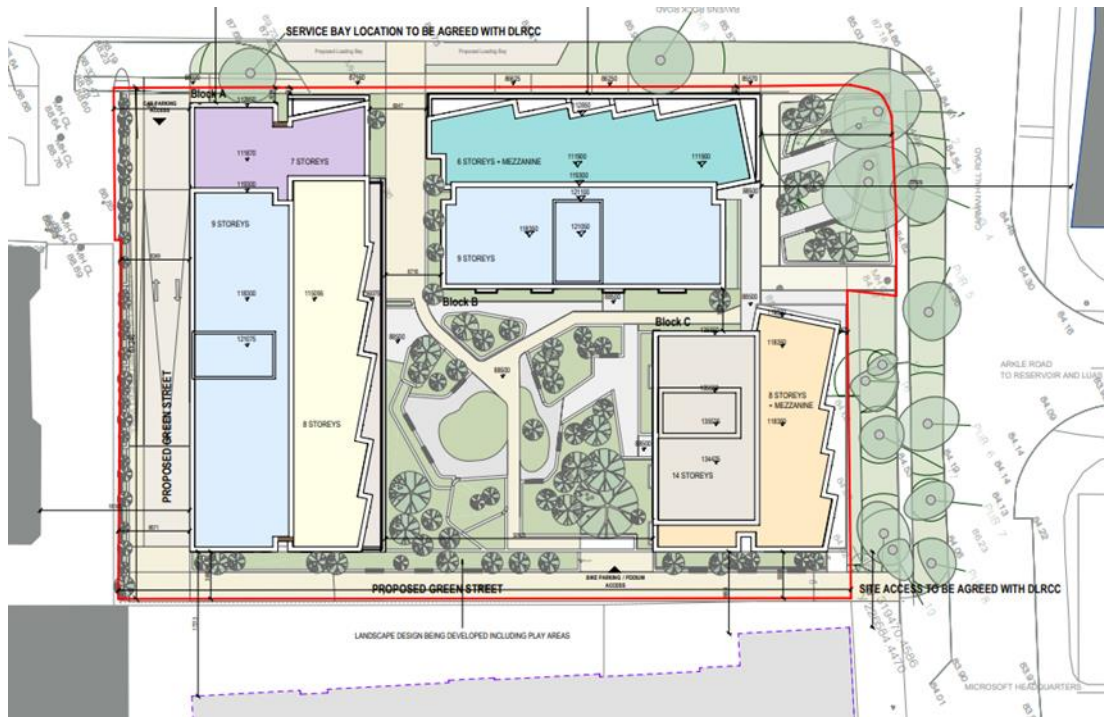


Figure 6: Extract from site plan reviewed at PAC stage

2.3.3 Location and quantum of resident support facilities

2. Detail and justification of location and quantum of resident support facilities and resident services and amenities as defined by the Sustainable Urban Housing Design Standards for New Apartments Guidelines (2018) and accessibility/ease of access to those spaces by future residents.

2.3.4 Response

This planning application package includes a Property Management Strategy report prepared by Aramark Property.

It highlights that the development has been designed with quality of amenity space as a central consideration for both residents and the wider community. It is proposed to provide 415 sqm of high quality shared residential amenities in Blocks A, B and C, 2 sqm/residential unit. The proposed shared residential amenities include a resident’s lounge, co-working spaces, meeting room, children indoor play area, and a library.

Additional uses and facilities provided in the scheme include a communal garden courtyard, children’s playground, and several shared residential amenities, all of which can be easily accessed by residents. The central garden courtyard will be located at ground floor level podium covering the car park and can be used as an outdoor amenity space which is safe and passively overlooked.

