

RESPONSE TO AN BORD PLEANÁLA OPINION

In respect of

**PROPOSED RESIDENTIAL DEVELOPMENT AT A SITE LOCATED AT CITYWEST
SHOPPING CENTRE, FORTUNESTOWN, DUBLIN 24**

Pre-Application Reference No. - ABP-304454-19

Prepared on behalf of

OBSF(I) Limited
10 Earlsfort Terrace
Dublin 2
D02 T380

By

TOM PHILLIPS + ASSOCIATES
Town Planning Consultants
80 Harcourt Street
Dublin 2
D02 F449

in association with

John Fleming Architects

Park Hood Landscape Architects

DBFL Consulting Engineers

AXISENG Consulting Engineers

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Table of Contents

1.0	INTRODUCTION.....	2
2.0	RESPONSE TO ISSUES RAISED BY ABP.....	2
2.1	ARCHITECTURAL RESPONSE OF BLOCK E & F.....	3
2.1.1	ABP’s Requirement:.....	3
2.1.2	Applicant’s Response.....	3
2.2	ARCHITECTURAL RESPONSE OF BLOCK A AND REAR OF THE SHOPPING CENTRE.....	4
2.2.1	ABP’s Requirement:.....	4
2.2.2	Applicant’s Response.....	4
2.3	CAR PARKING AND ACCESS.....	6
2.3.1	ABP’s Requirement:.....	6
2.3.2	Applicant’s Response.....	6
2.4	OPEN SPACE.....	7
2.4.1	ABP’s Requirement.....	7
2.4.2	Applicant’s Response.....	8
2.5	RESIDENTIAL AMENITY.....	8
2.5.1	ABP’S Requirement.....	8
2.5.2	Applicant’s response.....	9
3.0	RESPONSE TO ISSUES RAISED BY SDCC.....	10
3.1	Need for Permeability between Blocks E and F, and Citywest Road.....	10
3.1.1	Applicant’s Response.....	10
4.0	OTHER ISSUES.....	12
5.0	CONCLUSION.....	13

1.0 INTRODUCTION

This Response addresses issues raised by An Bord Pleanála (ABP) and *South Dublin County Council (SDCC)* during the pre-application consultation stage of the subject SHD application (ABP Ref. ABP-304454-19). Specifically, it outlines how the Applicant has addressed the issues highlighted in the ABP Opinion of 15th July 2019. In addition, issues raised in South Dublin County Council's (SDCC) pre-application S.6 (4)(b) report are addressed, along with any other matters discussed during the tripartite pre-application consultation meeting of 24th June 2019.

2.0 RESPONSE TO ISSUES RAISED BY ABP

In its Opinion of 15th July 2019, ABP stated that the documentation submitted as part of pre-application consultation required further consideration and amendment in order to constitute a reasonable basis for an SHD application. Specifically, it required that the following issues be addressed:

1. Further consideration of the design strategy of the site, in particular of Blocks E and F, with regard to the 'District Landmark' designation.
2. Further consideration of the elevation treatment of the rear of the shopping centre and Block A.
3. Further consideration for a reduction in the provision of surface car parking, high quality pedestrian and cycle through routes, enhanced with landscaping. Consideration for a second vehicular access through the site from Citywest Road.
4. Further consideration of public open space provision, integration with the District Park and integration of Surface Water Drainage Systems (SuDS).
5. Further consideration of the impact of shadow projection on existing residential properties in the vicinity of the site and the daylight provision for the proposed apartments. Consideration of the location and size of the proposed creche and need for future community services within the Citywest campus.

