



<b>Case Reference / Description</b>	Demolition of all buildings excluding the Former Player Wills Factory, construction of 331 no. shared living units, 466 no. Build to Rent residential units, childcare facility and associated site works. Former Player Wills Site, South Circular Road, Dublin 8.		
<b>Case Type</b>	Section 5 Pre-Application Consultation Request		
<b>Date:</b>	15 <sup>th</sup> July 2020	<b>Start Time</b>	9.30 am
<b>Location</b>	Via Microsoft Teams	<b>End Time</b>	10.40 am
<b>Chairperson</b>	Tom Rabbette	<b>Senior Executive Officer</b>	Cora Cunningham

**Representing An Bord Pleanála:**

Tom Rabbette, Assistant Director of Planning
Una O'Neill, Senior Planning Inspector
Cora Cunningham, Senior Executive Officer

**Representing Prospective Applicant:**

Finghin Curraoin, Henry J. Lyons
James Miles, KPF
Allanah Murphy, Systra
Ciaran O'Rafferty, BMCE
Paula Galvin, McCutcheon Halley
Simon Ronan, NMP

**Representing Planning Authority**

Carol Smyth, Executive Planner
Maria Treacy, Executive Engineer
David Conway, Executive Engineer
Mary Conway, Deputy City Planner

## **Introduction**

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, Planning Authority (PA) via Microsoft Teams having regard to the Covid-19 virus.

The procedural matters relating to the meeting were as follows:

- The written record will be placed on the pre-application consultation file and will be made public, along with that file, should an application arise following the conclusion of this consultation process,
- ABP received a submission from the PA on 15<sup>th</sup> June, 2020 providing the records of consultations held pursuant to section 247 and its written opinion of considerations related to proper planning and sustainable development that may have a bearing on ABP's decision,
- The consultation meeting will not involve a merits-based assessment of the proposed development,
- The meeting will focus on key site-specific issues at strategic overview level, and whether the documents submitted require further consideration and/or amendment in order to constitute a reasonable basis for an application.
- Key considerations will be examined in the context of the statutory development plan for the area and section 28 Ministerial Guidelines where relevant,
- A reminder that neither the holding of a consultation or the forming of an opinion shall prejudice ABP or the PA concerned in relation to any other of their respective functions under the Planning Acts or any other enactments and cannot be relied upon in the formal planning process or in legal proceedings.

The ABP representatives acknowledged the letter dated 14<sup>th</sup> May, 2020 formally requesting pre-application consultations with ABP. Prospective applicant advised of the need to comply with definition of SHD as set out in the Act of 2016, in relation to thresholds of development. It was also noted that the Inspector dealing with the pre-application consultation request would be different to who would deal with the application when it was submitted. Recording of the meeting is prohibited.

## **Agenda**

- 1. Shared Living Accommodation – layout and amenity; quantum and distribution of residential facilities.**
- 2. BTR and Residential Amenity – layout and amenity; adjoining properties to the east.**
- 3. Building Height Strategy – Design of Taller Buildings.**
- 4. Surface Water Management.**
- 5. Traffic and Transportation issues raised by PA.**
- 6. Parks/Landscape issues raised by PA.**
- 7. Any Other Matters.**

## 1. Shared Living Accommodation – layout and amenity; quantum and distribution of residential facilities.

### ABP Comments:

- Clarity in relation to terminology used to describe proposed development – bedspaces versus units, single versus double occupancy
- Basis for chosen quantum and distribution of communal living/kitchen areas per bedspace is not clear, clarify in application number of satellite kitchens proposed, consider including more, consider their locations, PA Opinion raises concern in relation to distance from some units to kitchen facility
- Clarify quantum and distribution of the shared living and kitchen facilities proposed for the individual units significantly higher than precedents quoted
- Clarify calculations submitted regarding what is included in kitchen and amenity areas, address inclusion of bin stores/laundry rooms/public WCs in the communal kitchen/living area
- Address issues relating to layout of communal kitchen and usability of entrance corridors
- Address amenity of units looking into the central courtyard and level of overshadowing of central courtyard
- Justify functionality and operation of the communal kitchen/living spaces in the format proposed
- Submit details relating to operational management at application stage
- Documentation details flexibility and potential for single bed units to be converted in the longer term to apartments through amalgamation of two adjoining units, there are limitations due to single aspect nature of the units and private amenity space amalgamating these units is not entirely without problems
- ABP have conditioned other applications to increase facilities
- Ensure public notices refer to shared accommodated and number of bedspaces proposed

### Prospective Applicant's Comments:

- Co-living proposed
- Block PW1 tenant amenity derived from existing developments
- Had regard to international operational facilities, some basic and some more spacious
- 5 units per kitchen proposed
- Amenity space 1.7sqm per bedspace, will clarify in application
- Bin store and laundry included in amenity area calculations
- Significant area of amenities proposed on various floors
- Single room occupancy proposed, double occupancy not currently proposed
- Will address all issues raised in application documentation
- Propose to provide bright and pleasant units, generous floor to ceiling height balances depth of plan
- New development respectfully inserted into old building
- Courtyards allow light to penetrate area

**Planning Authority's Comments:**

- PA have concerns in relation to the distribution of kitchens per unit and the distance that residents have to travel to.

