



An
Bord
Pleanála

Case Reference:
ABP-310640-21

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: 1259 no. residential units (55 no. houses and 1204 no. apartments), creche and associated site works. Central Mental Hospital, Dundrum Road, Dundrum, Dublin 14.

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 in relation to the proposed dual application strategy for the subject landholding. Should the dual application strategy be pursued, as opposed to a single planning application for the entire holding, the applicant should seek to demonstrate that each application can be assessed and developed as a 'standalone' project in the event that, inter alia, one of the proposed developments is refused

permission. The applicant should also seek to demonstrate that both applications are coordinated and no conflict arises between the two proposals. In that regard, further consideration should be given to the precise details of each application, and, in particular the following should be considered in the context of a dual application strategy :

- how the main hospital building is to be accessed;
- what car parking, if any, it to be provided to serve the main hospital building with its new use;
- where any such car parking is to be provided and in which application is this to be addressed (noting, inter alia, limitations arising in SHD applications for 'other uses and implications if one application is granted permission and the other refused permission);
- bicycle parking, service yards, storage etc serving the main hospital building and its new use and where such uses are to be accommodated within the application site boundary;
- demolition works adjoining/adjacent the main hospital building (considering which application such works are to be sought under and implications for the other application if such works are refused), and
- all of the above, and other matters, should be considered in the context of the degree of overlap that may arise across the two separate applications (if pursued) and the need to deliver both a coordinated approach for the redevelopment of the landholding and also the need to submit 'standalone' applications.

If the dual strategy is to be pursued, there should be clear distinction between what is proposed in each application. Furthermore, should the dual application strategy be pursued, further consideration should be given as to whether a consecutive, as opposed to a concurrent, approach should be taken in relation to the making of the applications.

2. Design Strategy

Further consideration and/or justification of the documents as they relate to the design strategy for the site in respect of:

- (a) The interface with the Main Hospital Building, the Chapel, Infirmary and the proposed works and demolition work to the boundary wall, the public realm at Dundrum Road and the interface with Rosemount Green to the south, 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.
- (b) 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 (within Anneville, Larchfield, Friarsland, Mulvey Park, Rosemount Green and Dundrum Road)).
- (c) Response to the issues raised in the Conservation Division Report of Dun Laoghaire Rathdown County Council regarding phasing as contained in the Planning Authority's Opinion dated 23rd July 2021.
- (d) Response to the issues raised by the Planning Department of Dun Laoghaire Rathdown County Council, as contained in the Planning Authority's Opinion dated 23rd July 2021.
- (e) Justification/rationale regarding compliance with local planning policy. The further consideration and /or justification should address the objectives "to protect and / or provide for institutional use in open lands" that pertain to the site having regard to the provisions of the Dun Laoghaire Rathdown Development Plan 2016-2022.
- (f) Rationale/justification regarding the suitability of the proposed site to accommodate the proposed height and housing mix with regard to the provisions of the Dun Laoghaire Rathdown County Development Plan 2016-2022 and relevant national and regional planning policy including the 'Guidelines for Planning Authorities on Sustainable Residential Development in

Urban Areas' (including the associated 'Urban Design Manual'); The 'Design Standards for New Apartments – Guidelines for Planning Authorities' (2020) and the 'Urban Development and Building Heights – Guidelines for Planning Authorities' (2018).

- (g) 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.

The response should also include a report that specifically addresses the proposed materials and finishes and the requirement to provide high quality and sustainable finishes and details Particular attention is required in the context of the visibility of the site and to the long-term management and maintenance of the proposed development. A Building Life Cycle report shall also be submitted in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2020).

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 2020, 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 Dun Laoghaire Rathdown Development Plan 2016-2022.

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

3. Architectural Heritage

- (a) An Architectural Impact Assessment having regard to the impact on the proposed Protected Structures within the curtilage of the Central Mental Hospital, their character and setting. This should also include a detailed survey, assessment and justification for all structures which are proposed to be demolished or refurbished and converted to other uses.
- (b) A response to the issues raised in the Report of the Conservation Division of Dun Laoghaire Rathdown County Council, as contained in the Planning Authority's Opinion dated 23rd July 2021.

4. Traffic and Transportation

Further consideration and/or justification of the documents as they relate to the:

- (a) The use of the existing vehicular access to The Central Mental Hospital and the proposed new access off Dundrum Road.
- (b) The Car Parking Strategy for the proposed development, having particular regard to the quantum of residential parking proposed, how it is intended to be assigned and managed and measures proposed to address shared carparking with the Hospital Building if this is proposed under 'other use; as part of the SHD Application (the change of use which is noted will be the subject of a section 34 application to the Planning Authority), visitor parking and other uses proposed as part of the SHD application.
- (c) Pedestrian and cycle links to adjoining lands and connections to public transport routes and cycle/pedestrian infrastructure.
- (d) A response to the issues raised in the Report of the Transportation Division of Dun Laoghaire Rathdown County Council, as contained in the Planning Authority's Opinion dated 23rd July 2021.

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

5. 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. The response should include a detailed Sunlight, Daylight and Shadow Assessment of inter alia units proposed, communal open spaces, public open spaces and adjoining lands and properties.

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

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. A Housing Quality Assessment which provides the specific information regarding the proposed apartments required by the 2020 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.
2. A detailed Phasing Plan.
3. A microclimate analysis.
4. Response to issues raised in the PA Opinion received by An Bord Pleanála on the 23rd July 2021.
5. Address issues raised in the Irish Water Submission dated 29th July 2021.
6. A Site Specific Management Plan which includes details on management of the communal areas, public space, residential amenity and apartments.
7. An Archaeological Impact Assessment.
8. An Ecological Impact Assessment.
9. A Tree survey, Trees Constraints Plan, Tree Restoration Plan and Arboricultural Assessment.

10. A draft Construction Waste Management Plan, draft Construction and Environmental Management Plan and a draft Operational Waste Management Plan.
11. 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, as amended:

1. Irish Water
2. Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media.
3. Heritage Council.
4. An Taisce.
5. An Comhairle Ealaíon.
6. Fáilte Ireland.
7. National Transport Authority
8. Transport Infrastructure Ireland
9. Department of Education and Skills
2. Dún Laoghaire Rathdown County Childcare Committee

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, 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 2020 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Tom Rabbette

Assistant Director of Planning

October, 2021