



Case Reference / Description	Demolition of existing dwellings on site, construction of 567 no. Build to Rent, creche and associated site works. "Barrington Tower", Brennanstown Road, Dublin 18.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	15 th November, 2021	Start Time	10:00 am
Location	Via Microsoft Teams	End Time	11:30 am
Chairperson	Stephen O'Sullivan	Executive Officer	Hannah Cullen

Representing An Bord Pleanála:

Stephen O'Sullivan, Assistant Director of Planning
Fiona Fair, Senior Planning Inspector
Hannah Cullen, Executive Officer

Representing Prospective Applicant:

Aidan McLernon, Cairn Homes
Mark Boyle, Murray Associates
Kosta Kapetangiannis, Reddy A+U
Tony Reddy, Reddy Architecture
Joe Gibbons, Waterman Moylan
Emma Caulwell, Waterman Moylan
Lucy O'Connor, Howley Hayes Cooney Architecture
Trevor Sadler, McGill Planning
Brenda Butterly, McGill Planning

Representing Planning Authority

Anne Marie Wood Wolfe, A/Senior Executive Planner
Fiona Cummins, Executive Planner

Julie Craig, Conservation Officer
Donal Kearney, Assistant Parks Superintendent
Sean Keane, Senior Executive Engineer

Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, Planning Authority (PA) and introductions were made via Microsoft Teams having regard to the COVID-19 restrictions.

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 **1st October, 2021** providing the records of consultations held pursuant to section 247 of the Planning and Development Act, 2000, as amended 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 **6th September, 2021** formally requesting pre-application consultations with ABP. The prospective applicant advised of the need to comply with the definition of SHD as set out in the (Housing) and Residential Tenancies Act of 2016, as amended, in relation to thresholds of development. The representatives of ABP advised that the Inspector dealing with the pre-application consultation request would be different to the Inspector who would deal with the application when it was submitted. Recording of the meeting is prohibited.

Agenda

- 1. Traffic safety, access, permeability and connectivity.**
 - Capacity issues and connectivity with Luas and surrounding pedestrian and cycle network.
- 2. Architectural Design Approach:**
 - Layout, height, scale, massing, separation distances, materials and visual impact.
 - Photomontages and views within and across the site to the wider area.
 - Impact upon setting of the Protected Structure

3. Residential Amenity

- Overlooking to existing properties.
- Unit Mix
- Dual Aspect
- Daylight and Sunlight
- Overshadowing (both to proposed open space and neighbouring properties)
- Quantum and quality of outdoor amenity space
- Resident support services & facilities

4. Ecology, landscaping, loss of trees and woodlands.

5. Issues Raised in the CE Report incl.

- Transportation report,
- Drainage report,
- Conservation Officer report and
- Parks and Landscaping report.

6. Any Other Business

1. Traffic safety, access, permeability and connectivity.

ABP Comments:

- Clarity required on capacity issues and connectivity with Luas and surrounding pedestrian and cycle network.
- Clarity required on how the proposed development will connect in with the existing road network, in terms of vehicular, pedestrian and cycle connectivity along the Brennasntown Road.
- Clarity that rights across third party lands to facilitate road network upgrades and letters of consent will be sought in advance of an application.
- Further clarity on a timeframe for operation of the 'future LUAS stop', in tandem with development.

Prospective Applicant's Comments:

- There was a Part 8 scheme prepared by DLRCC in 2016 and a design proposal was proposed for upgrade of the Brennanstown Road. The Part 8 scheme was not however adopted by the elected members.
- A number of SHD applications have been permitted on the Brennanstown Road.
- Observed the approach for the approved Brennanstown Wood scheme and how it ties into the road improvement plans.
- There is an existing pedestrian linkage from the site to Glenamuck.
- An upgrade can be provided for the section of road from the proposed development to the Park Developments Scheme.
- LUAS stop is fully constructed awaiting an opening date due to waiting for outstanding direct development footfall and access. The proposed development is a major site on the north side of the Luas, there are currently a number of planning applications going through SDZ applications in line with their own masterplan on lands to the south of the site which would be key to opening the LUAS stop.
- A significant amount of development is required in order to facilitate the opening of the Luas stop.
- The subject proposal will benefit other developments, in particular Brennanstown Wood to the north west, in terms of connectivity to the Luas.

- With the provision of footpath works and connections Brennanstown Wood would benefit as it cuts down on pedestrian travel time to key routes.
- The Part 8 scheme designed by DLRCC for upgrade of Brennanstown Road does not include a cycle lane, the cycle lanes begin at Glenamuck Road. It is proposed the majority of residents would use the LUAS as the main form of transport.
- The applicant can deliver the next section of the Part 8 Scheme, provide road improvements and pedestrian connectivity, incl. 1.5m wide footpath.
- Aim to secure a letter of consent from the PA for the lands outside the red line to the frontage of the development.

