



Case Reference / Description	Demolition of existing buildings, construction of 105 no. apartments and associated site works. No. 54 Glasnevin Hill and "Ardmore" with lands adjacent thereto, No. 38 Glasnevin Hill, No. 52 Glasnevin Hill, lands to the rear of Nos. 48, 50 and 52 Glasnevin Hill and Nos. 40 and 42 Glasnevin Village, Dublin 9.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	10 th September 2020	Start Time	9.30 am
Location	Via Microsoft Teams	End Time	10.55 am
Chairperson	Tom Rabbette	Senior Executive Officer	Cora Cunningham

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Rachel Gleave O'Connor, Planning Inspector
Cora Cunningham, Senior Executive Officer

Representing Prospective Applicant:

Bryan Lawlor, applicant
Noel Smyth, applicant
Tom Phillips, TPA
Ciara Slattery, TPA
Barry Macken, KMD
Seamus O'Rourke, Muir Consulting Engineers
Bryan McCormack, Parkbourne Consulting Engineers
Bryan Deegan, Altemar

Representing Planning Authority

Siobhan O'Connor, Senior Executive Planner
Roisin Ni Dhubhda, Transport
Kieran O'Neill, Parks

Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, Planning Authority (PA) via Microsoft Teams having regard to the Covid-19 virus.

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 8th July 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 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 11th June 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. **Land uses proposed (function of medical suites and access to residential amenities),**
2. **Height, design and density (including relationship to the Convent site to the west and relationship to the street),**
3. **Residential amenity within the proposed development and relationship to rear garden associated with 44 Glasnevin Hill,**
4. **Communal amenity and landscaping,**
5. **Car parking,**
6. **Site access and servicing,**

7. **Cycle storage,**
8. **Drainage,**
9. **Any Other Matters.**

1. Land uses proposed (function of medical suites and access to residential amenities)

ABP Comments:

- > Further information on the intended operator of medical suites required
- > Address in application if proposed gym will be publicly accessible or only accessible to the residents of the proposed development
- > Provide drawings in application to justify what is proposed

Prospective Applicant's Comments:

- > Proposed medical suites are having regard to the proximity to local hospitals and flexible with zoning
- > Prospective applicant to reconsider uses, propose to consider providing 1 medical suite (GP) and combine the other 2 units to provide a local convenience store
- > Gym for residents use only, other units for wider community use

Planning Authority's Comments:

- > PA have concern with number of medical suites proposed, application should provide justification and detail for number of units proposed including the link to the hospital. Diversification of non-residential uses on the site is encouraged

2. Height, design and density (including relationship to the Convent site to the west and relationship to the street)

ABP Comments:

- > It is not clear from the submitted documents if the proposed development represents an improvement, or is consistent in terms of impact, with the approved scheme
- > Note a Material Contravention Statement. Detailed consideration will be required in relation to the performance criteria under the building height guidelines
- > Additional photomontages required and further detail of elevational treatments
- > Address relationship of proposed development to all boundaries. In particular, have regard to the convent site and preserving the future development potential of that site
- > Provide better visualisations of the street condition
- > Have regard to boundary to the Washer Woman and provide more clarity regarding the relationship of the proposed development with the boundary to Washer Woman
- > Address street conditions having regard to vehicular/pedestrian access etc.
- > Further detail required of how the development will interact with the street as this is not clear in submitted visuals
- > Clear comparison required between approved and proposed scheme including relationship to all boundaries etc.
- > All floor plans should be presented in context with the boundaries to the site and the location of adjoining properties

- > Application should show that the proposed development is not creating an inactive frontage
- > Material Contravention Statement should show how the development responds to criteria under section 3.2 of the building height guidelines

Prospective Applicant's Comments:

- > Visual aspect – additional floor proposed to each block
- > Prospective applicant acknowledge comments in PA Opinion and can address by setting back boundary
- > Floor plans have changed slightly from what was previously permitted
- > Similar setback in permitted scheme
- > Some balconies on western side of proposed development closer to boundary
- > Balconies more prominent than those in previous scheme
- > Elevational treatments have changed, block has been moved eastwards to that previously approved
- > Additional floor at penthouse in proposed development
- > Materials proposed remain unchanged
- > Setback still maintained at street level
- > Proximity of balcony to Washer Woman at ground level, should be noted that there is no balconies proposed at upper levels
- > Can provide photomontages, sections looking directly at proposed development from directly across the street
- > Application documentations will address uses at street level including finishes

Planning Authority's Comments:

- > Limited information submitted
- > PA not satisfied with level of detail provided in documentation
- > Greater detail required in sections and elevational drawings

3. Residential amenity within the proposed development and relationship to rear garden associated with 44 Glasnevin Hill

ABP Comments:

- > Have regard to the amenities within the proposed development and its relationship with external amenities
- > Daylight/sunlight analysis shows number of units fail BRE standards, and only a limited selection of units have been included in the analysis
- > Address if unit 32 tested, appears to be a new unit that is not included in testing analysis
- > All units on each floor should be assessed for Sunlight/Daylight analysis until it can be demonstrated that all units on a floor pass, then it can be assumed units above will also pass
- > Have regard to any future development on adjoining site and the proposed developments proximity to the boundary
- > Rear bedroom of unit 7 has restricted outlook
- > Daylight/Sunlight not assessed in unit 7 (Part V unit)
- > Demonstrate sunlight analysis of proposed units

- > PA have proposed potential amendments by condition but ABP may not agree that these amendments are sufficient to address matters

Prospective Applicant's Comments:

