



<b>Case Reference / Description</b>	101 apartments in three blocks (social housing units). High Park, Grace Park Road, Drumcondra, Dublin 9.		
<b>Case Type</b>	Section 5 Pre-Application Consultation Request		
<b>1<sup>st</sup>/2<sup>nd</sup>/3<sup>rd</sup> Meeting</b>	1 <sup>st</sup> Meeting		
<b>Date:</b>	5 <sup>th</sup> July, 2018	<b>Start Time</b>	11:00
<b>Location</b>	Offices of ABP	<b>End Time</b>	12:40
<b>Chairperson</b>	Tom Rabbette	<b>Executive Officer</b>	Lianna Slowey

**Representing An Bord Pleanála:**

Tom Rabbette, Assistant Director of Planning
Sarah Moran, Senior Planning Inspector
Lianna Slowey, Executive Officer

**Representing Prospective Applicant:**

Katharine Larkin, Planning Consultant, New Ground Ltd.
Christine Barros, Architect, Respond
Gwen Tierney, Landscape Architect, Landmark Designs
David Kelly, Conservation Consultant, David Kelly Partnership
Colin Brennan, Structural Engineer, David Kelly Partnership
Ken Hegarty, Traffic Consultant, Hegsons Design Consultancy

**Representing Planning Authority**

Siobhan O'Connor, Senior Executive Planner: Planning and Property Development Department
Elaine Power, Executive Engineer: Environment and Transportation Department
Stephanie Farrington, Executive Planner, Environment and Transportation Department

## **Introduction**

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant and Planning Authority (PA), introductions were made. The procedural matters relating to the meeting were as follows:

- The written record will be placed on the pre-application consultation file and will be made public, along with that file, should an application arise following the conclusion of this consultation process.
- ABP received a submission from the PA on 26<sup>th</sup> June, 2018 providing the records of consultations held pursuant to section 247 and its written opinion of considerations related to proper planning and sustainable development that may have a bearing on ABP's opinion.
- The consultation meeting will not involve a merits-based assessment of the proposed development.
- The meeting will focus on key site-specific issues at strategic overview level, and whether the documents submitted may require further consideration and/or amendment in order to constitute a reasonable basis for an application.
- Key considerations will be examined in the context of the statutory development plan for the area and section 28 Ministerial Guidelines, where relevant.
- A reminder that neither the holding of a consultation or the forming of an opinion shall prejudice ABP or the PA concerned in relation to any other of their respective functions under the Planning Acts or any other enactments and cannot be relied upon in the formal planning process or in legal proceedings.

The ABP representatives acknowledged the letter dated 31<sup>st</sup> May, 2018 formally requesting pre-application consultations with ABP. It was also noted that the Inspector dealing with the pre-application consultation request would be different to who would deal with the application when it was submitted. Digital recording of the meeting is prohibited.

## **Agenda**

1. Residential density in the context of national and local planning policy.
2. Residential amenity, proposed and existing.
3. Urban design, public realm, interaction with protected structure at the development site. Visual impacts to Grace Park Road. Tree retention and landscaping.
4. Traffic impacts. Vehicular, pedestrian and cycle connections. Car and cycle parking provision. Potential impacts on Dublin Port Tunnel.
5. Appropriate Assessment
6. Any other matters

## **1. Residential density in the context of national and local planning policy.**

### **ABP sought further elaboration/discussion on:**

- Proposed density 47 units per hectare, potential for higher density given the location of the site.

### **Prospective Applicant's response:**

- Portion of existing building on site is a protected structure.
- High priority to open up vistas and create new views from Grace Park Road.
- Dublin City Development Plan – 16m height threshold at this location.
- Height of proposed development is approx. 15m.
- Proposed reduction in density is in response to site constraints and not policy constraints.
- Aspiration to link the site to Swords Road would be dependent on integration into future development of adjoining site or as an objective in Dublin City Development Plan. Have left area clear to allow for such connection.
- Site constraints identified as presence of protected structure, height threshold, proximity of existing developments, existing trees to be retained and proposal for underground car parks.