In addition, a number of specific information items were requested as follows:

1. Site Layout plan with site plan boundary;
2. Demonstration of the requirement and/or suitability of a second vehicular access for the proposed development;
3. A detailed schedule of accommodation;
4. A report that addresses issues of residential amenity;
5. A Building Lifecycle Report;
6. Additional CGIs/ visualisations/ 3D modelling;
7. Traffic Impact Assessment;
8. Report of surface water drainage;
9. Social Audit;
10. Details of public lighting;
11. Details of Part V provision;
12. A plan of the proposed open space within the site;
13. A detailed phasing plan;
14. A Taking in Charge plan;
15. A Material Contravention Statement.

These are addressed in detail below.

2.1 ARCHITECTURAL RESPONSE OF BLOCK E & F

2.1.1 ABP's Requirement:

“Further consideration and/or justification of the documents as they relate to design and expression, in particular, of Block E & F. In this regard, the prospective applicant should satisfy themselves that the design strategy for the site as it relates most importantly to the designation in the development plan, as a “District Landmark”, is the optimal architectural solution for this strategic gateway site. The proposed development shall have regard to inter alia, national policy including the 12 criteria set out in the Urban Design Manual which accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009. In this regard further consideration is required for the design and configuration of the layout particularly in respect of the nature and scale of the built form, the use of external materials which respects the receiving environment and the orientation of blocks as they address the Fortunestown Lane, the junction of Fortunestown lane and City West Road and the existing commercial development on the associated land holding. Further consideration of these issues may require an amendment to the documents and/ or design proposals submitted”.

2.1.2 Applicant's Response

In response to the comments received with regard to Blocks E and F, the design team reconsidered the approach to the development of the northern portion of the site. The presence of the Irish Water wayleave, which bisects this part of the site necessitated the retention of two separation building blocks, however the architectural design and form of these blocks was amended in order to more appropriately respond to the landmark status of the site as required by the Fortunestown LAP.

The proposed apartment blocks are now presented in a curved formation which mirrors the façade of the Citywest Shopping Centre to the immediate south of the blocks. In order to add visual interest and to contribute to the landmark status of the site, the architect has introduced the concept of ‘sliding blocks’ which will provide a memorable architectural form at this prominent location.

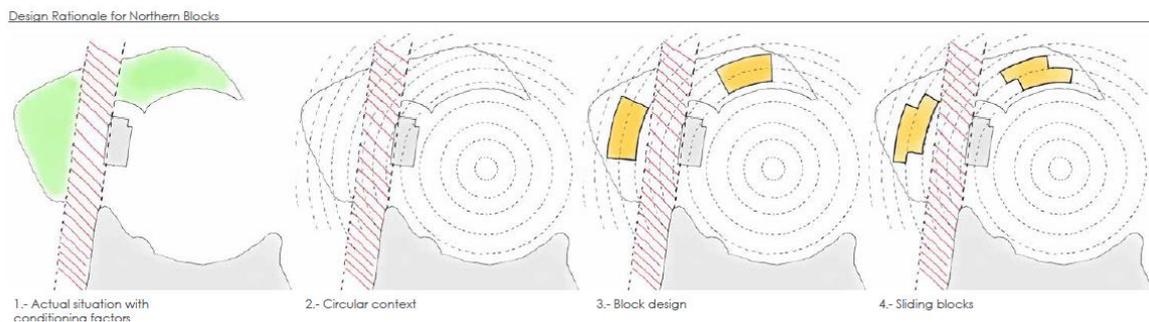


Fig. 1: Design rationale for northern blocks (Source, JFA Design Statement)

Important viewpoints are retained and enhanced with the Shopping Centre remaining clearly visible through the blocks and from the junction of Citywest Road and Fortunestown Lane. The inclusion of a kiosk café unit within Block F, which is glazed and circular in form, is sympathetic to the shopping centre which includes numerous circular features on its façade and at roof level.

As Blocks E and F will now form the entrance to this District Centre site, it is proposed to provide commercial uses at ground floor level with residential uses provided at the upper floors.

