



Case Reference / Description	Demolition of 4 no. dwellings, construction of 259 no. residential units (9 no. houses, 250 no. apartments), childcare facility and associated site works. Lands consisting of Kylemore House, Rockwinds, Smallacre and Woodlawn, Church Road; and No. 43 Watson Road and No. 66 Watson Drive, Killiney, Co. Dublin.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	14 th October 2020	Start Time	14:05 p.m.
Location	Via Microsoft Teams	End Time	15:15 p.m.
Chairperson	Tom Rabbette	Executive Officer	Ciaran Hand

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Fiona Fair, Senior Planning Inspector
Ciaran Hand, Executive Officer

Representing Prospective Applicant:

Shaun Thorpe, Applicant Representative
Pat Crean, Applicant
Helena Gavin, Planner
Robert McCauley, Architect
David O'Brien, Architect
Michael Hughes Engineer

Representing Planning Authority

Cáit Ryan, Senior Executive Planner, Planning Department
Alex Fahey, Executive Planner, Planning Department
Bernard Egan, Senior Executive Engineer, Drainage Planning
Thiago Bodini, Executive Engineer, Transportation Planning

Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, the Local Authority (LA) and 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 P.A on 24th June 2020 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 decision,
- 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 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 LA 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 21st May 2020 formally requesting pre-application consultations with ABP. Prospective applicant advised of the need to comply with definition of SHD as set out in the Act of 2016, in relation to thresholds of development. 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. Recording of the meeting is prohibited.

Agenda

- 1. Development Strategy having regard to, inter alia, the local objective for the lands, set out in the Dun Laoghaire Rathdown County Council Development Plan 2016 – 2022.**
- 2. Residential Amenity in the context of the ‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities’, March 2018. (Internal and external) open space provision, aspect of units and access to daylight and sunlight.**
- 3. Urban design considerations such as building height and the bulk, scale, density and mass of blocks; architectural treatment; pedestrian connections and interface with existing development.**
- 4. Visual Impact Analysis.**
- 5. Site Services.**

6. **Response to the Issues Raised in the Planning Authority Opinion, submitted to An Bord Pleanála on the 24th June 2020.**
7. **Any Other Matters.**

1. **Development Strategy having regard to, inter alia, the local objective for the lands, set out in the Dun Laoghaire Rathdown County Council Development Plan 2016 – 2022.**

ABP sought further elaboration/discussion on:

- Development Plan and zoning.
- The site is zoned A 'Residential': 'to protect and / or improve residential amenity'.
- Institutional objective
- There is a Local Objectives on the southern portion of the lands: 'To protect and / or improve institutional use in open lands.' Query whether the local objective is allied with lands surrounding Kylemore House, only, or the overall lands.
- Open space and compliance with development plan standard of 25 % requirement of POS for lands with Institutional Objective attached.
- Future proposals for taking in charge of open space areas
- Justification for the scale and density proposed.

Planning Authority's comments:

- Proposed development generally accords with the County Development Plan
- Clarity is needed regarding the provision of open space
- Explain the reference "other gardens"
- Outline the open space locations
- Quantum is a concern
- Explain what parts of the site the quantum of open space relates to
- Institutional objective is for the Kylemore part of the site
- There is a requirement for 25 % in the County Development Plan for public open space

Prospective Applicant's response:

- The subject site is zoned for residential use
- There is 10,000 sq. m of open space proposed
- Location and quantum of open space will be clarified and detailed fully in any future application
- 30% of the site area is open space including the communal space
- Public, private and communal space will be detailed
- The institutional objective relates to the southern part of the site
- This will be taken into account
- The open space on the Kylemore part of the site can be clarified
- No intention to have any part of the site taken in charge. The development will be managed by a management company.
- Density is 107 units per hectare

Further ABP comments:

- Outline if there is a potential for material contravention

- Submit a rationale regarding the proposed density

2. Residential Amenity in the context of the ‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities’, March 2018. (Internal and external) open space provision, aspect of units and access to daylight and sunlight.

ABP sought further elaboration/discussion on:

- % of dual aspect units is queried. Onus is on the application to demonstrate compliance with Guidelines.
- Demonstrate where minimum floor area exceeded by 10%
- Daylight and sunlight analysis afforded to new residential units, communal and open space areas and existing residential development.
- Depth of rear gardens to houses facing onto the access road
- Depth of rear gardens to terraced units to the north of the site
- Block C and the orientation of balconies. Possibility of overlooking or perceived overlooking.
- The proposal is essentially 2.5 times greater than the number of units / density within the same footprint of the permitted scheme. Justification of how this is being achieved in light of the Guidelines.

