



An
Bord
Pleanála

Record of Meeting ABP-307977-20

Case Reference / Description	714 no. residential units (583 no. Build to Rent apartment, 131 no. Build to Sell apartments) and associated site works. Milltown Park, Sanford Road, Dublin 6.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	23 rd October, 2020	Start Time	09:30 am
Location	Via Microsoft Teams	End Time	11:15 am
Chairperson	Tom Rabbette	Executive Officer	Hannah Cullen

Representing An Bord Pleanála:

Conor McGrath, Senior Planning Inspector
Tom Rabbette, Assistant Director of Planning
Hannah Cullen, Executive Officer

Representing Prospective Applicant:

Tom Sweetman, O'Mahony Pike Architects
Derek Murphy, O'Mahony Pike Architects
Rebecca Adam, O'Mahony Pike Architects
Richard Butler, Model Works
Mike Martyn, Cameo and Partners
Steve Cassidy, Ardstone Homes
Mark Forrest, Ardstone Homes
Robert Kelly, DBFL Consulting Engineers
Dan Reilly, DBFL Consulting Engineers
Patricia Thornton, Thornton O'Connor Town Planning
Elaine Hudson, Thornton O'Connor Town Planning
James O'Sullivan, Lafferty Architects

Representing Planning Authority

Kiaran Sweeney, Area Planner
David Conway, Executive Planner (Roads)
Kieran O'Neill, Senior Executive Landscape Architect
Mary Conway, Deputy Dublin Planning Officer

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 15th September, 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 19th August, 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. Compliance with Z15 Zoning Objective**
- 2. Development Strategy – height and layout**
- 3. Tree loss / retention**
- 4. Access and parking, including access for pedestrians and cyclists**
- 5. Residential amenity – housing mix, daylighting, aspect, childcare**
- 6. Any other matters**

1. Compliance with Z15 Zoning Objective

ABP sought further elaboration/discussion on:

- The extent of public access to the lands - existing and proposed.
- Specific requirement for this land use zone for public open space to be at 25%, 31% seems to be the figure currently.
- Eastern woodland area border concern.
- The function and treatment of the proposed plaza area off Sandford Road as public open space.

PA Comments:

- There has been no discussion with the Department of Education regarding these lands.
- In principal no objection to the provision of the proposed open space however concern with the quality of the spaces.
- Plaza area very busy location, would not deem it suitable to be included in the calculation of open space.

Prospective Applicant's comments:

- Eastern woodland is of low amenity value currently, massive gain by opening up this space to the public as part of the development.
- Discussion regarding the Plaza area with the Roads Department, there will be limited traffic coming off the Sandford Road entrance, it will have a role to play in the provision for open space.
- Plaza is mainly pedestrian and cycle space, predominantly a shared surface with limited access. About 12 spaces for cars, this is a very limited drop off area.
- Block A1 projects north to address the street and create a presence at the junction, create a visual marker. Not a barrier to the open space as the space flows through the block.
- There is scope to increase the open space percentage at edges of the site.
- Can relook at the visuals and designs of the site submitted so there is less of a dissection between the areas of open space.
- Difference of opinion between the planning authority and the applicant, applicant would like to open up Milltown Road, the planning authority did not. There is a balance between retention of the historic wall and opening up views.

Further ABP comments:

- Board will need to be satisfied that the application is complying with the land zoning.
- It would be useful to provide a document at application stage outlining the overall institutional landholding, where the sites sit together along with future uses.
- Relook at increasing the visibility into and through the site to help create a sense of open space by the public.

Further Planning Authority comments:

- Ideally, PA would like if the wall at Milltown Road is retained as much as possible, however there is some scope to open up certain areas along this wall facing the road.

2. Development Strategy – height and layout

ABP sought further elaboration/discussion on:

- The design rationale and evolution of design across the site, particularly for block A1.
- The contravention of the 16m limit specified in the development plan.

PA Comments:

- Heights proposed generally considered acceptable.
- Impact on adjoining residents, scope to lower units on the perimeter as to not affect surrounding area.
- There is no justification for a marker building (A1) at this location.

Prospective Applicant's comments:

- Comments made by the planning authority are noted.
- Detail of the alternative design approaches considered will be provided, and also addressed in EIAR at application stage.
- The proposed heights are not excessive and there is a rationale for the approach for this site. There is modulation of scale and height throughout the buildings.
- Shadow cast analysis and microclimate report demonstrates no notable impacts except for visual impacts.

Further Planning Authority comments:

- Evidence to be provided at application stage to show the units will not impact the surrounding residences.
- Main concern is the significant visual impact of the 13-storey element (marker building), no justification provided for this within the wider city.
- The structure is substantial, rather than slender

Further Prospective Applicant's comments:

- Justification for marker building is due to the large nature of the site. This will be a significant development in the area and provides an opportunity to have something that peeks above treeline which anchors and addresses plaza area.
- Distant view Ranelagh Town providing a gateway to Clonsilla.