- > Have reassessed previous analysis of units that failed and all units now meet criteria
- > Can carry out analysis on every unit but pre-app analysis only carried out on worst case scenario units
- > Looked at balcony treatments and improved these in order to meet standards
- > Unit 32 not assessed, can assess and include in application documentation
- > Rooms beside balconies passing standards but balconies causing daylight/sunlight issues
- > Unit 32 south facing with dual aspect
- > Staircase at lower level to balcony
- > More details and sections can be included in application

Planning Authority's Comments:

- > PA agrees with ABP have regard to the information that is required
- > Submit north/south cross sections of block in application

4. Communal amenity and landscaping

ABP Comments:

- > PA Opinions looking for clarification of communal open space proposed
- > Submit drawing to demonstrate communal open space
- > Prospective applicant and PA should agree a financial contribution (if applicable) and include this in the application documentation as there is no further information request process in SHD applications
- > Have regard to section 3.2 of apartment guidelines in relation to quality of communal open space
- > Level of detail and quality of communal open space lacking in documentation

Prospective Applicant's Comments:

- > Communal open space provision is as per apartment standards
- > Garden space to western boundary to provide private open space but excluded from calculations
- > Communal open space calculations do not include fire tender access, but this area is part of the space
- > Communal and private open space exceeds requirements in both cases
- > Previous permission did not include public open space, applicant had agreed to pay financial contribution and proposes to do the same in this instance
- > Financial contribution will be determined having regard to development contribution scheme

Planning Authority's Comments:

- > PA Opinion sets out concerns, address lack of clarity of communal and private open space, is public open space being proposed

- > Drawings should be included in application to show communal and private open space
- > Clarify if 10% public open space is being provided
- > PA is not satisfied with the quality of communal open space
- > PA satisfied with financial contribution being paid in lieu of public open space this instance
- > ABP should be aware that PA included financial condition in their grant of permission on the permitted development, however ABP did not include the condition on appeal
- > If applicant decides not to pay financial contribution PA will look for 10% public open space
- > Ensure sufficient privacy planting included
- > Have regard to street scape of Glasnevin Hill, PA have concern due to proposed developments proximity to the Botanic Gardens and suggest greening of the edge of the development onto the street
- > Consider introducing further greening into proposed development
- > Look at column or blank facades which could be greened

5. Car parking

ABP Comments:

- > Quantity of car parking in proposed development reduced from approved scheme but number of units increased
- > Lack of justification submitted in relation to proposals
- > Accept prospective applicant may be adhering to national policy however documents need to set out details more clearly

Prospective Applicant's Comments:

- > Prospective applicant will carry out more work in relation to justifying parking
- > Outline travel plan needs to be updated
- > Have engaged with car club and reached agreement to provide car sharing in proposed development, will include details in application
- > BusConnects proposed close to proposed development which includes 2 spine routes
- > Had regard to national policy in relation to quantum of car parking and adhering to that
- > Will submit car parking allocation strategy

Planning Authority's Comments:

- > PA Opinion sets out PA concerns
- > Strong justification required having regard to Area 3 zoning
- > Submit Mobility Management Plan
- > Justify car sharing
- > Avoid overspill onto neighbouring streets
- > Demonstrate distances to bus stops and frequency of services
- > Car share appears to be exclusively for residents of proposed development but usually available to the wider community
- > Written commitment required from car share company
- > PA require breakdown of car parking spaces proposed

6. Site access and servicing

ABP Comments:

- > Have regard to site access, servicing and proposed loading bay

Planning Authority's Comments:

- > Setdown area needs to be agreed with traffic advisory committee in PA
- > Clarification required regarding number of vehicles that will use setdown area, number of vehicles that will service the site each day
- > Address the impact the proposed development will have on the public road in relation to traffic congestion

7. Cycle storage

ABP Comments:

- > Proposals should demonstrate adequate cycle provision
- > Proposed development reliant on bus and bicycle, not close to Luas or trains

Prospective Applicant's Comments:

- > Don't know of any scheme where the quantum of cycle parking suggested by the PA is used
- > Scope to increase number of spaces in basement and can provide Sheffield stands at podium level and at street level at retail units
- > Visitor spaces can also be increased
- > On grade access
- > Scope to increase number of spaces in Block 2
- > Ramp linkage and access not exposed
- > Can provide indent to front of retail units to provide Sheffield stands
- > Can see if other bicycles are available in the area – Bleeper Bikes

Planning Authority's Comments:

- > Cycle standards more reflective of number of bed spaces rather than number of units
- > Access, security or 2-tier not demonstrated on site plans
- > PA does not want number of spaces matching number of bed spaces, but number should be increased from 1 space per unit
- > Car and bicycle access common to both, have regard to safety and gradients

8. Drainage

ABP Comments:

- > Technical drainage issues raised in PA Opinion
- > Have regard to flood risk guidelines which feature in the criteria under section 3.2 of the building height guidelines

Prospective Applicant's Comments:

- > Propose to carry out site specific flood risk assessment

- > Proposed development will be similar to permitted scheme
- > Prospective applicant can discuss issues further with PA prior to lodging applicant and believe issues can be addressed

Planning Authority's Comments:

- > Issues raised in PA Opinion should be addressed by prospective applicant

9. Any other matters

ABP Comments:

- > Significant increase from permitted scheme, significant outstanding matters relating to potential over-scaled development, overdevelopment of the site, potential adverse impact on the future development potential of adjacent sites and the quality of proposed residential accommodation. Need to be addressed/justified in any application arising.

Planning Authority's Comments:

- > Communal open space drawing should be submitted identifying ventilation points as this can reduce the usable open space

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 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