Planning Authority’s response:

- Outline the daylight access for apartments
- Clarify the floor to ceiling heights
- Depth of the rear gardens is insufficient and a concern
- The residential amenities for future occupiers are a concern

Prospective Applicant’s response:

- Proposed arrangement for units is a north/south axis
- This will allow units to benefit from light
- The BRE standard for daylight and sunlight, for both private amenity spaces for houses and apartments and open space areas is met and exceeded.
- Terraces, private open space and communal open space is being provided and access to daylight and sunlight achieves BRE standards.
- Dual aspect is 51% in each block
- BRE standards are being exceeded
- Floor to ceiling heights will be clarified
- Rear gardens are 61 sq. m
- There is a 5.1-meter distance between the proposed units and the party boundary.
- Proposed houses at this location are south facing and have a controlled aspect
- They have light on both sides and cannot overlook
- Conscious of the balconies at block C 2

Further ABP comments:

- Consider the development potential of the adjoining lands
- Cross sections would be beneficial
- Set out the dual aspect using colour coding
- Ensure that the floor areas and private open space complies with the guidelines

- Detail/address any potential impacts arising from overlooking and overshadowing
- Interface and transition between proposed apartments and existing adjacent houses needs to be considered. Existing amenities and development potential of adjacent residential properties needs to be fully considered.

3. Urban design considerations such as building height and the bulk, scale, density and mass of blocks; architectural treatment; pedestrian connections and interface with existing development.

ABP sought further elaboration/discussion on:

- Height, bulk and design
- Scale and massing
- Pedestrians connections and wayfinding through the site, connectivity with the wider area.
- Views from Church Road justified.
- Relationship of buildings fronting Church Road requires further analysis, intended character and sense of place.

Planning Authority's response:

- Heights are a concern
- It is important that the design ensures a sense of place
- Explain what the overall intention of the design rationale
- Show relationship with Church Road, intended character and sense of place, connectivity, visual impact.
- Railings should be show on the drawings
- There is scope for more planting and own door access for apartments onto Church Road
- The block A2 close to Matthias Wood could be overbearing. Clarity required with respect to proximity to boundary, existing residential development and potential overlooking impact.

Prospective Applicant's response:

- There are stepped terraces
- Creating two strong public spaces
- There is stepping down as development approaches existing adjacent development
- Materials are broken to avoid uniformity
- Overall impact is moderate to no impact
- The building line has been brought forward along Church Road
- Planting is located between the railings and buildings
- Own door access can be examined, open to including additional own door access units facing Church Road and the plaza area.
- Blocks are designed to be stepped down and back at edges and roof level. Four storeys are stepping back to five storeys, max 6 storeys proposed.
- The layout and design of the blocks ensures overlooking has been designed out. Oblique views, screening and separation distances are incorporated into the design.
- There is no potential overbearing impact arising, the separation distance of block A2 to adjoining boundary is 33-35 metres
- Cross sections indicating the relationship of the proposed blocks with existing residential development will be submitted with the application.

Further ABP comments:

- Justify the transition
- Ensure a sense of place
- Cross sections showing the interface between proposed development and existing neighbouring development should be submitted
- Justify the height
- Outline any potential overlooking issues and mitigations proposed, proximity to boundaries should be clearly indicated on drawings submitted

4. Visual Impact Analysis.

ABP sought further elaboration/discussion on:

- Visual impact
- Separation distances between the blocks
- Views from Church Road and the wider area needs justification.

Planning Authority's response:

- Any potential visual impact should be detailed from the wider area

Prospective Applicant's response:

- Full and detailed visual impact analysis will be carried out and submitted

Further ABP comments:

- Have regard to any visual impact

5. Site Services

ABP sought further elaboration/discussion on:

- Drainage report by the planning authority, any issues raised to be fully addressed.
- No option for further information in SHD, all site services issues need to be resolved in advance of any application being submitted.

Planning Authority's response:

- Any outstanding issues can be addressed
- Landscaping and lighting proposals must take account of each other and suitably align.
- Public lighting needs to be further examined.

Prospective Applicant's response:

- No issues with foul drainage
- Progressed to a statement of design acceptance

Further ABP comments:

- Address any outstanding issues
- There is no further information sought at application stage

6. Response to the Issues Raised in the Planning Authority Opinion, submitted to An Bord Pleanála on the 24th June 2020.

ABP sought further elaboration/discussion on:

- Any issues raised in the planning authority report

Planning Authority's response:

- Clarify lights on the back footpath
- Have regard to the looped circuits
- Submit a quality audit for transport
- Examine basement car parking and ensure pedestrian priority and desire lines
- Ensure accessibility
- There should be one car parking space per unit
- The quantum of cycle parking is adequate
- Need to include provision for different types of bicycles, child seats, easily accessible and useable.

Prospective Applicant's response:

- Car parking is not being increased from the previous scheme
- A car parking management document will be submitted
- Spaces will not be sold with the units
- Management company will control the car spaces

Further ABP comments:

- Detail overshadowing
- Submit a building lifecycle report
- Compare/contrast potential traffic impacts between the current proposal and the previously granted scheme
- Assess traffic impact. Justification for the proposal for vehicular access through Watson Road, a quiet residential area.
- Explain the management of car spaces

7. Any Other Matters

Planning Authority's comments:

- No further comments

Prospective Applicant's response:

- No further comments

Further ABP comments:

- No further comments

Conclusions

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 **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

Tom Rabbette
Assistant Director of Planning
October, 2020