



An
Bord
Pleanála

Case Reference:
ABP-310234-21

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: Demolition of existing structures onsite including No. 23 Prussia Street, construction of 166 no. Build to Rent apartments and associated site works. Lands at 23-28 Prussia Street, Dublin 7.

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. The design and delivery of a development that has due regard to the surrounding streetscape and historic context, and location within a Conservation Area, and to the setting of adjoining protected structures at no.'s 29, 66 and 67 Prussia St., with a high quality of design and finish. Particular regard should be had to the mass and scale of the proposed development and the prevailing height and grain of development in the surrounding area, and to the historic building lines and setbacks at this location

as documented in the submitted Heritage Impact Assessment. The design rationale should clearly address these matters. The application should be accompanied by detailed contextual elevation and section drawings which should illustrate the relationship with adjacent buildings, including buildings on the western side of Prussia Street.

2. The proposed development would constitute a significant intervention in the urban landscape at this location and the application should be accompanied by a detailed Rationale / Justification for the range of building heights proposed. Regard should be had in particular to the criteria set out in Section 3.2 of the Urban Development and Building Height, Guidelines for Planning Authorities' 2018 and Section 16.7 of the Dublin City Development Plan 2016-2022. Such rationale should address, in particular, the relationship and integration of the proposed development with development within Grangegorman Campus proposed to be undertaken in accordance with the permitted Grangegorman SDZ Planning Scheme.
3. Further detail in relation to the proposed connection through the site from Prussia Street to Grangegorman TU campus should be provided. In particular, the function and status of this route within the Grangegorman Planning scheme should be clearly described, including clarity with regard to the intended function of this route in the short and long-term as a construction or operational vehicular access to Grangegorman. Such vehicular use may have implications for the proposed development in terms of residential amenity and public safety and these matters should be clearly addressed in any application. The application should also provide clarity on responsibility for the satisfactory completion of the proposed works, including works to the historic boundary wall, and confirmation with regard to the operational management and maintenance arrangements for this route. Details of discussions with the relevant Grangegorman authorities and confirmation of their agreement to these arrangements should be provided.

4. The design and layout of development proposed for the site should demonstrate that appropriate regard was had to the context and setting of the adjoining protected structure at no. 29 Prussia Street. The submitted documentation does not provide sufficient detail in respect of this relationship and the potential impact on the character and setting of this structure. Regard is had in particular to the height of the proposed development and the proposed building line, the design and layout of the proposed basement car park entrance and relationship of the development with the shared site boundary wall. The design rationale for the proposed set-back from the gable wall of no. 29, and clarity with regard to its treatment in the development, should be clearly set-out.

Detailed plan, section and elevation drawings, along with other imagery to assist in understanding this relationship, should be provided in this regard.

5. The relationship of the proposed development with the boundary wall of Grangegorman campus, which is a protected structure, should be clearly described in the application. An accurate photographic and drawn survey of this wall should be provided, including details of conservation repairs to be carried out. The application should include detailed section drawings through the wall illustrating existing and proposed ground levels on either side, and detail of the use and treatment of the space between the proposed development and the wall. The rationale for any proposed interventions in the wall should be clearly set out and any necessary third-party consents to the proposed works should be provided as part of the planning application.

6. The application should clearly describe how the proposed operational service and delivery requirements of the proposed development will be met within the application site, having regard to the need to avoid on-street set-down or lay by areas. Where such requirements are to be met within the proposed basement car park, the application should clearly demonstrate that the design and layout can accommodate such activity. A Servicing and Operations Management Plan should also be provided in this regard.

The further consideration of these issues 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:

- a)** Further clarification and justification for the type and level of communal residential facilities to be provided on the site having regard to the Build to Rent nature of the proposed development, in accordance with the provisions of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020) and SPPR 7 contained therein.
- b)** Further elaboration of the proposed construction methodology in order to obviate potential impacts on adjoining structures, including in particular the protected structures to the north and east.
- c)** Additional analysis of the visual impact of the development on the surrounding area should be undertaken, to include additional photomontages and CGI's illustrating, in particular, the Prussia Street elevation of the proposed development and its relationship with adjoining development, as well as additional views from Manor Street north toward the proposed development.
- d)** Further details of the proposed materials and finishes to the scheme. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details, which have due regard to the context of the site. The details to be provided should also include the treatment of roof terraces, courtyards, landscaped areas and the public realm.
- e)** The design rationale for the proposed gateway feature on Prussia Street should also be set out, including a description of the basis for the choice of materials proposed and how this feature will link with the overall design approach within the campus, in order to fulfil its gateway function.

- f)** The application should be accompanied by the following:
- i. A Traffic Impact Assessment, a preliminary Construction Traffic Management Plan and a Mobility Management Plan.
 - ii. A quality audit in accordance with Annex 4 of DMURS. Such audit should also have regard to the potential for vehicular use of the proposed connection to Grangegorman campus, as referenced under item (3) above.
 - iii. A detailed rationale for the quantum of car parking proposed on the site, having regard to the provisions of the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities*, in respect of Build-to-Rent developments. A Car Park Management Strategy Plan should be provided in respect thereof.
- g)** Address the additional matters identified in the Transportation Planning Division of Dublin City Council dated 28th May 2021, including in particular the design of any basement car parking and the quantum and nature of cycle parking provision.
- h)** A Construction and Demolition Management Plan and an Operational Waste Management Plan should be provided having regard to the inner urban nature of the site. The Construction and Demolition Management Plan should consider the potential for the presence of hazardous materials within existing structures or contaminated soils within the site.
- i)** The application should be accompanied by a Wind Microclimate assessment, demonstrating the satisfactory safety and comfort of public and private spaces, including roof terraces, both within the site and on adjoining lands. Any required mitigation or other design measures arising from such assessment should be clearly detailed in the application.
- j)** The application should demonstrate that there will be no conflict arising from the proposed development with emerging design proposals for Bus Connects in respect of Prussia Street. The application should demonstrate how the proposed east-west connection through the site can be continued further west across Prussia Street and discussions with Dublin City Council should be undertaken in this regard.

- k)** The application should clearly identify the areas intended to be taken in charge by the Local Authority and those areas to be taken over by the Grangeegorman Development Authority, where appropriate.
- l)** The application should clearly demonstrate how the development will limit the potential for overlooking of adjoining residential properties. Additional cross section and contextual elevation drawings should be provided to demonstrate the relationship with adjoining properties to the south, along Prussia Street.
- m)** A comprehensive Daylight and Sunlight Assessment should be provided, having regard to the criteria set out in section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities, and the guidance provided in the BRE guide 'Site Layout Planning for Daylight and Sunlight; A Guide to Good Practice', 2011 and BS8208 Part 2:2008 Lighting for Buildings, Code of Practice for Daylighting.
- n)** Information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 (if an Environmental Impact Assessment report is not being submitted).

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. The Minister for Culture, Heritage and the Gaeltacht**
- 2. The Heritage Council**
- 3. An Taisce**
- 4. An Chomhairle Ealaíon**
- 5. Fáilte Ireland**
- 6. Irish Water**
- 7. Transport Infrastructure Ireland**
- 8. 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
July, 2021