### **Planning Authority's comments:**

- Satisfied with proposed density.
- Density of previously permitted application on site was reduced by ABP.
- Aware that characteristics on site may not allow density to go higher, i.e. protected structures.

### **ABP comments re. application stage:**

- Provide rationale if proposed density is to be maintained.
- Consider recent SHD decisions in the area, e.g. Carnlough Road, Cabra and be aware that ABP have refused SHD applications on the grounds of density being considered too low in context of inter alia, national policy.
- Pedestrian link to Swords Road would be desirable in terms of DMURS.
- Look at wayfinding/accessibility within site if a future connection becomes available.
- Provide greater detail re. occupancy of existing buildings on site and give indication of population/demographic.

## **2. Residential amenity, proposed and existing.**

### **ABP sought further elaboration/discussion on:**

- Block behind convent already granted
- Impacts on hospital to the rear
- Detailed comments of Dublin City Council regarding apartment design were noted.

**Prospective Applicant's response:**

- Previous permission – 2 floors were removed from block adjacent to hospital.
- Proposed development is the same height as what was previously permitted on site.
- Carried out daylight/sunlight analysis – 98% compliant with BRE standards.

**Planning Authority's comments:**

- As per opinion report dated 26<sup>th</sup> June 2018, more detailed consideration required re. apartment design.

**3. Urban design, public realm, interaction with protected structure at the development site. Visual impacts to Grace Park Road. Tree retention and landscaping.**

**ABP sought further elaboration/discussion on:**

- Interaction of basement construction with tree retention.
- Height in context of protected structure

**Prospective Applicant's response:**

- Arboricultural assessment has been carried out and have conducted testing re. basement construction and retention of trees.
- Parkland trees proposed throughout the site, 19 new trees to be planted.
- Constraints have dictated landscape layout.
- Will overlay services on landscape plan at application stage.
- Linear route along Grace Park Road for pedestrian access.
- Play areas to cater for different age groups.
- Memorial garden proposed adjacent to plaza, have consulted with residents of former institution on site.
- Protected structures – church has recently been restored using best conservation standards. House, partly a protected structure, less significant than the chapel but has potential to be displayed better, proposals to improve immediate area in front of the house.
- The proposed development is not significantly higher than the protected structures and will not dominate the existing buildings on site.
- If additional height is added to the scheme it could be stepped towards the chapel.

**Planning Authority's comments:**

- No comments to add, refer to opinion report.

**ABP comments re. application stage:**

- Ensure no conflict between landscape plan and proposed SUDs measures.
- Address interaction of basement construction with tree retention at application stage.

#### **4. Traffic impacts. Vehicular, pedestrian and cycle connections. Car and cycle parking provision. Potential impacts on Dublin Port Tunnel.**

##### **ABP sought further elaboration/discussion on:**

- Apartment guidelines – policy to minimise parking provision in central / accessible urban locations. Prospective applicant to consider the proposed provision in light of the performance related approach of the apartment guidelines.
- DCC opinion report – require further details of the entrance to Grace Park Road.
- Transport Infrastructure Ireland (TII) comments re. potential impacts on Dublin Port Tunnel.

##### **Prospective Applicant's response:**

- Acknowledge DCC's opinion report.
- Car parking provision meets development plan standards.
- Experience from previous scheme with more units and fewer car parking spaces, associated issues re. overspill parking.
- If no demand for car parking spaces, there is scope for this space to be converted to cycle parking.
- Proposed basement carpark at western corner of site will impact Dublin Port Tunnel zone of influence but calculations fall well within parameter.

##### **Planning Authority's comments:**

- Maximum car parking standards 1.5 spaces per residential unit.
- Existing use on site will also generate traffic.
- Requirement for car storage, strike balance between car storage and traffic management, consider car sharing schemes/car clubs.
- Details are not clear on the scale of drawings submitted with pre-application consultation request.
- Provide details of basement car parking, fully accessible facilities are required.
- Further discussion/feedback can be facilitated between TII and the prospective applicant.