The omission of the previously proposed partial basement at Block E now ensures a more positive relationship between the block and the streetscape at ground floor. Some 3 no. retail units are proposed within the ground floor of Block E, with 1 no. retail unit and 2 no. café / restaurant units provided within Block F with ample opportunities to provide outdoor seating areas. The proposed landscaping treatment will create a plaza type environment suitable for this urban location with high quality planting and a play area, which will be well overlooked. Thus, it is now submitted that Blocks E and F provide a strong urban edge for the scheme at this location.

A simple palette of materials is proposed with large glazed elements and the use of brick with additional visual interest provided by aluminium panels and timber cladding. A comprehensive overview of the design rationale for the proposal is provided within the *Design Statement* provided by John Fleming Architects. This includes a detailed review of the way in which the scheme responds to the 12 urban design criteria as set out in the *Urban Design Manual* which accompanies the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009*.

Whilst the orientation of the proposed blocks E and F is relatively unchanged, the introduction of additional active ground floor uses provides a more positive relationship with Fortunestown Lane and the junction of Fortunestown Lane and Citywest Road. The previously proposed wall boundary treatment has been removed in order to open up the blocks to the streetscape. The provision of an external seating area adjacent to the café / restaurant units will bring additional activity to the area and is reflective of the café / restaurant uses located immediately to the south within the shopping centre.

2.2 ARCHITECTURAL RESPONSE OF BLOCK A AND REAR OF THE SHOPPING CENTRE

2.2.1 ABP's Requirement:

"Further consideration and/or justification of the documents as they relate to the elevation treatment of the rear of the shopping centre and Block A. In this regard, further consideration for the treatment of the shopping centre onto a proposed plaza along the north, integration of appropriate screening to the rear of the shopping centre and the treatment of the ground floor of Block A, relative to the shopping centre and plaza, is required. Further consideration of these issues may require an amendment to the documents and/ or design proposals submitted".

2.2.2 Applicant's Response

The rear elevation of the Citywest Shopping Centre comprises aluminium panels, which would not present an ideal visual appearance when viewed by residents within the proposed Block A. The initial proposal for the treatment of the rear elevation of the shopping centre comprised the insertion of 300 x 150mm cedar posts inset into a supporting steel structure with additional cedar cladding.

Following the receipt of the Opinion from An Bord Pleanála, and the recognition of the need to improve the interface between the shopping centre and the proposed Block A, the design team proposed the use of a green 'living' wall in order to enliven and enhance the rear elevation of the shopping centre.

The south facing orientation of the Shopping Centre provides an ideal opportunity to create a living wall at this location. The provision of a green wall of this scale will not only add colour and visual interest, but will also create many health and environmental benefits and accords with the overall biophilic approach which was taken with regard to the landscaping proposal for the scheme. Furthermore, the green wall will provide additional insulation for the shopping centre reducing demands on heating and AC systems. Additional information regarding the proposed green wall is provided on JFA Drawing No. P-9-007 and the *Building Lifecycle Report*.

The existing rear entrance to the shopping centre will be enhanced through improved hard landscaping, planting and the provision of seating walls. The provision of a green link from the entrance to the site from Fortunestown Lane, towards the rear of the Shopping Centre and then towards the district park to the south, will bring additional activity to the area and improved footfall to this underutilised part of the site.

The ground floor of Block A includes a generously sized resident amenity facility which aligns with the rear entrance to the shopping centre, further enhancing a sense of vibrancy and activity at this location. There are just 2 no. north facing apartments located at ground floor level of Block A. Both apartments are significantly larger than the minimum floor area of 45 sq m as required by the *Apartment Guidelines* with Apartment A 0.01 being 26% larger and apartment A 0.07 being 17% larger than the minimum area required. In addition, the private terrace for apartment A 0.01 is 2 sq m larger than required and the terrace for apartment A 0.07 is 4.8 sq m larger than required. It is therefore considered that an appropriate level of amenity will be afforded to future residents by these larger unit sizes and generous private open space, in addition to the visual improvements presented by the green wall to the shopping centre.