3. Tree loss / retention

ABP sought further elaboration/discussion on:

- The extent of tree removal appears significant when compared with the tree survey.
- There is a lack of clarity in documents supplied with regard to the number of trees to be removed, the condition of such trees and the rationale for their removal.

PA Comments:

- Across this area of the city has below average tree canopy.
- Need to see a combined tree impact plan at application stage.
- Concern with block A1 pushing development into the tree belt.

Prospective Applicant's comments:

- The aim is to maximise tree retention to provide a usable amenity space.
- Organise site meeting with planning authority regarding the trees and to view the site.

- The siting of attenuation areas and surface water works have been considered to minimise loss of quality trees.
- Will be planting additional 208 trees, all high-quality trees increasing level of biodiversity through specific planting.

Further ABP comments:

- Extent of compensatory tree planting to be elaborated on at application stage.
- Identify tree loss required due to surface works and attenuation areas and the approach to the location of these features to justify the tree loss.
- The application should address biodiversity and ecological impacts arising.

4. Access and parking, including access for pedestrians and cyclists

ABP sought further elaboration/discussion on:

- Clarity on the function and requirement for the proposed Plaza area, full details will need to be provided.
- Adequacy of bicycle parking proposed across the scheme given low range of parking per BTR units, the lack of secure cycle parking at block F.
- Service vehicle access to the development
- Other items raised in the planning authority reports should be addressed.

PA Comments:

- Provision of cycle parking should reflect sustainable transport.
- Assessment of Sandford Road accessibility.
- Further consideration for refuse collection and servicing, documentation will need to be supplied at application stage.
- Quantum of car parking, consider overall parking strategy and management of development, scope to look at the ratios between BTR and BTS.
- Cycle path scheme Clonskeagh to City Centre under review.

Prospective Applicants comments:

- Clarity will be provided at application stage on items raised.
- Relying heavily people walking/commuting by foot, site within 1km of Luas.
- Can identify where additional bicycle parking can be provided if needed.
- Have met further with planning authority on traffic and transportation issues raised.
- 5/6 movements minimum at Sandford Road as opposed to significant movement at the principle Milltown Road entrance.
- Trying to align entrance design with the Clonskeagh cycle path.
- All car parking will be under the provision of a management company.

Further ABP comments:

- Analysis on visitor and secure cycle parking to be provided at application stage.
- Pedestrian cycle access through lands to be elaborated on further in relation to the routes, treatments and access points and associated elements.

5. Residential amenity – housing mix, daylighting, aspect, childcare

ABP sought further elaboration/discussion on:

- BTR and BTS scheme gives rise to different requirements, clarification needed on breakdown of proposed units.
- Detail where the Part V units fit in/ sit within the site.
- Arguably, the requirement is for 50% dual aspect units for such a site - refer to section 3.17 of the guidelines.
- The application documentation contains some inconsistencies in the identified levels of dual aspect units - unsure what is being counted as part of the figure.
- Provide a description of view / lighting of the through-units in block A. Some units in Block A face onto the covered space.
- In Block B and C some dual aspect face the adjoining block, windows and balconies close in proximity.
- Studio apartments have no private open space provision.
- Kitchen area excluded from calculations of daylighting of living spaces.
- The presentation of the results of daylight and sunlight analysis should be reviewed.

PA Comments:

- Site is 1.4 hectares so higher standard of 50% dual aspect should be achievable.
- Scope for some flexibility in standards given there are high quality amenity spaces, including with regard to the treatment of BTR studio apartments.
- Preferable there is an on-site childcare facility.

Prospective Applicant's comments:

- We consider the site a central accessible location beside transportation and employment opportunities, where the lower 33% dual aspect standard applies.
- Clarification with regard to dual aspect units will be provided at application stage. Through units are included in the calculation of dual aspect figure.
- The quality and extent of tenant amenities are high level making up for the relaxation of private amenity solely for BTR studio units.
- The scheme will be fully in accordance with BRE guidelines.
- Can look further into the provision childcare in the scheme, however the applicant is satisfied there is capacity within the area.

Further ABP comments:

- Day/sunlight assessment of site and assessment on the adjoining properties to be supplied.

6. Any other business

ABP sought further elaboration/discussion on:

- Further consultation to be had between the applicant and the planning authority.
- Regard should be had to the issues identified in the planning authority report on the prospective application.

PA Comments:

- Happy to facilitate a meeting with the prospective applicant to discuss any concerns or technical issues.

Prospective Applicant's comments:

- Will consult further with the planning authority.

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
November, 2020