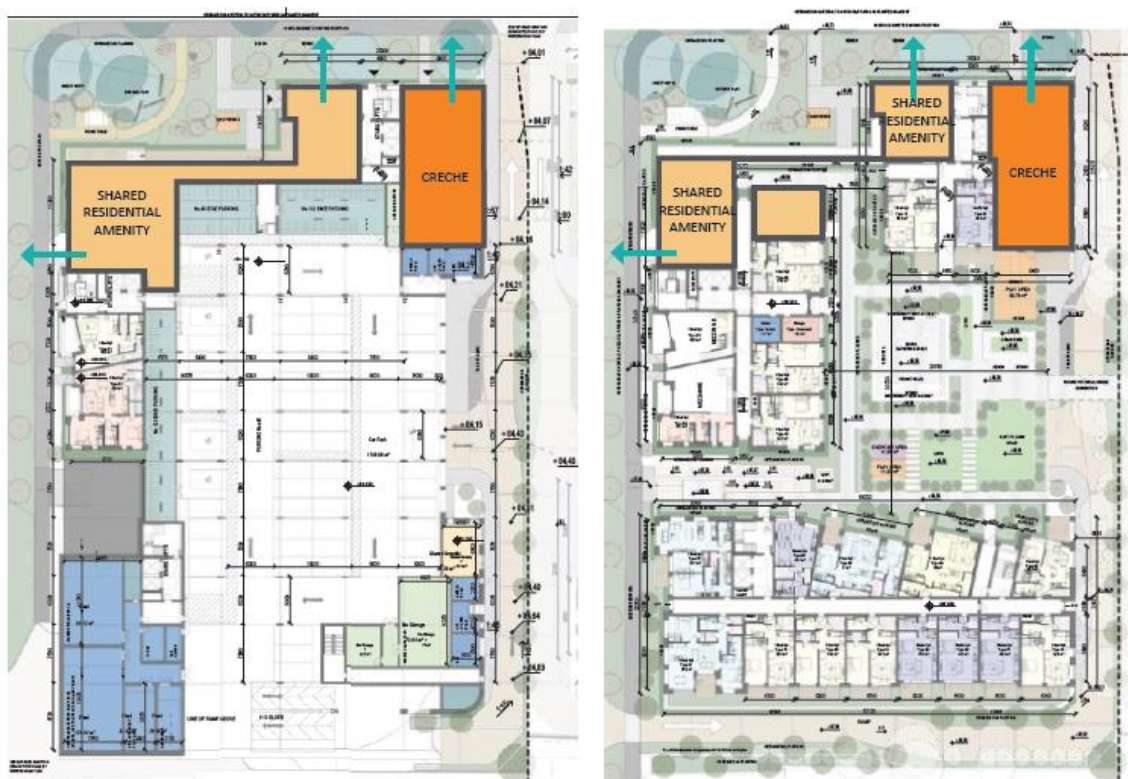


Figure 7: Illustration of location of Shared Amenity Spaces and Creche at Lower Ground and Ground levels from MDO Design Statement

2.3.5 Public Realm

3. Further detail and consideration of works required to the public realm, including the 'linear greenway' required under the SUIP along Carmanhall Road and footpath network along Ravens Rock Road, including a letter of consent from the planning authority in relation to any areas in their ownership.

2.3.6 Response

The Landscape Design Report and Landscape Drawings prepared by NMP Landscape Architects provides detailed plans, sections and design information on proposals for the interface between the public roadway, verges and building frontage. This was discussed on-site with the Senior Parks Superintendent and NMP Landscape Architects.

DLR has invested in a high quality planning scheme in the verge and it is the overall landscape strategy to preserve DLR's planting strip and complement the Council's approach and replenish verge planting as appropriate (at old site access locations for example).

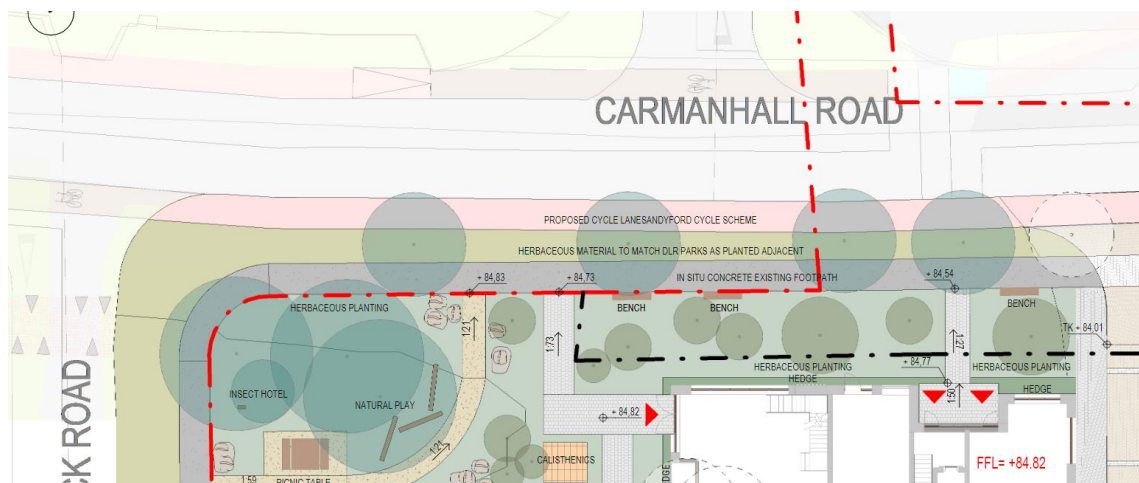


Figure 8: Extract from Landscape layout drawing by NMP Landscape Architects

2.3.7 Ravens Rock Road Ground level interface

4. Further consideration of the interface of ground level apartments with Ravens Rock Road and with the ramp to the basement car park.

2.3.8 Response

The design of the interface of ground level apartments with Ravens Rock Road and with the ramp to the basement car park are addressed in detail in the drawings, sections and Landscape Design Report produced by NMP Landscape Architects.