Fig. 2: Visual of proposed green wall (Source: 3S Design Bureau, 2019)

2.3 CAR PARKING AND ACCESS

2.3.1 ABP's Requirement:

"Further consideration and/or justification for a reduction in the provision of surface car parking, integration of high quality pedestrian and cycle through routes, enhanced with landscaping. In light of any reduction in surface car parking and/or provision of alternatives, further consideration and/or justification for a second vehicular access through the site from Citywest Road, will be provided for in any Traffic Impact Assessment".

2.3.2 Applicant's Response

It was initially proposed to provide a total of 210 car parking spaces to serve a total of 297 no. apartments, which equates to a ratio of 0.66 spaces per unit. Given the urban location of the site and easy access to high quality public transport, it was advised at pre-application consultation stage that a reduction in car parking spaces should be considered. It is now proposed to provide a total of 153 no. spaces to serve the development, which equates to a parking ratio of 0.51 spaces per apartment unit.

The northern plot car parking ratio equates to 0.46 spaces per apartment whilst the southern plot car parking ratio equates to 0.53 spaces per apartment, which is considered appropriate given the closer proximity of the northern plot to the Fortunestown Luas station. A comprehensive overview of the car parking strategy for the site is provided in the *Traffic and Transport Assessment* as prepared by DBFL.

Car parking was also reduced in order to allow additional space for the provision of two high quality green links within the site as requested during the pre-application consultation process. A green link comprising a mix of dedicated cycle lanes and pedestrian footpaths, in addition to cycle and pedestrian shared surface is provided from the main entrance to the scheme on Fortunestown Lane, and from the secondary entrance on Citywest Road. These green links both provide easy access through the site towards the District Park. Further information regarding the nature of the green links is provided within the *Traffic and Transport Assessment*.

