



Case Reference / Description	Demolition of existing structures onsite including No. 23 Prussia Street, construction of 166 no. Build to Rent apartments and associated site works. Lands at 23-28 Prussia Street, Dublin 7.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	21 st July 2021	Start Time	10:00 am
Location	Remotely via Microsoft Teams	End Time	12:15 pm
Chairperson	Tom Rabbette	Executive Officer	Helen Keane

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Conor McGrath, Senior Planning Inspector
Helen Keane, Executive Officer

Representing Planning Authority

Klara Crowley, Executive Planner
Roisin Ni Dhubhda, Executive Planner, Roads Planning
Mary McDonald, Conservation Officer
Kieran O'Neill, Senior Landscape Architect, Parks Section

Representing Prospective Applicant:

Mary McGrath, Applicant
John Downey, Downey Planning & Architecture
Ronan Kelleher, Downey Planning & Architecture
Sandy Williams, Downey Planning & Architecture
Donna Ryan, Downey Planning & Architecture
Francis Wade, Lohan Donnelly Consulting Engineers

Joe McCallion, Downey Planning & Architecture
Karla Santos, Downey Planning & Architecture
Tom McGimsey, Mesh Architects
Kehinde Oluwatosin, Grangegorman Development Agency
Martin Rodgers, Martin Rodgers Consulting Ltd

Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, Planning Authority (PA) 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 once the Opinion has issued,
- ABP received a submission from the PA on 11th June 2021 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 14th May 2021 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 and Building Height Rationale**
- 2. Public Realm and relationship with adjoining lands**
- 3. Cultural Heritage - Protected Structures and Archaeology**
- 4. Residential Amenity, including daylighting**
- 5. Access and Parking**
- 6. Any Other Matters**

1. Development Strategy and Building Height Rationale

ABP Comments:

- Address the design rationale, strategy and approach to the building height
- Identify why this site is suited for higher buildings, noting that there are a number of other connections from Prussia Street into Grangegorman in this area.
- Provide further clarity at application stage on what is driving the scale of the proposed development.
- Ensure consistency in the description of heights in documentation.

Planning Authority's Comments:

- The planning authority welcomes the redevelopment of the site
- It is positive that the proposed development is not a shared living scheme
- Have concerns regarding height, design and the associated visual impact
- There is no justification for the 13 storey height, the proposed development site is not a landmark site
- The design is visually bland
- Refer to recommendations by the Parks and Landscape Department of the planning authority in terms of greening along Prussia St.
- Concerned that the proposed development would be overdevelopment of the site.
- The planning authority's concerns have been flagged from the outset
- The dominant height and scale of surrounding structures is 2-3 storeys and it is challenging to provide a transition from this scale to the higher buildings at Grangegorman.
- 13 storeys at the end of the terrace is too much
- Although the scale is better than it was previously and acknowledging the changes made to the scheme, the planning authority is still concerned.
- Provide greater elaboration on the rationale for the proposed development at application stage
- There are some inconsistencies in the heights referenced in the pre-application documentation

Prospective Applicant's Comments:

- The proposed development site is quite large.
- There is an emerging context of the area, with substantial development proposed for the Grangegorman campus and along Prussia St.
- The proposed development site is currently a wasteland which has been underutilised for years and the façade has been damaged.
- There has been quite a degree of consultation with an evolution of design
- The upper end of Prussia Street has an emerging context at a higher elevation than the subject site where there is an ease of transition
- Examples of appropriate use of brickwork include the new ESB headquarters and development on Camden St.
- The scale is lower onto the Prussia Street side of the proposed development than than onto the Grangegorman campus.
- Consider that 13 storeys is appropriate in order to provide a termination point to St. Brendan's Way in the Grangegorman campus. This is the key driver for the

heights. Previous 11-storey element would not have been sufficient to achieve this.

- There has been a 15% reduction in floor area since ABP-307759-20.
- The prospective applicant sees the site as a transition site from Prussia Street to Grangegorman and seeks to fit the proposed development in with the Grangegorman development plan
- The prospective applicant disagrees with the planning authority's comments that the proposed development is visually bland
- There is an inherent quality and texture to the materials
- Prussia Street is a historic, Georgian street and therefore the design should be restrained in its approach.
- The Prussia Street elevation has been broken down and is rich in detail.
- The scale is appropriate, the proposed development site should not be a missed opportunity for a site where scale can be increased

Grangegorman Development Agency

- The Development Agency does not comment on third party developments but has been in contact with the prospective applicant with regard to the proposed connection through the site.

2. Public Realm and relationship with adjoining lands

ABP Comments:

- Describe the rationale for the proposed building line having regard to the historic layout and pattern of development at this location
- Address the relationship with the block and no. 29 and how the proposed development will create or enhance activity along the front of the site
- Further detail is required on the interface with the protected structure, especially on the northern elevation. Drawings should clearly identify this structure.
- Address how the Bus Connects proposals may interface with the proposed development.
- Describe the design rationale for the proposed Gateway feature.
- Clarify the redline boundary for the works

Planning Authority's Comments:

- It is important that the ground plan is shown in context and not in isolation
- Clarification is required on the junction with the protected structure.
- There is a need to explain the building line which has been adopted.
- Provide clarity on the management of the open space / Serpentine Walk.

Prospective Applicant's Comments:

- The building line across the site varies from 2m to 4m and the proposed building will step in at no. 29.
- The development will seek to increase the footpath slightly. The Serpentine connection to Grangegorman accounts for approx. 19% of the site area.
- The majority of the balconies are on the south side of the building

- The public realm will be highly landscaped and usable and the café will provide animation to the street.
- The Gateway was subject to specific design and takes precedent from other stone gable buildings in the area.
- Will clarify the extent of works at Grangegorman wall to be included in the application redline boundary.
- The quantum of traffic flows generated by the development will be low.