Section 4.4. of the NMP report notes that the internal street will be a shared surface - high friction finish, with paved areas and will be narrow in width and will provide access only for residents of blocks, service and emergency vehicles as well as pedestrians and cyclists. The external street will be an active vibrant space and a positive for the masterplan.

A series of detailed sections is provided in the drawing pack by NMP which illustrates the defined public and private realm zones.

2.3.9 Boundary Treatment

5. Details of boundary treatment across the site.

2.3.10 Response

Please refer to the Landscape Design Report produced by NMP for detailed information on the proposed public realm improvements submitted as part of this SHD application.

Section 4.4. of the NMP report notes that the planted areas will replicate the existing wildflower and perennial plant mix in transitioning from the private development into a more unified streetscape which integrates various level changes.



Figure 9. Section through verge area from NMP Landscape Design Statement

2.3.11 Open Space quantum and design

6. Detailed quantum and design of open space proposals at all levels including consideration of issues related to wind micro-climate, design, and usability of spaces, in particular at the upper levels, and any implications of the blue roof design.

2.3.12 Response

The quantum and design of the hierarchy of open spaces is detailed in the Landscape Design Report produced by NMP Landscape Architects. Chapter 12 of the EIAR includes a comprehensive analysis of Microclimate prepared by B-Fluid Limited.

2.3.13 Childcare facility open space

7. Identify provision of segregated play space for the proposed childcare facility, interface of such a facility with communal open space, and consideration of access to sunlight/daylight in the childcare facility.

2.3.14 Response

The Landscape Design Report prepared by NMP landscape architects identifies the location of the segregated play space provided beside the childcare facility in Block C. It is positioned in the communal open space in the courtyard and avails of good levels of sunlight/daylight as

detailed in the IN2 Daylight and Sunlight report. The NMP drawings provide detail on outdoor furniture, planting proposals and play facilities for the courtyard.

2.3.15 Mezzanine level rationale

8. *Rationale in relation to the mezzanine levels proposed in the design of the apartments and childcare facility.*

2.3.16 Response

The MDO Design Report presents a detailed analysis of the architectural design response to the site. It notes that due to a significant drop in levels across the site and to avoid stepping in the elevation, the changes in topography are mitigated internally and the units provided with an additional mezzanine floor.

The higher ground floor units provide elegant street frontage and mainly accommodate shared amenity spaces for the residents. Both, high ceiling, and large glazing add quality to these areas.

The introduction of the mezzanine floor in the creche allows to keep the design principle of street frontage across the development where large openings create bright indoor space for young children and provide street entry along with a connectivity with the elevated podium and play area.

There are two residential units in Block B with a mezzanine floor. These are own door units extending an active street frontage, creating pedestrian movement and surveillance, further south. A lofty character of the units and own door make them unique, feature like apartments.

2.3.17 Arboricultural Assessment

9. *Detailed Arboricultural Assessment.*

2.3.18 Response

This SHD Planning application includes an Arboricultural Assessment, Arboricultural Impact and Tree Protection Strategy Report prepared by CMK Horticulture & Arboriculture Ltd.

Section 2.1 **Arboricultural Impact notes that** *'The direct impact of the proposed development will necessitate the removal of tree groups #G8-G15 including individually assessed trees #5-7 and #11. These groups provide screening to Mercury House to the south and the adjacent Ravens Rock road. The loss of these trees is not considered particularly significant as they have reduced life expectancy due to their poor form. The mature alder (#G13) being the most pronounced example.*

The installation of underground services required to service the site, located outside the site's perimeter will necessitate the removal of a public street tree (PUB10). Additional public street trees (PUB 1, 8 & 9) will require removal to accommodate proposed vehicle entrances on Ravens Rock and Carmanhall Roads.

The retention of the mature oak and beech (#1-4) through design accommodations in the proposed plan is welcomed, as these trees represent the highest value specimens within the site and indeed within the surrounding business Park. Within this space is proposed a pocket park containing a compacted gravel pathway that will be constructed using a no-dig method so as to mitigate impact on roots.'

The impact on trees is shown on drawing TTAK001 102.

Mitigation

NMP Landscape Architects have prepared a comprehensive landscape plan as part of the planning package. It outlines planting to mitigate for the removal of existing trees.

Mitigating the loss of existing trees will take time, however the younger age profile of trees being removed and the size specifications of the proposed replacement tree stock should reduce this time period significantly. As landscape proposals mature over time, the site will regain any perceived losses.

To reduce the impact of construction activity, it is recommended to use tree root protection matting south of trees #1-4. This matting should remain in place for the initial construction phase and removed only for the landscaping phase (refer to drawing TTAC001 103 for locations).