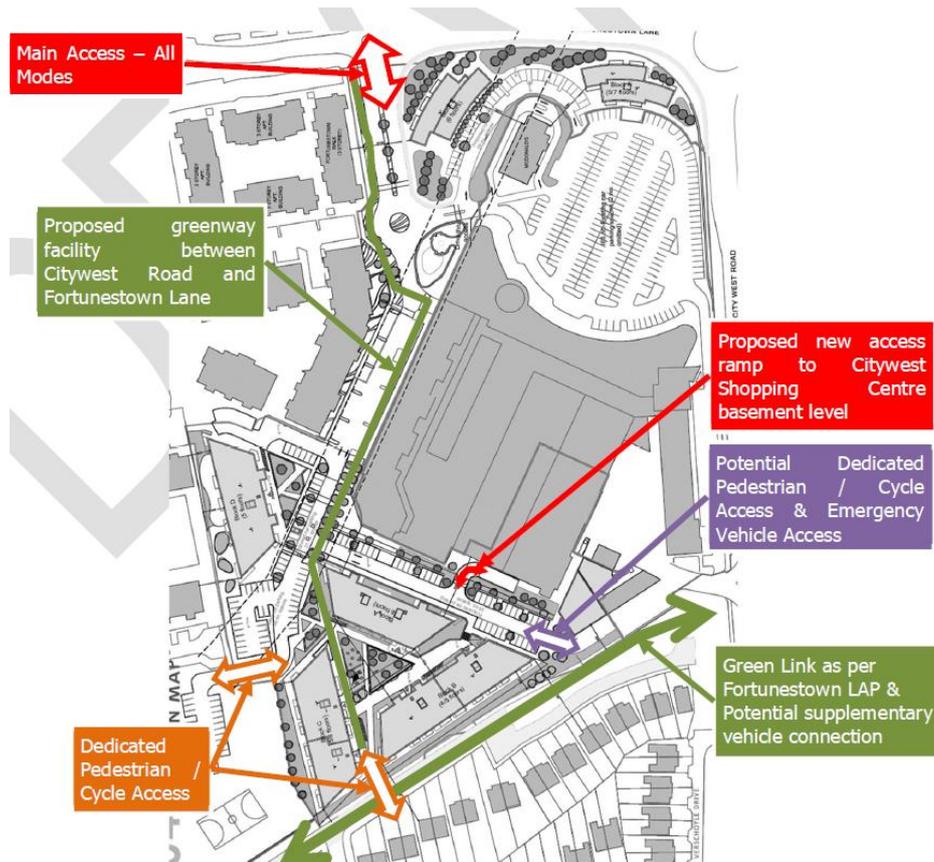


Fig. 3: Site Access Strategy (Source: Traffic and Transport Assessment, p. 33, DBFL)

As requested within the Opinion received by An Bord Pleanála, the potential need for a second vehicular access to the site was examined. The *Traffic and Transport Assessment* demonstrates that an additional full vehicular access is not required, however an additional access is proposed from Citywest Road for emergency vehicles and pedestrians / cyclists. Removable bollards will be provided at this location prohibiting all other vehicles from entering / exiting the subject development site at this location except in the event of an emergency situation which prevents access / egress via the main vehicular access on Fortunestown Lane. It is not considered appropriate that this access be permanently open as this may lead to motorists taking a short cut through the residential scheme to access Fortunestown Lane.

2.4 OPEN SPACE

2.4.1 ABP's Requirement

“Further consideration and/or justification of the documents to satisfactorily indicate the provision of high quality open space provision, incorporating a strategic link through the site and integration with the District Park to the south. Further consideration in the documents indicating the integration of surface water proposals which respect the nature and form of the proposal and support the integration of Surface Water Drainage Systems (SuDS)”.

2.4.2 Applicant's Response

As detailed during the pre-application consultation process, it is considered that the public open space requirements for the site have been met under the parent permission for the development of the Citywest Shopping Centre and associated residential development (Reg. Ref. SD03A/0857) and subsequent linked permission for a public park (Reg. Ref. SD08A/0347). The latter permission was sought as a result of Condition 4 as placed on the parent permission, which required the submission of a programme of works for the provision of recreational amenities for the area. Although the majority of the residential development (totalling 380 no. units) did not proceed, the Applicant received permission for a public park (Reg. Ref. SD08A/0347), which is now complete. As such, it is submitted that the open space obligations associated with the Citywest Shopping Centre site have been delivered through the provision of the parklands to the south west.

The proposed development will enhance access to the district park through the provision of two dedicated green links to the park and the improvement of passive surveillance over the area as a result of the increased footfall and residential blocks, which will overlook the park area. This will ensure that improved wayfinding is facilitated allowing better integration between the proposed scheme and the park. In addition, high quality areas of communal open space are provided throughout the site providing a number of opportunities for active and passive recreation. Proposed open space amenities will include a toddler play area, seating areas, outdoor gym, green spaces and a play area for older children. Please see the accompanying *Landscape Masterplan* and *Open Space Provision* drawings, in addition to the *Landscape Design Report* as provided by Park Hood Landscape Architects for a more detailed overview of the open space and landscape strategy for the site.

The site's surface water management infrastructure has been designed in accordance with the Greater Dublin Strategic Drainage Study (GSDSDS) and in consultation with South Dublin County Council Water Services section. A number of SuDS methodologies are proposed for the site including green roofs across all blocks, permeable paving, tree pits connected to road gullies, attenuation systems and flow control devices and separators. Full details regarding the SuDS strategy for the site are provided within the *Infrastructure Design Report* as provided by DBFL.

2.5 RESIDENTIAL AMENITY

2.5.1 ABP'S Requirement

"Further consideration and/or justification of the documents as they relate to the impact of shadow projection on existing residential properties in the vicinity of the site and the daylight provision for the proposed apartments. Consideration and/or justification should also be provided for the location and quantum of the crèche, included within a phasing plan, and the requirement for future community services within the Citywest campus".

