



An
Bord
Pleanála

**Case Reference:
ABP-307953-20**

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: 129 no. Build to Rent apartments and associated site works. Redcourt, Seafield Road East, Clontarf, Dublin 3.

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. Open Space (communal and public):

- (a) Further consideration/clarification in the documentation in relation to the proposed covering over the communal courtyard area. This should include a rationale for the covering and clarify if the communal area is to be completely enclosed.

The documentation should also address, inter alia, the following in relation to this covered space: potential impacts arising from noise generated;

access to daylight/sunlight; temperature generated in this space; odour mitigation; implications, if any, for delivery of 'dual aspect' apartments; maintenance; uses proposed within the space etc. It may be of benefit at application stage if the applicant can indicate examples where such a proposed covering has been used in other residential developments.

- (b) Further consideration/clarification in the documentation in relation to the quantum and quality of public and communal open space provision and the creation of vibrant, amenable and high-quality communal open spaces within the development.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

2. Design and Layout

Further consideration and/or justification of the documents as they relate to the development strategy for the site in respect of the proposed height, scale and massing of the proposal, having regard to its locational context.

- (a) This should include a contextual layout plan which indicates the layout of adjoining developments, photomontages and cross sections at appropriate levels, including details of how the proposed development interfaces with contiguous uses/lands and adjoining roads (Seafield Road East, St. Gabriel's Road and Dollymount Park)
- (b) In addition to the consideration of local statutory policy and national policy and guidelines, particular regard should be had to demonstrating that the proposal satisfies the criteria set out inter alia in section 3.2 and SPPR3 of the Urban Development and Building Heights, Guidelines for Planning Authorities (December 2018). The applicant should satisfy themselves that the design strategy for the site, as outlined in red, provides the optimal outcome for the subject lands.
- (c) The interface with the Public Realm at Seafield Road East, St. Gabriel's Road and Dollymount Park, the interface with Redcourt Oaks to the east, as they relate to the design and layout of the proposed development and

the desire to ensure that the proposal provides a high quality, positive intervention at this location. Particular regard should also be had to creating suitable visual relief in the treatment of elevations and interface with adjacent lands. An architectural report, urban design statement and additional CGIs/visualisations should be submitted with the application, together with a report that specifically addresses proposed materials and finishes to the scheme.

The further consideration / justification should have regard to, inter alia, the guidance contained in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018, the Urban Development and Building Height Guidelines for Planning Authorities 2018; the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the accompanying Urban Design Manual; the Design Manual for Urban Roads and Streets 2013; and the Dublin City Development Plan 2016-2022.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

3. **Residential Amenities**

Further consideration and / or justification of the documents as they relate to residential amenity, having particular regard to the potential for overlooking, overshadowing and overbearing impacts on existing adjoining residential properties and proposed residential units within the scheme, and daylight and sunlight access to units and amenity areas within the development.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

4. **Ecology**

Further consideration/clarification of the documents as they relate to the raised by the Biodiversity, Parks and Landscape Services (report dated 7th September 2020) contained in the Planning Authority's Opinion received by An Bord Pleanála on 11th September 2020 & the addendum report from the Senior Executive Parks and Landscape Officer (report dated 11th September 2020) received by An Bord Pleanála on 11th September 2020.

The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating to 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:

- i. A housing quality assessment which provides the specific information regarding the proposed apartments required by the 2018 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements.
- ii. A detailed Sunlight, Daylight and Shadow Analysis.
- iii. Wind micro-climate study, including analysis of balconies, pedestrian areas and amenity areas.
- iv. A temperature analysis of the main communal amenity area and pedestrian routes, walkways/decking.
- v. A Landscape and Visual Impact Assessment, to include inter alia long views of the site from Bull Island.

- vi.** A report identifying the demand for school and crèche places likely to be generated by the proposal and the capacity of existing schools and crèches in the vicinity to cater for such demand.
- vii.** Response to issues raised in Addendum B of Planning Authority Report, received 11th September 2020 which includes the internal reports of the Transportation Planning Division, Drainage Division and Housing Department.
- viii.** A Draft Construction and Demolition Waste Management Plan.

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. Irish Water
2. Department of Culture, Heritage and the Gaeltacht
3. Heritage Council
4. An Taisce
5. DCC Childcare Committee
6. Irish Aviation Authority and Department of Defence.
7. Dublin Airport 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

December, 2020