



An
Bord
Pleanála

**Case Reference:
ABP-305128-19**

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: 438 no. Build to Rent apartments (408 no. apartments, 28 no. shared living units) and associated site works.

26 Parkgate Street, Dublin 8.

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 and / or justification of the documents as they relate to block structure; height, scale and mass of the blocks; and the architectural expression and detailing of the blocks, as follows:

- Further justification of the documents as they relate to the height of the 29-storey tower block, having regard to visual and skyline impacts;

- Further justification / consideration of the documents as they relate to the overall block structure and the relationship between the blocks (height / scale / massing / proportions).
- Further justification / consideration of the documents as they relate to the relationship with existing contiguous development, including but not limited to development on Parkgate Street to the north, the River Liffey to the south and the Parkgate Place development to the west; and
- Further justification / consideration of the documents as they relate to the architectural expression and detailing of the blocks, including but not limited to the materiality and composition of the blocks and the interface with streets and open spaces at ground level.

Regard should be had to the sites strategic and prominent location within the city and the need for an architectural design of exceptional high character and quality at this location. Regard should be had to the need to form a coherent and legible block structure within the site; to respond to the character and traditional architectural quality of the area; to provide a high-quality urban edge to the River Liffey and to Parkgate Street; and for a level of consistency in terms of architectural expression and materiality to create a distinctive character for the development overall.

The further consideration / justification should have regard to, inter alia, the guidance contained in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the accompanying Urban Design Manual, the Urban Development and Building Height Guidelines for Planning Authorities (2018); the Architectural Heritage Protection, Guidelines for Planning Authorities (2011); and the Dublin City Development Plan 2016-2022.

2. Housing Format

Further consideration and / or justification of the documents as they relate to the combination of 'Build to Rent' and 'Shared Accommodation' units within a single development. This consideration / justification should have regard to, inter alia, the distinct characteristics of both housing sectors and the guidance set out in the Sustainable Urban Housing Design Standards for New Apartments Guidelines (2018), Chapter 5 Build-To Rent and Shared Accommodation Sectors.

3. Communal Facilities / Residential Support Facilities

Further consideration and / or justification of the documents as they relate to the provision of communal open space, communal facilities and residential support facilities within the development including the quantum, quality, distribution and function of spaces and details in relation to the overall management of these areas. Particular regard should be had to the requirements of the Sustainable Urban Housing Design Standards for New Apartments Guidelines (2018), SPPR 7 Part (b) and the need to provide an evidenced based assessment in respect of residential services and amenities.

4. Residential Amenity

Further consideration and / or justification of the documents as they relate to future residential amenity, having particular regard to the provision of private amenity space to individual residential units; the portion of dual aspect and north facing units; daylight and sunlight access; micro-climate / wind impacts; and impact on the amenities of existing residential units. Particular regard should be had to the requirements of the Sustainable Urban Housing Design Standards for New Apartments Guidelines (2018), SPPR8 (ii) in relation to private amenity space and SPPR 4 and Section 3.18 in relation to the dual aspect ratio and north facing units.

5. Architectural Heritage

Further consideration and / or justification of the documents as they relate to impacts on architectural heritage and character, with particular regard to the level of intervention proposed to the riverside stone wall, the treatment of the entrance stone arch along the Parkgate Street frontage and proximity of the proposed blocks to the arch, and to the impact on the local historic context of Parkgate Street, Heuston Station and environs and along the Quays. This consideration / justification should have regard to, inter alia, the guidance set out in the Architectural Heritage Protection, Guidelines for Planning Authorities, 2011, and the guidance set out in the Dublin City Development Plan 2016-2022.

6. Principle of Development

Further justification of the documents as they relate to the overall mix of uses. This justification should have regard to, inter alia, the land use zoning objectives

pertaining to the site and the guiding principles for development in the Heuston Strategic Development Regeneration Area set out in the Dublin City Development Plan 2016-2022 (Chapter 15).

7. Childcare

Further consideration and / or justification of the documents as they relate to childcare provision having regard to the demands of the residential and commercial uses proposed, the level of existing childcare provision in the area and the site's strategic location and proximity to a multi-modal transport interchange.

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. An updated Architectural Design Statement. The statement should include a justification for the proposed development, having regard to inter alia urban design considerations, visual impacts, site context, the locational attributes of the area and national and local planning policy. The statement should specifically address the proposed block structure and the height, scale and mass of the blocks, the design relationship between the individual blocks within the site; the relationship with contiguous development and the interface along key frontages, having regard to the criteria set out in Chapter 3 of the Urban Development and Building Height Guidelines (2018) and in Chapter 16 of the Dublin City Development Plan. The statement should be supported by contextual plans and contiguous elevations and sections that details the relationship between the proposed blocks within the site and the relationship with existing contiguous development in the area.
2. 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 (including any cladding or framework system) on each block. The statement should present a justification for the materials being used having regard to the need for high quality and sustainable finishes that create a distinctive character for the development overall, whilst also responding to the character of the area. The documents should also have regard to the durability of materials and the long-term management and maintenance of the proposed development.

3. An updated Visual Impact Assessment that includes photomontages, cross sections, axiometric views and CGIs. The assessment should address the contribution of the tower block to the skyline and the impact on key views, including local views along Parkgate Street and in the vicinity of Heuston Station and Sean Heuston Bridge, along the Quays, from Phoenix Park, Island Bridge and Kilmainham to the west and from the wider historic areas of the City.
4. 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.
5. A schedule of the open space and communal facilities within the development clearly delineating public, semi-private and private spaces.
6. An updated Daylight and Sunlight Analysis.
7. 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.
8. Details of the management provisions for the Build to Rent and Shared Accommodation (where proposed) to include details of a covenant or legal

agreement as required under the SPPR 7 of the Sustainable Urban Housing Design Standards for New Apartments Guidelines (2018).

9. Details of Part V provision clearly indicating the proposed for compliance with Part V.
10. Details of vehicular access and servicing arrangements from Parkgate Street.
11. Details of surface and foul water drainage and water supply connections.
12. A Construction Management Plan and Construction Traffic Management Plan.
13. A site layout plan showing the extent of the Z5 and Z9 zoning objectives within the site.
14. A site layout plan, elevations and sections that detail existing residential development to the west and north and show the separation distances to opposing blocks, windows and balconies. The details should also detail the outlook from the proposed west facing residential units in Block C.
15. A detailed phasing plan for the proposed development.
16. A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority.
17. Details of public lighting.
18. 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. Transport Infrastructure Ireland
2. National Transport Authority
3. Coras Iompair Eireann
4. Commission for Railway Regulation
5. Irish Water
6. Irish Aviation Authority
7. Minister for Culture, Heritage and the Gaeltacht
8. Heritage Council
9. Inland Fisheries Ireland
10. An Chomhairle Ealaíon
11. Fáilte Ireland
12. An Taisce
13. 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.

Rachel Kenny/Tom Rabbette

Director of Planning/Assistant Director of Planning

,2019