The construction of the proposed apartments south (block 'B') is likely to have an impact on roots for the mature oak tree #4. To avoid any severe impact on these roots it is recommended that building excavation be constrained if possible to 1m north of the proposed northern wall for block b.

A methodology for managing trees during construction is contained within section 3 of the CMK report with the locations of tree protection fencing and protective matting shown on drawing TTAC001 103.

2.3.19 Social and Community Audit

10. A Social and Community Audit

2.3.20 Response

A Social and Community Audit Report has been prepared by MacCabe Durney Barnes as part of this SHD application package. It is also discussed in s.2.2.10 above.

2.3.21 Car and cycle parking

11. Provide further justification for the level of car and cycle parking proposed and detail the design of cycle parking spaces and secure storage areas. The justification should include an analysis of car and cycle parking demand that is likely to be generated by the proposed development taking account of the locational context and level of connectivity (by all modes) to services and employment generators.

2.3.22 Response

This SHD Planning application includes a comprehensive Traffic & Transport Assessment (T&TA) prepared by Waterman Moylan Consulting Engineers Ltd. Section 10 of the Report provides a detailed analysis of car parking policy and provision. A Travel Plan has also been submitted as part of the SHD package..

The proposed provision of car parking on the subject site will be 79 spaces calculated at the rate of 0.35 space per unit per unit for 207 units.

The provision of 79 spaces will include 4 spaces for disabled drivers (4%), 8 spaces with charging facilities for electric vehicles (10%) and 2 spaces for car sharing (GoCar).

A total of 56 spaces will be located at Lower Ground Level as shown in Figure 8 with a total of 23 spaces at Basement Level as shown in Figure 9 of the report.

The proposed development includes 288 cycle spaces comprising 48 spaces Short Stay (Visitor) and 240 Long Stay (Residents) spaces.

Section 10 highlights that in a number of recent decisions, An Bord Pleanála has approved a much-reduced provision of car parking when compared with the maximum standards set out in the various Development Plans. The contents of Table 12 are in broad agreement with the experience of existing BTR schemes where the demand for car parking is approximately 0.3 spaces per unit.

2.3.23 Sunlight and Daylight Analysis

12. Provide updated Sunlight and Daylight Analysis (based on a representative sample of units that includes assessment of worst-case scenarios); updated Wind and Microclimate Analysis (including details of any proposed mitigation measures); and an Inward Noise Assessment.

2.3.24 Response

As noted above, this SHD planning application package includes a comprehensive Daylight & Sunlight Report undertaken by IN2 Engineering Design Partnership. Chapter 12 of the EIAR includes a comprehensive analysis of Microclimate prepared by B-Fluid Limited. Chapter 9 of the EIAR by WSP Golder addresses Noise and Vibration.

2.3.25 Material Strategy

13. A Materials Strategy that details all materials proposed for buildings, open spaces, paved areas and boundaries. This strategy shall include details of the colour, tone and texture of materials and the modelling and profiling of the materials on each block. The documents should also have regard to the durability of materials and the long-term management and maintenance of the proposed development.

2.3.26 Response

The Design Statement by MDO Architects includes a section on the proposed Materials Strategy.

The durability of the proposed development has been considered in the careful selection of high-quality materials such as brick and metal panel which would weather well and would not require much maintenance. The variation in material use breaks down the massing of the buildings whilst providing visual interest and adds diversity in the building fabric, avoiding a monolithic and monotonous outlook.

Brick, a material that requires little maintenance will be the predominant material used in the development. It is proposed to use a mix of off white and grey brick on the lower floors, up to the shoulder height defined in the Development Plan. Alternating the colours of brick allows to break down the volume of the buildings and create a visually interesting frontage. The upper two floors of each block and setbacks are proposed to be finished in a lightweight material to further reduce the scale and visual impact of the development by blending into the existing skyline.

A feature is made of the recesses that allow to avoid north facing apartments by an introduction of the external metal frame, flush with the brick finish, tying the elevation together as a whole.

2.3.27 Housing Quality Audit

14. A Housing Quality Assessment that provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculations and tables required to demonstrate compliance of the various requirements of the 2018 Guidelines on Design Standards for New Apartments.

2.3.28 Response

This SHD application package includes a detailed Residential Quality Audit prepared by McCauley Daye O’Connell Architects which addresses the various requirements of the 2018 Guidelines on Design Standards for New Apartments.

2.3.29 Building Life Cycle Report

15. A Building Life Cycle Report that includes an assessment of the long term running and maintenance costs associated with the development in accordance with Section 6.13 of the 2018 Guidelines on Design Standards for New Apartments.

2.3.30 Response

This SHD planning application package includes a Building Lifecycle Report prepared by Aramark. The purpose of the report is to provide an initial assessment of long-term running and maintenance costs as they would apply on a per residential unit basis at the time of application, as well as demonstrating what measures have been specifically considered to effectively manage and reduce costs for the benefit of the residents.

