



An
Bord
Pleanála

**Case Reference:
ABP-307314-20**

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: Demolition of existing buildings, construction of 105 no. apartments and associated site works.

No. 54 Glasnevin Hill and “Ardmore” with lands adjacent thereto, No. 38 Glasnevin Hill, No. 52 Glasnevin Hill, lands to the rear of Nos. 48, 50 and 52 Glasnevin Hill and Nos. 40 and 42 Glasnevin Village, 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 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.

Height/design

The prospective applicant should provide further justification and/or detail in relation to the proposed increase in height to blocks and detailed design of the proposed development. In particular, the prospective applicant should provide further

justification and/or detail in relation to the visual impact of the development upon the surrounding area. Further detail of elevational design is required, particularly at street level. It is noted that the proposed height of the development will materially contravene the Dublin City Council Development Plan 2016-2022 and as such will require consideration under criteria in section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities 2018. This includes consideration of topography, response to the scale of adjoining developments and integrating in a cohesive manner. Further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

Relationship to boundaries

Further consideration and/or justification is required, where the proximity of balconies and windows in the development are located closer to boundaries than exhibited in the approved development. How the amenities and future development potential of lands adjacent to the site will be protected requires further examination and explanation in this regard. As previously noted, the proposed development is required to have regard to criteria under section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities 2018. This includes consideration of successful integration with the area. Further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

Quality of proposed residential accommodation

The prospective applicant should provide further justification and/or detail in relation to the quality of the proposed residential accommodation, particularly in relation to daylight and sunlight. A Daylight, Sunlight and Overshadowing Assessment is required to demonstrate how the proposed development responds to recommendations in the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (the BRE guidelines). Analysis of all units on each floor should be provided until it can be demonstrated that all units on a floor meet recommended targets, at which point it can be logically assumed units above will also pass. Please note that criteria in section 3.2 of the Urban Development and Building Heights

Guidelines for Planning Authorities 2018 includes regard to the quantitative performance approach to daylight provision as outlined in the BRE guidelines. In addition, further consideration of the outlook from units as they adjoin boundaries is also required. Further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

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. Additional details and/or revised proposals in relation to mix of non-residential uses to be included in the development and particularly the proposed medical suites.
2. Additional CGIs are required, as well as a Landscape and Visual Impact Assessment with photomontages, to include, consideration of visual impacts on the surrounding areas. This should include consideration of impact upon sensitive architectural areas/structures surrounding the site. Visibility should be illustrated in context with nearby Protected Structures located opposite the site on Glasnevin Hill and adjacent to the site in the Convent grounds. Visibility from the National Botanic Gardens should also be investigated. Photomontages should include winter views.
3. Topographical survey of the site and associated commentary on how this has impacted the design of the proposed development.

4. A plan showing separation distances between the development to existing adjacent properties should also be included, annotating key distances to boundaries, buildings and windows. A comparison to the approved development should also be provided.
5. All floor plans for the proposed development should be presented in context with surrounding boundaries.
6. The application submission should demonstrate that the quality of Part V Housing to be included as part of the development is indistinguishable from comparable private housing within the scheme.
7. Additional details and/or revised proposals in relation to landscape, having regard to comments from the Planning Authority in relation to communal open space and on street greening.
8. A plan of landscape proposals clearly delineating communal and private spaces should be provided, as well as a detailed breakdown of the total area of same. Consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children is also required.
9. Additional details and/or revised proposals in relation to site services/SUDs, having regard to the report of the Drainage Planning Section of the Planning Authority.
10. Additional details and/or revised proposals in relation to site access/entrances/servicing, having regard to the report of the Transportation Section of the Planning Authority.

11. Further justification in relation to the quantum of car parking proposed.
12. A plan identifying the location of cycle storage and how this conforms with planning policy requirements.
13. Traffic and Transport Impact Analysis, to be prepared in consultation with Dublin City Council. Consideration of transportation impacts during construction is also required, particularly in relation to parking provision for construction workers.
14. Additional details and/or revised proposals in relation Waste Management Storage and Collection Details.
15. A Housing Quality Assessment with regard to relevant national and local planning policy on residential development. Those windows considered to have a dual aspect should be clearly indicated, only windows with a true dual aspect will be considered as contributing to meeting the minimum quantum required. In relation to single aspect north-facing units, reference should be had to paragraph 3.18 of the 2018 Apartment Guidelines.
16. A report that specifically addresses the proposed materials and finishes of buildings, landscaped areas and any screening/boundary treatment. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinct character for the development.
17. 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.

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. Minister for Culture, Heritage and the Gaeltacht (Built Heritage and Nature Conservation)
2. Fáilte Ireland
3. The Heritage Council
4. An Taisce – The National Trust for Ireland
5. Irish Water
6. Transport Infrastructure Ireland
7. National Transport Authority

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