Grangegorman Development Agency:

- There has been discussion and agreement regarding the interface of the development with Grangegorman and St. Brendan's Way.
- The delivery of this connection was a condition of approval of the Planning Scheme.
- The route will be open 24 hrs and Grangegorman development agency will be responsible for the management of the route and Gatehouse.

3. Cultural Heritage - Protected Structures and Archaeology

ABP Comments:

- Confirm the rationale for proposed interventions to Grangegorman wall.
- Clarity on the interface with no. 29 is required at application stage and the status of the northern boundary wall.
- Give further consideration of the relationship of the proposed development to the adjoining lands
- Re-examine the structures identified as included in the National Inventory of Architectural Heritage

Planning Authority's Comments:

- The planning authority would prefer that there are no additional openings in the Grangegorman boundary wall other than the large gateway
- Consider the northern boundary wall to no. 29 as part of the curtilage of the protected structure.
- Have consideration for buildings of importance, even if not on the National Inventory of Architectural Heritage

Prospective Applicant's Comments:

- There are 2 openings proposed in the Grangegorman boundary wall
- Will take the planning authority's comments regarding the wall opening into consideration
- Proximity to the protected structure is not an issue for the excavation work. Proposed 2m gap will protect foundations.

4. Residential Amenity, including daylighting

ABP Comments:

- There are some inconsistencies in the descriptions of communal facilities
- Have consideration for SPPR7 of the Sustainable Urban housing: Design Standards for New Apartments and the Build to Rent nature of the scheme
- Refer to para 3.30 of the guidelines on storage requirements and identify where any flexibility under SPPR8 is being availed of.
- Address daylighting aspects of the scheme
- Consistency required on the apartment numbering in the Daylight and Sunlight report and the architectural drawings
- Have consideration for recent judgements in the High Court on daylighting and sunlighting and the requirements for Ministerial Guidelines.
- Provide context for the description of the assessed impacts on daylight to adjoining properties.
- Consider typical values for daylighting and sunlighting in the area in order to identify reasonable expectations for this location.

Planning Authority's Comments:

- 68% of the proposed development are 1-bed units. More private communal residential amenities should be considered separate from the café and other public spaces.
- The planning authority would welcome additional indoor amenities
- Provide a wind microclimate study at application stage
- Provide clarity on what amenities are usable for residents only

Prospective Applicant's Comments:

- All units will be assessed for daylighting and sunlighting and will be using a higher level of 2% for kitchen living spaces.
- Will respond to the planning authority's comments at application stage.

5. Access and Parking

ABP Comments:

- Describe the rationale for the level of basement parking and how it fits with the minimal provision under SPPR8 of the Sustainable Urban Housing: Design Standards for New Apartments
- Clear proposals are required for the servicing and delivery requirements of the development.
- Basement design should demonstrate capacity to meet this requirement.
- Examine the layout of the basement car park entrance and interface with pedestrian footpath.
- Clarification is required whether Grangegorman Development Agency and TUD will take control of any other proposed connections from Prussia St.
- What is the intent with regard to vehicular access of the Serpentine Walkway as an access to Grangegorman.

Planning Authority's Comments:

- The proposed development is insufficient in terms of provision for servicing and deliveries. Clarity is required in this regard.
- The basement design should be subject to review.
- The planning authority does not favour set down areas at the front of the site
- All servicing should be conducted within the proposed development site
- The latest Bus Connects plans are from November 2020 and DCC can liaise with the applicant regarding potential Bus Connects changes.
- On-street waste collection issues are currently being examined but preference is for off-street collection.
- Will the Grangegorman connection be used by any service or construction traffic? There will be interaction with entrances to the development and pedestrian movements along this route.
- Address any traffic coming from such a secondary access in the traffic and transportation report at application stage.

Prospective Applicant's Comments:

- The 0.25 parking is low but the proposed development is Build to Rent and its management will be within the control of the landlord.
- An MMP will be implemented.
- Servicing and delivery requirements will be met at basement level. The development requires a basement regardless of car parking, to meet the requirements of services, cycle parking, plant etc.
- Basement height will accommodate small vans.
- Will take the planning authority's comments on servicing into consideration
- There will be bollard control of the Grangegorman connection.
- Clarification with regard to this route will be provided at application stage.

Grangegorman Development Agency:

- It is intended that this is the only connection which will be taken into their control, as required by the Planning Scheme.

6. Any Other Matters**ABP Comments:**

- Provide clarity at application stage on whether there is any soil contamination, address in waste management plan
- Ensure that there are no inconsistencies in the application documentation and be clear on what is being proposed
- In terms of EIA screening, have regard to all aspects of art. 299B(1)(b)(ii)(II), including 299B(1)(b)(ii)(II)(C)
- Illustrate the difference in ground levels between the proposed development site and Grangegorman.

Planning Authority's Comments:

- Provide detail on the access along the south of the proposed development at application stage
- Provide drawings on the new building and protected structures.
- Clarity required in relation to space/area between the protected structure and the proposed development.
- Allowing the city to grow must not be at the cost of the historical context
- Drawings should identify existing parapet heights on adjacent structures relative to the proposed development.

Prospective Applicant's Comments:

- Will seek to address all of the comments raised by the planning authority.
- A survey of boundary wall will be provided and they will liaise with GDA regarding and necessary consents.

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
July, 2021