**2. BTR and Residential Amenity – layout and amenity; adjoining properties to the east.**

**ABP Comments:**

- Documentation not clear in what resident support facilities are proposed, as per apartment guidelines, versus resident services and amenities. Rationale required for quantum proposed
- Address status of Masterplan for the area
- Layout of block PW2, results in dominance of long corridors with minimal natural light particularly at the eastern side
- Address percentage of dual aspect units, greater standards should be achieved, 50% equally applicable versus 33%. Amendments could address issues of overly long corridors
- Sunlight/Daylight analysis submitted indicates standards are met in the majority of cases, however, the floor layout with the long corridors, large number of single aspect units and the central courtyard arrangement will result in suboptimum level of residential amenity for future occupants
- Schedule of accommodation to be submitted, ensure in accordance with guidelines
- Address PA concerns raised in relation to PW4 and PW5

**Prospective Applicant's Comments:**

- Dual aspect: meeting 42% requirements, can justify in application as site sits between 2 definitions
- Justification can be provided due to location of site allowing dual aspect to be under 50%
- Tower areas can achieve dual aspect
- Significant work carried out to minimise shadow on apartments
- May be able to convert some units to dual aspect to bring closer to 50% requirement

**Planning Authority's Comments:**

- Non-statutory Masterplan for the area which has been presented to elected members who are satisfied with its content
- PA share ABP concerns especially in regard to corridor lengths and implications associated with them
- PA accept that site is located in inner city location

**3. Building Height Strategy – Design of Taller Buildings.**

**ABP Comments:**

- Masterplan sets strategy for area
- A material contravention statement has been submitted and this should be advertised as part of any application
- PA Opinion raises concerns in relation to the slenderness of the proposed towers, application documentation should include robust argument in relation to the slenderness ratio proposed
- Have regard to blocks PW4 and PW5

- Improve existing boundary with adjoining residents and not raise additional concerns

**Prospective Applicant's Comments:**

- Creating undulating profile across 2 sites
- Creating slenderness in taller elements
- Articulated and animating skyline profile
- Proposed development achieving appropriate density for the area
- Seeking balance having regard to the configuration of the towers and their slenderness
- Different materials will be used to help create slenderness and relate it back to the history and context of the proposed site and its architectural heritage
- Don't envisage overlooking given the separation distances between the proposed development and the adjoining gardens

**Planning Authority's Comments:**

- Height and slenderness issued raised in section 247 meetings
- Issues relating to architectural expression
- Scope for further refinement of towers, engage in further discussions with PA
- Have regard to the proposed development being visible from wider area
- Have regards to windows in block PW4 overlooking gardens on St. Catherine's Avenue
- Have regard to the use of translucent/frosted glass and the potential that at night-time the internal light will act like a lightbox over this residential boundary, address PA concern and illustrate in application
- PA require greater separation distances between new block and existing houses

**4. Surface Water Management**

**ABP Comments:**

- Address issues raised in PA Opinion at application stage

**Prospective Applicant's Comments:**

- Prospective applicant has engaged in further discussions with PA follow receipt of PA Opinion, strategy has been set out to address issues

**Planning Authority's Comments:**

- Revised approach has been agreed, further discussions to be held prior to lodging application

**5. Traffic and Transportation issues raised by PA.**

**ABP Comments:**

- Address issues raised in PA Opinion

**Prospective Applicant's Comments:**

- Prospective applicant has worked through issues raised by PA and have solutions, will follow up to further meeting with PA

**Planning Authority's Comments:**

- Further meeting has been arranged, anticipate issues can be resolved prior to lodging application

**6. Parks/Landscape issues raised by PA.**

**ABP Comments:**

- PA satisfied with overall proposals
- Bat Survey should be addresses in EIAR
- Phasing plan and delivery of central park/public open space provision

**Prospective Applicant's Comments:**

- Updated Bat Surveys to be carried out prior to lodging application
- Construction Management Plan will address phasing

**7. Any other matters**

**ABP Comments:**

- Robust argument/review is required in relation to proposed communal kitchen/living space proposed per bedspace
- Contiguous elevations and towers are shaded out, requires further consideration to ensure plans are legible for third parties
- Wind microclimate study required, to include review of balconies and upper level roof gardens
- Phasing plan for the development should be submitted

**Prospective Applicant's Comments:**

- PA Opinion refers to childcare facility details
- Demolition drawings will detail works being carried out on Player Wills Factory

**Planning Authority's Comments:**

- PA require details in relation to the layout and operation of childcare facility
- Player Wills Factory building not protected structure but under NIAH. Justification required for removal of all original staircases, amendments to east and west elevations proposed, and clarity in relation to all amendments proposed to the original fabric

## Conclusion

The representatives of ABP emphasised the following:

- There should be no delay in making the planning application once the public notice has been published
- Sample notices, application form and procedures are available on the ABP website
- Irish Water would like prospective applicants to contact Irish Water at [cdsdesignqa@water.ie](mailto:cdsdesignqa@water.ie) **between the Pre-Application Consultation and Application stages**, to confirm details of their proposed development and their proposed design.
- The email address to which applicants should send their **applications** to Irish Water as a prescribed body is [spatialplanning@water.ie](mailto:spatialplanning@water.ie)

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Tom Rabbette  
Assistant Director of Planning  
August, 2020