Planning Authority's Comments:

- Brennanstown Road is a very narrow and the connection to the N11 is poor.
- The overall scale of the proposed scheme is not appropriate, the size of the road is an endangerment to public safety, even with the upgrade proposals it is deemed that the scale of development sought would not be suitable in this location.
- Brennanstown Road is a rural country road with a sylvan character, which should be taken into consideration.

2. Architectural Design Approach

ABP Comments:

- The development proposals could create a change in character to the Brennanstown Road, further clarity required to how the development will address the existing area.
- Justification required for the height/scale/density/massing of proposed apartment blocks in the context of the existing pattern of development in the area and in the context of existing Development Plan policy.
- Further cross sections showing the proposed development, including impact upon the setting of Barrington Tower and surrounding existing development.
- Further consideration of visual impact in terms of views within and across the site.
- Further consideration and justification of the separation distances between the blocks, overbearing and overshadowing, formation of character areas and way finding through the site.

Prospective Applicant's Comments:

- This site is a key site with an opportunity to open up the existing LUAS stop, it has the ability within the site to achieve scale and density on infill greenfield site given the public transport provision, site size and quality of boundaries and buffers. .
- There is high quality and quantity of landscape buffers to the relatively low scale neighbouring schemes (block height steps up within the heart of the scheme and is 3-5 storeys where it abuts the boundaries.)
- The units/blocks have been orientated north-south in an L-formation to maximise daylight and views of the Dublin Mountains.
- Accessibility to the Luas, determines scale, height and density.
- Distances of 30-40m from the development blocks to opposing gable ends are being achieved.
- The slope of the site has been used as an advantage to avoid overlooking.

- Separation distances between the blocks has cognisance to the sloping nature of the site. Bedrooms windows and windows to publicly accessible areas of units do not correlate. Cascading and off setting of floors of blocks.
- Acknowledge that there are some tight separation distances but consider this is not unusual. The design proposed mitigates the separation distances and has cognisance to residential amenity, daylight / sunlight, overbearing and overlooking.
- Approved Griffith Avenue and Donnybrook Gardens schemes are very similar precedent in relation to separation distances and sloping nature.
- Materiality consists of yellow and brown brick.
- Acknowledge the presence of Barrington Tower at the heart of the scheme. It is proposed as a focal point, re-establishing its setting and prospect tower use.
- Building height steps down and landscaped courtyards, inclusive of communal amenity and creche are proposed to achieve a set back from the tower.
- Currently there are a large number of existing trees and ornamental planting restricting views of the tower, in particular from Brennanstown Road.
- Propose to erect a light still frame stair to access the tower itself at limited times to enjoy the space and its views. The space around the tower is being activated by the non-residential uses.

Planning Authority's Comments:

- There is still a concern with height and massing to the adjacent properties.
- Blocks A, B, C and D have a continuous 5 storey façade which appears quite dominant.
- Further variety of materials to be used to break up the design of the blocks.
- A detailed landscape visual impact assessment is required at application stage.
- The Tower is currently obscured by planting, the length of the elevations in conjunction with the height of blocks A, B, C and D will dwarf this protected structure, further details are required in relation to impact upon the tower.
- Further consideration of 10m separation distances between blocks.
- Formation of character areas is a priority and cognisance to be had to Glendruid.
- Views into the site from Brennanstown road are critical. Denser elements of the scheme can be accommodated at the rear of the site sloping towards the river.

3. Residential Amenity

ABP Comments:

- Residential amenity in the context of possible/perceived impacts on existing residential properties, setbacks, site slope, landscaping and boundary treatments.
- There is a requirement to carry out a daylight and sunlight assessment as part of any future application. The assessment should set out where the proposal complies with relevant BS or BRE standards and any noncompliance or shortfall should be clearly identified, justified and mitigation measures proposed.
- Further consideration of over shadowing to amenity spaces within the development and to adjoining properties and their amenity spaces.
- Residential amenity in the context of separation distances between proposed blocks.

- Further consideration and justification of useability, location and layout of open space and public realm strategy.
- Further consideration and justification of the BTR model proposed in conjunction with level of resident support services and amenities.
- Clarity and further consideration in respect of material contravention of the Development Plan in terms of height, car parking, apartment development quantitative standards and Brennanstown Road Improvements. All material contravention issues to be advertised accordingly.