2.5.2 Applicant's response

A detailed *Sunlight and Daylight* report has been undertaken by Axiseng Consulting Engineers which examines the potential impact of shadowing and changes to the Vertical Sky Component (VSC) for adjacent residential properties. In addition, the report examines access to sunlight with regard to existing and proposed outdoor amenity spaces and the Average Daylight Factors within proposed apartment units. With regard to the potential impact of shadowing, a number of existing schemes were examined as shown below in Fig. 4:



Fig. 4: Location of adjacent residential schemes (Source: Sunlight & Daylight Report, Axiseng)

The Report finds the following:

- There is no change in shading to the Carrigmore Apartment Buildings as a result of the proposed development including Block C and D.
- There is a minor shading impact to the front of the Fortunestown Apartment Block 1 and the rear of Fortunestown Apartment Block 2 as a result of the proposed development.
- There is a minor shading impact to the rear of the Citywest Apartment Block
- There is no change in shading to the Residential Houses situated on Verschoyle Drive.
- There is no change in shading to the existing outdoor space and playground.

With regard to the changes to VSC values, the overall changes are described as minor to negligible with less than less than 1.5% of total windows experiencing a substantial adverse impact, while less than 4% of total windows would experience a moderate adverse impact and 11% of total windows experiencing a minor adverse impact compared to 85% of total windows experiencing a negligible impact.

The Report finds that the daylight provision to proposed apartments is excellent with approximately 99% of habitable units being well illuminated and in the line with minimum daylight factor, with the rest of units achieving daylight factor borderline to the target.

All existing and proposed outdoor amenity spaces also comply with the BRE's 2011 guidance document 'Site Layout - Planning for Daylight and Sunlight' recommendation whereby 50% of the space will receive at least two hours of sunlight during the course of the day.

The childcare facility is c.265 sqm and will accommodate 71 no. children. The location of the facility within the ground floor of Block D has been selected due to its location away from the more active/commercial parts of the site and its proximity to the District Park and set down facilities. The creche will be constructed during the second phase of construction and it is expected that it will be operational following first occupation of the scheme.

Following the receipt of the Opinion of An Bord Pleanála (ABP Ref. 304454-19), the Applicant engaged with the South Dublin County Childcare Committee (SDCCC) regarding existing childcare provision and demand in the area. SDCCC advised that they do not hold current local needs analysis data or the need for provision of early years services, however it was suggested that there was local demand for childcare services for the 0 – 1 year group. In this regard, we note that this age group generally requires a higher staff and floorspace ratio, and it is therefore considered that the proposed childcare facility has been appropriately sized and will provide sufficient flexibility to meet demand.

A *Social and Community Infrastructure Audit* has been undertaken by Tom Phillips + Associates and accompanies this planning application. The Audit concludes that there are no significant gaps in the existing social provision serving the catchment area. In addition, the proposed development will enhance the existing amenity of the area through the provision of residential amenity facilities (providing a gym, screen room and lounges), a childcare facility and additional retail units and café/ restaurant units.

3.0 RESPONSE TO ISSUES RAISED BY SDCC

In addition to the issues raised by ABP in their Opinion dated 10th August 2018, we note that South Dublin County Council's S.6(4)(b) submission documents to the Board contain various items of detail. We address these issues raised by South Dublin County Council (SDCC) below where they are not already covered by the above numbered items from An Bord Pleanála's Opinion.

3.1 Need for Permeability between Blocks E and F, and Citywest Road

It was the opinion of SDCC that there was poor interaction and permeability between Blocks E and F and Citywest Road.

3.1.1 Applicant's Response

The Application has considered the views of SDCC with regard to the need to provide good permeability and active frontages at the Citywest Road interface. In this regard, further design work and amendments to the layout have been undertaken which results in the provision of a pedestrian access between the Blocks and Citywest Road. In addition, as discussed in Section 2.1.1 above, the provision of retail and commercial units immediately adjacent to Citywest Road will contribute to a sense of vibrancy and vitality at this key location at the entrance to the Shopping Centre campus.