##### **ABP comments re. application stage:**

- Car parking provision should balance with demand created by existing uses on the site.
- Provide justification/rationale re. car parking proposals, consider implications of providing 2 no. basement car parks, i.e. costs, impacts on trees, etc.
- Consider a parking management plan.
- Mobility management plan to be submitted with application.
- Important to consider amenity of trees along boundary with hospital and construction of basement car park at this location.
- Transport Infrastructure Ireland (TII) comments re. potential impacts on Dublin Port Tunnel have been circulated and should be addressed prior to lodging the application.
- Encourage further discussions between prospective applicant and Planning Authority.

## **5. Appropriate Assessment**

### **ABP comments re. application stage:**

- The AA screening report submitted with pre-application consultation request considers sites within 10 km of the development. The AA guidelines recommend a radius of 15 km. 10 km may be reasonable at this urban location, however justification should be provided in the screening submitted.

## **6. Any Other Matters**

### **ABP sought further elaboration/discussion on:**

- Childcare – any liaison with Dublin Childcare Committee?
- Revised archaeological assessment to take account of basement car parks.

### **Prospective Applicant's response:**

- Have consulted with childcare committee, they do not have a study of the childcare facilities in the area.
- 2018 apartment guidelines - proposed development is subthreshold re. provision of childcare facility due to the proportion of 1 bed units proposed.
- Reports were formally prepared re. former uses on site, confident no burial areas within this part of site.
- A former lake on site has been back filled, no issues re. drainage.
- Consultations with Irish Water and DCC, wayleave along Grace Park Road.

### **Planning Authority's response:**

- Advise the prospective applicant to submit details of the childcare assessment to the Dublin Childcare Committee.
- Justify why there is deviation from the provision of childcare facility (1 per 75 units).

### **ABP comments re. application stage:**

- Archaeological assessment needs to be up to date and take into consideration construction of basements and potential impacts on trees.
- Strongly advise as much agreement as possible is in place in relation to technical matters (e.g. drainage/roads, etc.) between the prospective applicant and the Planning Authority before any application is lodged. Outline position and reasoning if no agreement is reached.

### **ABP invited parties to raise any outstanding matters.**

### **Prospective Applicant's comments:**

- Queried if exempt from fees as an approved housing body.
- Housing needs assessment has been carried out, 2 meetings with DCC.
- Tenants will be allocated from DCC's housing list; Respond will manage site on an on-going basis.
- 5 north facing units within block A will overlook open space and an internal road.
- Acknowledge the co-operation of DCC throughout the pre-planning process.

**Planning Authority's comments:**

- Generally, do not permit single aspect north facing units unless they overlook a significant public amenity.
- Concern re. proposed gated entrance from Grace Park Road.

**Prospective Applicant's response:**

- Pedestrian/cycle entrances will be open during park times with resident access only in the evening time.

**ABP comments re. application stage:**

- SHD administrative team to revert to prospective applicant re. whether approved housing bodies are exempt from fees.
- Provide rationale re. proposed north facing units within block A.
- Show the relationship between proposed development and Martanna House.

**Conclusion**

**The representatives of ABP emphasised the following:**

- There should be no delay in making the planning application once the public notice has been published.
- Sample notices, application form and procedures are available on the ABP website.
- Irish Water would like prospective applicants to contact Irish Water at [cdsdesignqa@water.ie](mailto:cdsdesignqa@water.ie) **between the Pre-Application Consultation and Application stages**, to confirm details of their proposed development and their proposed design.
- The email address to which applicants should send their **applications** to Irish Water as a prescribed body is [spatialplanning@water.ie](mailto:spatialplanning@water.ie)

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Tom Rabbette  
Assistant Director of Planning  
July, 2018