The Building Lifecycle Report has been developed on foot of the revised guidelines for Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities issued under Section 28 of the Planning and Development Act 2000 (as amended) December 2020. Within these guidelines, current guidance is being provided on residential schemes.

Section 6.13 of the Apartments and the Development Management Process guidelines for Sustainable Urban Housing: Design Standards for New Apartments (December 2020) requires that:

“planning applications for apartment development shall include a building lifecycle report which in turn includes an assessment of long-term running and maintenance costs as they would apply on a per residential unit basis at the time of application, as well as demonstrating what measures have been specifically considered by the proposer to effectively manage and reduce costs for the benefit of residents.”

2.3.31 Taken in Charge

16. A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority.

2.3.32 Response

It is not proposed that additional lands are taken in charge by the Local Authority as part of this planning application. The Site Plan highlights those areas within the Red Line in blue hatching in the ownership of Dún Laoghaire Rathdown County Council.

These areas are required to facilitate road access to the development and connection to utilities. The landscape plan provides for a comprehensive planting scheme for the verge areas as discussed and agreed with the Council. Those lands currently in the Council’s ownership shall

be completed and landscaped as part of this planning application and made good in agreement with the Council. Lands within the applicant's ownership shall remain under the site's private management.

2.3.33 EIA R

17. Information for the purposes of screening for EIA as set out in schedule 7A of the Planning and Development Regulations 2001 (as amended) where the application is not accompanied by a full EIA R. The information should be submitted as a standalone document and refer to the potential for cumulative effects in conjunction with other permitted and planned housing and road developments in the area.

2.3.34 Response

This planning application is accompanied by a full sub-threshold EIA R prepared by WSP Golder.

2.3.35 Construction Environmental Management Plan (CEMP)

18. A detailed Construction Environmental Management Plan.

2.3.36 Response

This SHD planning application package is accompanied by an outline Construction Environmental Management Plan (CEMP) prepared by WSP Golder.

2.3.37 Building Life Cycle Report

19. A building life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban housing: Design Standards for New Apartments (2018). The report should have regard to the long term management and maintenance of the proposed development.

2.3.38 Response

As noted above, this planning application package includes a Property Management Strategy report prepared by Aramark Property, which provides detail on long term management and maintenance. It highlights the following commitments.

Management Offices

The development will have a designated management office and concierge suite, this office will focus on management of the residential management and the overarching management of the scheme, with an emphasis on security, surveillance of vehicular & pedestrian access, waste marshalling area, parcel deliveries, car parking, events management and community and stakeholder engagement.

The management and residents support services area will serve as a meeting place for residents, additional security, and a central hub where key estate and resident management services will be offered. For the management team, it will provide a single space or base from which these elements can be pooled and managed efficiently.

Onsite Property Manager

The Onsite Property Manager would also be responsible for overseeing and coordinating resident move in/out strategy in terms of deliveries.

The service would operate from the support and internal facilities areas provided. The onsite property manager would be responsible for achieving a sense of community within the scheme.

Residential Concierge Team

The development will have a Residential Concierge Team. The service hours are envisaged to be from 08.00 to 20.00 Monday to Friday, Saturday - Sunday 09.00 to 14.00. There may be a requirement change these times depending on residents' requirements.

2.3.39 Issues raised by Transportation, Drainage Planning, and Parks Divisions of Dun Laoghaire Rathdown County Council

20. Response to issues raised by the Transportation, Drainage Planning, and Parks Divisions of Dun Laoghaire Rathdown County Council, as per the reports submitted in Appendix C of the Planning Authority Report, received 15th September 2020.

2.3.40 Response

This SHD Planning application includes a series of Engineering Reports prepared by Waterman Moylan Consulting Engineers Ltd. and IN2 Engineering Design Partnership.

Appendix C of DLR Report refers to 10 items which are addressed in this submission:

- 1. Proposals to include calculations on storage volume requirement and restricted allowable outflows for each roof element. A range of rainfall events should be modelled to identify the worst case storm event. The applicant will be required to show the outlets from each of the roof elements.*

Section 4 of the Waterman Moylan Engineering Assessment Report addresses Surface Water Drainage.

- 2. The applicant is required to provide additional information on the provision of green/blue roofs at each floor level, clearly indicating the type of green/blue roof being provided at each roof level, details of the build-up of each type of proposed green/blue roof across the different roof usages being proposed (communal/private) that demonstrates the suitability of the roof type for the proposed usage by residents. The applicant also needs to consider the long term viability of the private roof terrace areas in terms of maintenance and also in terms of the effects of orientation and possible overshadowing from taller buildings.*

The proposed development provides for Green Roofs/Green Podium as part of a series of SUDS Measures. See Section 4 and Table 4 of the Waterman Moylan Engineering Assessment Report

- 3. The applicant is required to comment on the provision or non-provision of PV panels in relation to the extent of green/blue roof provision requirements.*

The provision of PV panels is addressed at Section 3 of the IN2 Engineering Energy Analysis Report in discussion of Primary Energy and Renewable Technologies.