The boundary treatment at this location has been carefully considered with regard to the concerns from SDCC that the proposed wall and soft landscaping serve to ‘wall off’ the scheme from the adjacent road. In response to this issue, the use of a formal boundary treatment has been removed from this location in favour of high quality hard landscaping and planting. This is most clearly demonstrated by the below comparison of the previously proposed scheme and the current proposal.



Fig. 5: Previously proposed Block E (Source: 3D Design Bureau)



Fig. 6: Current proposal for Block E (Source: 3D Design Bureau)

In addition to the introduction of a high quality public realm adjacent to Citywest Road, the proposed Blocks now include additional active uses to include shop and café uses. In addition, a distinct cylindrical kiosk unit will be located within Block F which marks the entrance to the scheme and owes its design from the curved façade of the shopping centre to the rear.

4.0 OTHER ISSUES

In addition to the items outlined above, we note that ABP's Opinion required that the following be submitted with an application

1. *Site Layout plan with site plan boundary;*

A Site Layout Plan (JFA Drawing Ref. P-R-001) is enclosed with architectural drawing pack as prepared by John Fleming Architects.

2. *Demonstration of the requirement and/or suitability of a second vehicular access for the proposed development;*

This issue is discussed within Section 6 of the *Traffic and Transport Assessment* as provided by DBFL Consulting Engineers.

3. *A detailed schedule of accommodation;*

A *Schedule of Accommodation* and *Housing Quality Assessment* has been provided by John Fleming Architects and is included within the *Schedules Document*.

4. *A report that addresses issues of residential amenity;*

A summary discussion of issues regarding residential amenity is included within the *Social and Community Infrastructure Audit* as prepared by Tom Phillips + Associates.

5. *A Building Lifecycle Report;*

A *Building Life Cycle Report* has been prepared by John Fleming Architects and is provided with this planning application.

6. *Additional CGIs/ visualisations/ 3D modelling;*

A *Photomontage and CGI Booklet* has been prepared by 3D Design Bureau and accompanies this planning application.

7. *Traffic Impact Assessment;*

A *Traffic and Transport Assessment* has been provided by DBFL Consulting Engineers and accompanies this planning application.

8. *Report of surface water drainage;*

A report regarding surface water drainage is included within Section 3 of the *Infrastructure Design Report*.

9. *Social Audit;*

A *Social Audit and Residential Amenity Report* has been prepared by Tom Phillips + Associates and is included with this planning application.

10. *Details of public lighting;*

Details of Public Lighting have been provided by AXISENG Consulting Engineers. See enclosed Public Lighting drawings and *Public Light Report*.

11. *Details of Part V provision;*

A copy of the Part V proposals including a schedule of accommodation, plans and indicative costings with a letter from SDCC stating acceptability in principle of the proposal is enclosed.

12. *A plan of the proposed open space within the site;*

A plan of the proposed open spaces has been prepared by Parkhood Landscape Architects and is included within the landscape drawing pack.

13. A detailed phasing plan;

A Phasing plan is included within the *Outline Construction Management Plan* which has been prepared by DBFL Consulting Engineers.

14. A Taking in Charge plan;

As the scheme is not proposed to be taken in charge, A Taking in Charge Plan is not required.

15. A Material Contravention Statement.

A *Material Contravention Statement* has been prepared by Tom Phillips + Associates and is enclosed with this planning application.

5.0 CONCLUSION

We consider that all issues that have been raised during pre-application consultation have been successfully addressed in the proposal now before the Board.

The subject proposal represents the opportunity to deliver a significant quantum of much needed residential accommodation in Citywest in addition to an improved public realm, pedestrian and cycle linkages and commercial / amenity facilities.