



An  
Bord  
Pleanála

**Case Reference:  
ABP-312081-21**

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**Planning and Development (Housing) and Residential Tenancies Act 2016**

**Notice of Pre-Application Consultation Opinion**

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**Proposed Development: Demolition of existing buildings on site, construction of 194 no. apartments, creche and associated site works. Lands at "Harold's Bridge Court", Harold's Cross Road and Greenmount Lane, Harold's Cross, Dublin 6W.**

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. Further consideration of, and possible amendment to the documents submitted with regard to compliance with the zoning objectives relating to this site. In this regard, the documentation should include a detailed statement of consistency and planning rationale, clearly outlining how in the prospective applicant's opinion, the proposed development is in compliance with local planning policies

having specific regard to the Z6 zoning objective relating to the site – ‘to provide for the creation and protection of enterprise and facilitate opportunities for employment creation’.

Justification for the principle of the proposed development on lands zoned Z6 should have regard to the specific policies and principles of the Development Plan which state, inter alia, that

*“A range of other uses including residential, local support businesses, are open for consideration on lands zoned Z6 but are seen as subsidiary to their primary use as employment zones. The incorporation of other uses, such as residential, recreation, and retail uses, will be at an appropriate ratio where they are subsidiary to the main employment generating uses and shall not conflict with the primary land-use zoning objective, ...”*

*“Any redevelopment proposals should ensure that the employment element should be in excess of that on site prior to re-development in terms of the numbers employed and/or floor space.”*

This may require possible 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. A detailed Housing Quality Assessment, demonstrating compliance with relevant development standards. The application should clearly identify those dwelling units indicated as dual aspect units.
2. An updated and complete Townscape and Visual Impact Assessment, and updated CGS's, which should have regard to final proposed materials and finishes. Such assessment should take account of the reduced screening effects of any foliage / vegetation in winter months.

3. Proposed pedestrian and cycle connections to adjoining public roads should be clearly identified. The application should demonstrate that the building set-back provides for satisfactory levels of pedestrian provision along Greenfield Lane.
4. Details of areas intended to be taken in charge by the local authority.
5. The application should include a comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity / open spaces, as well as potential impacts on daylight and sunlight to adjoining properties. In preparing such assessment regard should be had to the provisions of section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and to the approach outlined in guides like the BRE 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.

The assessment should provide a comprehensive view of the performance of the entire development in respect of daylight provision. Where any alternative, compensatory design solutions in respect of daylight are proposed, these should be clearly identified and justified, and their effect appropriately described and / or quantified. The assessment should demonstrate that due regard was had to any screening to balconies or windows proposed to address potential overlooking of adjoining properties.

6. Further consideration with regard to the relationship of the proposed development with adjoining lands to the north and south. It should be demonstrated that the proposed development would not prejudice any future development / redevelopment of those lands, having particular regard to the proximity of Blocks B and C, and associated windows and balconies, to the northern and southern site boundaries.
7. The application should provide detailed section drawings and other visualisations clearly describing the relationship with adjoining residential properties and demonstrating how the development will address potential overlooking and overbearing impacts thereon, having regard to the transition in heights between the development its surroundings. Particular regard should be had to the relationship with properties on Limekiln Lane and Boyne Court.

8. With regard to Block B, further detail should be provided with regard to proposed screens to windows and balconies to address potential overlooking of properties on Parnell Road. Such detail should address the nature, function and effectiveness of the proposed screens as well as an assessment of their impact on the quality, value and daylighting of these residential amenity spaces.
9. A report addressing the matters raised in report of the Dublin City Council Transportation Department, dated 16/12/2021.
10. A servicing and operational management plan, to include the requirements of the proposed creche and retail unit on the site. The plan should be accompanied by swept path analysis to demonstrate that emergency and service vehicle requirements can be accommodated and that the prospective applicants are entitled to carry out any necessary works in this regard. Access and set-down arrangements from the proposed creche should be clearly identified.
11. An operational waste management plan demonstrating how refuse / bin collection can be facilitated without impacting on the operation of the adjoining road network, and in particular the adjoining bus corridor. The plan should identify bin storage and collection staging areas, which should not obstruct or interfere with pedestrian movement along the adjoining roads and footpaths.
12. A report addressing the matters raised in report of the Dublin City Council Engineering Department – Drainage Division, dated 14/12/2022. Application documentation should also clearly identify existing drains / sewers traversing the site and their relationship with the proposed development. Any associated maintenance requirements, including any required building set-back or landscaping arrangements should be identified.
13. A report that specifically addresses the proposed materials and finishes to the scheme, including specific detailing of external finishes, landscaping and paving, pathways, entrances and boundary treatments. Particular regard should be had to the requirement to provide high quality, durable and sustainable finishes which have regard to the context of the site.

14. A Building Lifecycle Report in accordance with section 6.13 of the Sustainable Urban Housing, Design Standards for New Apartments, Guidelines for Planning Authorities (2020) guidelines which should consider external materials on all elevations. The report shall also address the management and maintenance of public spaces and access routes to the development.
15. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 unless it is proposed to submit an EIAR at application stage.

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. Dublin City Childcare Committee
3. NTA
4. Minister of Housing, Local Government and Heritage
5. Heritage Council
6. An Taisce

**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.

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