Prospective Applicant's Comments:

- Most public areas are achieving day/sunlight standards.
- The scheme will be build to rent (BTR) it will include resident support facilities. It will have exceedingly high quality and quantity of open space. The size of units exceeds minimum standards regardless of BTR status. Housing quality will be detailed comprehensively at application stage.
- A wind consultant is working with the team and a high-level report will be submitted at application stage detailing mitigation measures proposed.
- The proposals are in accordance with National Policy in relation to BTR unit mix, in this location there is a desire/rationale to improve the mix for 1-2 bed units in order to rebalance the overall area.
- Further information will be provided at application stage in relation to support facilities.
- It is noted the comments regarding size of retail space proposed at ground floor level.
- The retail floorspace shall be further detailed and justified in any future application, it is considered appropriate to have a retail unit within the development due to footfall.

Planning Authority's Comments:

- A full assessment with further details should be submitted in relation to microclimate at application stage.
- While the unit mix aligns with SPPR's there is a dominance of 1-2 bed units which is not considered best at this site to cater for the demand.
- Support services and a childcare demand assessment should be submitted at application stage.
- It is requested type of retail proposed is submitted.

4. Ecology, landscaping, loss of trees and woodland

ABP Comments:

- Clarity required in relation to a full EIAR being submitted at application stage given the scale of development.
- Further justification and clarity with respect to removal of mature trees on site.
- Further consideration of a tree protection strategy for trees to be retained.

Prospective Applicant's Comments:

- Protecting and enhancing the existing boundary planting to enhance the biodiversity of the site has been taken into account in the design.
- The majority of the impact is to the north of the folly onto Brennanstown Road.

- There is an opportunity to open up the site to the public, thereby, the need arises to remove vegetation from the site frontage.
- This is a unique site, the removal of the ornamental trees will not be a negative.
- Vegetation on the site is not woodland, the most important vegetation is to the eastern boundary where there is some mature screen planting. The proposal seeks to enhance the eastern boundary treatment and thereby enhance biodiversity.
- A full EIAR will be submitted at application stage.
- Further discussion will be sought with the parks department of the PA.
- Will explore play provision for varying ages of society.
- The linear nature of public open spaces tries to maximise cycle routes.
- The calculation of open space has been generous and stepped 5 m off boundaries.

Planning Authority's Comments:

- An ecological impact assessment should be submitted at application stage.
- The EIA should have a detailed section in relation to the trees to be retained on the east side of the site to address the concerns in relation to this particular area.
- All drawings for open space and landscaping should have cognisance to engineering services drawings.
- Welcome further discussion with the Parks Department.
- While the open space quantum is above standard, query its layout and location. There is a need to ensure tree root protection for trees proposed to be retained, to the eastern portion of the site. A disturbed environment can affect the long term life span of trees.
- Conscious of the sylvan character of the area.

5. Issues raised in the CE report

ABP Comments:

- Clarification that all items raised by the PA in their report submitted to the Board are addressed, further meetings should be sought to resolve outstanding issues.
- Further consideration, with respect to issues raised by the parks and landscape department.
- Further consideration, with respect to issues raised by the housing department with respect to Part V and changes to long term social leasing.
- Consideration that any arguments made by the applicant in relation to layout and design, visual impact, loss of trees and open space quantum, ecology and heritage will need to be justified at application stage.
- Consistency between all drawings and documentation, no room for inaccuracies, drawings need to be accurate and legible.

Prospective Applicant's Comments:

- All items raised in the drainage report can be addressed, further discussion will be sought with the PA's drainage department when proposals and details have been designed.
- Part V provision will be further explored with the PA's housing department.
- A public lighting report will be submitted with any future application.

Planning Authority's Comments:

- The applicant should contact the drainage department prior to submission of an application to the Board to discuss technical details.
- Absence of a lighting design report within the pre-application documentation, this should be submitted at application stage.
- Have not heard anything on the matter in relation to long term leasing and Part V provision for BTR.
- Further engagement with the Housing Department can be facilitated.

6. Any Other Business

ABP Comments:

- Any additional comments or queries not detailed in the agenda can be flagged at this stage for discussion.

Prospective Applicant's Comments:

- There is a balance of separation distances proposed throughout the site and between blocks to create a more defined character.
- Layout of blocks, proximity, range of distances, where there are tighter separation distances all aid to achieve a strong design rationale for defining spaces and creating way finding through the site.
- Permeability will be further addressed at application stage.
- It is not anticipated that Druids Glen to the east has development potential. A large area / arc of mature planting at this location. The proposed height is therefore appropriate for this area.

Planning Authority's Comments:

- Stress the importance of permeability and connectivity as a key factor within this development given its scale.
- Proximity between the blocks is noted but balance is required.
- Further information is required on daylight and sunlight and overshadowing of open spaces.

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.
- A Schedule of Documents and Drawings should be submitted with the Application.
- 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.

Stephen O'Sullivan
Assistant Director of Planning
November, 2021