Engineering Details

4. *The applicant proposes the use of a rainwater harvesting system (via a petrol interceptor) to provide for interception treatment storage for the access ramp. The applicant is required to provide sizing calculations for both the rainwater harvesting system and petrol interceptor and also provide details of how overflows from the system are to be managed.*

Items 4 to 9 of the local authority's report refer to detailed drainage drawings and reports. These items are addressed in the detailed Engineering Drawings prepared by Moylan Consulting Engineers Ltd. and addressed in the the Waterman Moylan Engineering Assessment Report.

5. *The applicant is required to provide full details of the proposed attenuation storage system at podium level.*
6. *The applicant is required to submit long section of the proposed surface water drainage layout and to include Cover and invert levels on the main drainage layout drawing NJOG Drawing No. DL-302 Rev. B.*
7. *The applicant is required to undertake a utilities clash check at the proposed connection point of the surface water outfall to the 450mm diameter public surface water sewer.*
8. *As standard, the applicant is required to provide details of maintenance access to the blue/green roofs 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.*
9. *As standard, the applicant is required to provide a penstock in the flow control device chamber and ensure that the flow control device provided does not have a bypass door. The applicant shall also clarify whether a silt trap is being provided in the flow control device chamber and if not to make provision for same.*

Flood Risk Assessment

10. *In the absence of attenuation storage provision at ground level a surcharge analysis is very important. As standard, the applicant is required to submit an assessment of flood risk arising from blockages (and consequential surcharging) of the surface water drainage system. For the purpose of the analysis a figure of 50% blockage is to be assumed. No overflows arising from a possible surcharge will be allowed onto the public road so provision should be made for containment within the site, should overflows be predicted.*

Please refer to the Flood Risk Assessment prepared by Waterman Moylan Consulting Engineers Ltd

2.3.41 Material Contravention Statement

21. *Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.*

2.3.42 Response

This SHD Planning Application is accompanied by Material Contravention Statement prepared by MacCabe Durney Barnes. The public notices make reference to this as required.

3 Dun Laoghaire Rathdown County Council

This section specifically addresses the points raised by the local authority in their submission to An Bord Pleanála.

3.1 Response to submission of Local Authority

This section provides an overview of DunLaoghaire Rathdown County Council's stated areas of "Main Concerns" in their pre-application report to An Bord Pleanála. The issues raised planning authority are quoted in *italic* and the amended development proposal's response in this SHD package are documented below.

3.1.1 *Quantum of development*

The quantum of development proposed is excessive having regard to the level of existing and planned public open space within the Sandyford Business District, resulting in a poor standard of residential amenity for future residents.

3.1.2 *Response*

The subject 'Tack' site together with the adjoining 'Avid' site shall be developed in a perimeter block typology in accordance with the urban design objectives of the SUFP. There is planning precedent for a 10-14 storey scheme with 182 units (319 units/ha) on the subject site (PA Reg Ref D05A/0566) and the Sandyford Student SHD under ABP Ref 303467 giving **131 student units** (817 student bedspaces) up to 9 storeys on the Avid site. Delivery of high density on these sites has been accepted as entirely appropriate.

There have been several decisions in support of high density living in locality, including the former Aldi site, Carmanhall Road/Blackthorn Drive (North) (ABP-305940-19) where permission was granted for 564 no. build to rent apartments, creche and associated site works on 12/03/2020. It is also relevant to refer to the Rockbrook Phase II: SHD scheme (ABP PL06D.304405428) for 428 apartments in two blocks ranging in height from five to fourteen storeys and the Siemens site (ABP-311722-21) for a development comprising of 190 Build to Rent apartments consisting of two blocks of 14-15 storeys height (including basement), which was Granted Permission in March this year.

DLRD's insistence on a pro-rata association between residential density and amenity provision is in fact a false equation. In reality, the delivery of high density actually enables the delivery amenity open space in area.

There is no objective to provide a public park or open space on the subject site. We also note that under the adopted County Development Plan 2022-28, SUFP (Appendix 17).

- It is an objective of the Council to actively pursue the use of the evolving reservoir site as active public open space (also Local Objective 85)
- It is an objective of the Council to develop a Sandyford Business District Civic Park (circa 0.8ha of public open space) through a combination of development contributions and other funding streams.
- It is an objective of the Council to provide public open space for active and recreational uses as identified on Drawing No. 10.
- The Local Authority will actively pursue the provision of this public open space. This public open space will be funded in accordance with the Development Contribution Scheme adopted for the Plan area.

