



An  
Bord  
Pleanála

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## Planning and Development (Housing) and Residential Tenancies Act 2016

### Notice of Pre-Application Consultation Opinion

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**Case Reference:** ABP-301733-18

**Proposed Development:** 101 no. apartments in three blocks (social housing units).  
High Park, Grace Park Road, Drumcondra, Dublin 9.

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 issue need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

#### **Residential Density**

Further consideration of the documents as they relate to the residential density of the proposed development. This consideration and justification should have regard to, inter alia, the minimum densities provided for in the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas', the updated 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities', the National Planning Framework and the relevant provisions of the Dublin City Development Plan 2016-2022. It should also have regard to the location of the development site close to Dublin City Centre and in an established residential area that is well served by public transport and has a wide variety of

services and amenities. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating to density and layout of the proposed development.

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. Photomontages, cross sections, visual impact analysis, shadow analysis and landscaping details to indicate potential visual impacts on Grace Park Road and on the setting of the protected structure High Park House and church and on the residential amenities of Grace Park Manor, Highfield healthcare facility and Beechlawn nursing home.
2. Clarification of any proposed connection to third party lands, e.g. key pad access, along with wayfinding measures within the development to promote use of same.
3. Rationale for proposed childcare provision (or lack of same) with regard to, inter alia, the 'Childcare Facilities Guidelines for Planning Authorities', circular letter PL 3/2016, and the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018), to provide details of existing childcare facilities in the area and demand for childcare provision within the proposed scheme. The applicant is advised to consult with the relevant Childcare Committee in relation to this matter prior to the submission of any application.
4. Development assessment of potential impacts on Dublin Port Tunnel, with regard to the requirements of Dublin City Development Plan 2016-2022 Appendix 6, the requirements of Transport Infrastructure Ireland (TII) as set out in its submission to An Bord Pleanála dated 2nd July 2018 and the TII document 'Guidance Notes for Developers. The assessment of surface and sub-surface developments in the vicinity of Dublin Port Tunnel'. Particular consideration is to be given to potential impacts associated with basement construction in the vicinity of the Port Tunnel.
5. Rationale for the proposed car parking provision with regard to Dublin City Development Plan 2016-2022 Table 16.1 car parking standards and the performance related approach set out in the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018) in relation to infill sites in urban areas.
6. Full auto track drawings of all proposed car parking areas.

7. An Archaeological Impact Assessment shall be submitted which responds to the comments outlined in the report received by the Board from the National Monuments Service which is attached and which includes consideration of potential archaeological impacts of the construction of basement car parks.
8. Appropriate Assessment screening report.

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:

- The Minister for Culture, Heritage and the Gaeltacht (Development Applications Unit, Wexford)
- The Heritage Council
- An Taisce
- An Chomhairle Ealaíon
- Fáilte Ireland
- Irish Water
- Transport Infrastructure Ireland
- National Transport Authority
- Dublin City 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.

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Tom Rabbette  
Assistant Director of Planning  
July 2018