3.1.3 Site Layout and Tree retention

The proposed site layout, whilst generally acceptable, would result in the loss of a high number of trees of value, including street trees. Revised proposals which provide for the retention of the tree stand in the southwest corner of the site should be explored.

3.1.4 Response

The proposed development provides a perimeter block typology in accordance with the Sandyford Urban Framework Plan. As such, there is an unavoidable conflict between the strategic planning goals and objectives to preserve trees within the site. The development proposal seeks a compromise to preserve the most valuable trees on the site at the corner of Carmanhall Road and Ravens Rock Road in the public park. While there will be a loss of trees and shrubs at the boundary with the Mercury property, this is more than compensated for with the comprehensive landscape plan and planting proposals.

3.1.5 Building Heights

The proposed buildings heights do not relate to their immediate context as set by those buildings on the north side of Carmanhall Road and the permitted student housing development on the adjoining 'Avid' site. The eight-storey building height limit, as set out on Map No.3 SUFP, should be upheld in this regard. Greater justification is required for the proposed tower / landmark building on the site having regard to the overall legibility of the Sandyford Business District and the proposed building heights on Ravens Rock Road having regard to the character and microclimate of this street.

3.1.6 Response

This item is addressed at Section 2.1 above in response to the Board's Opinion.

3.1.7 Impact on the development potential of adjoining sites

The applicant should also be encouraged to consider how the proposed development might impact on the development potential of adjoining sites, and to present justification in this regard in any forthcoming application.

3.1.8 Response

In response to this issue, Sandyford Environmental Construction Ltd. and Atlas GP has prepared a co-ordinated and integrated masterplan for the Tack and Avid sites. The Design Statement and Masterplan prepared by MDO Architects and all documentation submitted as part of this SHD application present a cumulative assessment of the two sites. We also refer to the letter of consent from the adjacent owners.

3.1.9 North facing apartments

The high number of north facing apartments having a low Average Daylight Factor in unacceptable. Greater analysis and revised proposals are required in this regard.

3.1.10 Response

Please refer to the sunlight and daylight report by IN2.

3.1.11 Sunlight and daylight

The level of direct sunlight reaching the proposed courtyard podium space, which is the principal area of communal open space within the development, does not meet the BRE guidelines in respect of site layout planning for daylight and sunlight. The height of proposed Blocks A and B, which exceeds the SUFP building height limits, is likely to be a contributing factor.

3.1.12 Response

Please refer to the sunlight and daylight report by IN2.

3.1.13 Public Realm

Proposals to upgrade the public realm along Carmanhall Road and Ravens Rock Road should be sought given the scale of redevelopment proposed. The applicant should liaise with the Council's Parks and Landscape Services and Transportation Planning sections in this regard.

3.1.14 Response

The landscape architecture proposals have been specifically developed to complement the Council's investment in planting for the verge areas around the site. A meeting was held with the Council's Parks department to discuss the important details of planting provision.

3.1.15 Car parking

The quantity of car parking / storage proposed is considered insufficient. A car parking ratio of 1:1 is recommended. Bicycle parking should provide for 'Sheffield' type spaces that cater for a range of users. Servicing should occur internally within the site; the provision of a loading bay on Ravens Rock Road at the expense of the public realm is not acceptable. The applicant should note that a parking provision of 0.5 spaces per unit is unlikely to be supported by DLR Transportation.

3.1.16 Response

This issue was raised in Item 11 of the Board's Additional Information items noted above.

This SHD Planning application includes a comprehensive Traffic & Transport Assessment (T&TA) prepared by Waterman Moylan Consulting Engineers Ltd. Section 10 of the Report provides a detailed analysis of car parking policy and provision.

3.1.17 Surface Water Drainage

Further detailed information is required in respect of surface water drainage and flood risk, which should be resolved prior to the making of a prospective planning application.

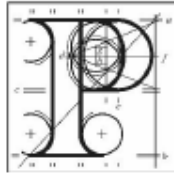
3.1.18 Response

As noted above, this SHD application package includes a suite of comprehensive engineering reports prepared by Waterman Moylan Consulting Engineers. Section 4 of the Waterman Moylan Engineering Assessment Report addresses Surface Water Drainage. A Flood Risk Assessment Report (FRA) is also included in the application documentation.

4 Conclusion

The opinion issued by An Bord Pleanála stated that the documents submitted with the request to enter into consultations constituted a reasonable application basis for an application for strategic housing development. The above details indicate that all of the additional documentation raised by the Board has been fully complied with.

Appendix A ABP Ref. 308186-20 Notice of Pre-Application Consultation Opinion



An
Bord
Pleanála

**Case Reference:
ABP-308186-20**

**Planning and Development (Housing) and Residential Tenancies Act 2016
Notice of Pre-Application Consultation Opinion**

Proposed Development: 233 no. apartments, creche and associated site works.

Junction of Ravens Rock Road and Carmanhall Road, Sandyford, Dublin 18.

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

1. Development Strategy

Further consideration/justification of the documents as they relate to the Dun Laoghaire Rathdown Development Plan 2016-2022, specifically Appendix 15: Sandyford Urban Framework Plan, in relation to the scale, height, and design of the proposed development and the potential impact on the adjoining sites and surrounding environs of Sandyford. The further consideration/ justification should

address the proposed design and massing, inter alia the visual impact, and relate specifically to the justification for any material contravention of the density and height strategy in the development plan, issue of legibility, visual impact, and compliance with Section 3.2 of the Urban Development and Building Heights: Guidelines for Planning Authorities (2018). The further consideration of these issues may require an amendment of the documents and/or design proposal submitted.

2. Residential Amenity

Further consideration and/or justification of the documents as they relate to future residential amenity, having particular regard to the following:

- Permeability of the block for pedestrians and movement strategy within and around the blocks, including consideration of interface with and passive surveillance of paths along the eastern and southern boundary, and legibility of the pedestrian entrances to the development.
- The quantum and quality of communal open space including the availability of sunlight and daylight to the courtyard, roof gardens, and the functionality of the spaces, including the 'pocket park'.
- Sunlight and daylight within the apartments.
- The further consideration of dual aspect units having regard to the requirements of the Sustainable Urban Housing Design Standards for New Apartments (2018), SPPR 4. Further justification required in terms of residential amenity, consideration of outlook, and access to daylight/sunlight.
- Access to community and social infrastructure, open space and amenities, in the wider area.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. Consider further the permeability of the blocks, pedestrian movement strategy between blocks, interface and access to podium level open space, clarity in relation to level changes, interface with proposed new streets, and potential conflict between pedestrians and vehicles using the basement access ramp/street'.
2. Detail and justification of location and quantum of resident support facilities and resident services and amenities as defined by the Sustainable Urban Housing Design Standards for New Apartments Guidelines (2018) and accessibility/ease of access to those spaces by future residents.
3. Further detail and consideration of works required to the public realm, including the 'linear greenway' required under the SUFP along Carmanhall Road and footpath network along Ravens Rock Road, including a letter of consent from the planning authority in relation to any areas in their ownership.
4. Further consideration of the interface of ground level apartments with Ravens Rock Rock and with the ramp to the basement car park.
5. Details of boundary treatment across the site.
6. Detailed quantum and design of open space proposals at all levels including consideration of issues related to wind micro-climate, design, and usability of spaces, in particular at the upper levels, and any implications of the blue roof design.

7. Identify provision of segregated play space for the proposed childcare facility, interface of such a facility with communal open space, and consideration of access to sunlight/daylight in the childcare facility.
8. Rationale in relation to the mezzanine levels proposed in the design of the apartments and childcare facility.
9. Detailed Arboricultural Assessment.
- 10.A Social and Community Audit
11. Provide further justification for the level of car and cycle parking proposed and detail the design of cycle parking spaces and secure storage areas. The justification should include an analysis of car and cycle parking demand that is likely to be generated by the proposed development taking account of the locational context and level of connectivity (by all modes) to services and employment generators.
12. Provide updated Sunlight and Daylight Analysis (based on a representative sample of units that includes assessment of worst-case scenarios); updated Wind and Microclimate Analysis (including details of any proposed mitigation measures); and an Inward Noise Assessment.
- 13.A Materials Strategy that details all materials proposed for buildings, open spaces, paved areas and boundaries. This strategy shall include details of the colour, tone and texture of materials and the modelling and profiling of the materials on each block. The documents should also have regard to the durability of materials and the long-term management and maintenance of the proposed development.

14. A Housing Quality Assessment that provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculations and tables required to demonstrate compliance of the various requirements of the 2018 Guidelines on Design Standards for New Apartments.
15. A Building Life Cycle Report that includes an assessment of the long term running and maintenance costs associated with the development in accordance with Section 6.13 of the 2018 Guidelines on Design Standards for New Apartments.
16. A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority.
17. Information for the purposes of screening for EIA as set out in schedule 7A of the Planning and Development Regulations 2001 (as amended) where the application is not accompanied by a full EIAR. The information should be submitted as a standalone document and refer to the potential for cumulative effects in conjunction with other permitted and planned housing and road developments in the area.
18. A detailed Construction Environmental Management Plan.
19. A building life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban housing: Design Standards for New Apartments (2018). The report should have regard to the long term management and maintenance of the proposed development.
20. Response to issues raised by the Transportation, Drainage Planning, and Parks Divisions of Dun Laoghaire Rathdown County Council, as per the

reports submitted in Appendix C of the Planning Authority Report, received 15th September 2020.

21. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority
4. The relevant Childcare Committee

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions

under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Tom Rabbette
Assistant Director of Planning
,2020

