



An
Bord
Pleanála

**S. 6(7) of Planning and
Development (Housing)
and Residential
Tenancies Act 2016 (as
amended)
Inspector's Report on
Recommended Opinion
ABP-302698-18**

Strategic Housing Development

299 apartments, crèche, café, office unit, gym, 26 no. car parking spaces and 360 no. bicycle spaces.

Location

Former Printworks / Smurfit Site,
Botanic Road, Glasnevin, Dublin 9.

Planning Authority

Dublin City Council

Prospective Applicant

Scanron Limited

Date of Consultation Meeting

7th November 2018

Date of Site Inspection

4th November 2018

Inspector

Sarah Moran

1.0 Introduction

- 1.1. Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the planning authority, the purpose of this report is to form a recommended opinion as to whether the documentation submitted with the consultation request under section 5(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 - (i) constitutes a reasonable basis for an application under section 4, or (ii) requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

2.0 Site Location and Description

- 2.1. The site is located on Botanic Road, Glasnevin, 3 km north of the city centre in a predominantly mature residential conservation area between Botanic Road and Drumcondra Road. The site is a former industrial premises (Print Works / Smurfit) with a stated area of 2.02 ha. It fronts onto Botanic Road near the neighbourhood corner known as Hart's Corner where it merges with the R135 Finglas Road. Both these roads are major arterial routes into the city and there is a bus and cycle lane along Botanic Road. There are residential properties and a hotel to the immediate east on Iona Park. To the south the site is adjacent to the rear lane / garages and / or gardens serving houses along Iona Road. The gable sides of nos. 31 and 31A Botanic Road overlook the site from the south. There are 2 storey houses on the opposite side of Botanic Road. The houses in the area date for the most part from the Edwardian era and the houses are typically 2 storey red-brick houses and styles also include the more decorative Art Nouveau and Arts and Crafts features. Together these styles and scale contribute to the character of this residential conservation area. The adjoining former Players Factory, including its granite façade, railings, gate, piers, plinth walls and red brick chimneystack are listed as a protected structure under the City Development Plan (RPS ref. no. 855). The complex is now in community / commercial use.
- 2.2. Vehicular access to the site is from Botanic Avenue, directly opposite the junction of merging traffic from R135. The original structures at the site have been demolished and development is currently under construction on foot of PL29N.246124 (as

amended). The site and has been filled and levelled and is therefore elevated above surrounding properties, particularly at the north east corner adjoining properties on Iona Park.

3.0 Proposed Strategic Housing Development

3.1. The development comprises 299 no. apartments as follows:

Apartment Type	No. of Units	%
1 bed	112	37%
2 bed	178	60%
3 bed	9	3%
Total	299	

The proposed apartments are arranged in 5 no. Blocks (A-E) ranging in height from 5 storeys (Block A), increasing to 7 storeys (Blocks B and E) and 9 storeys (Blocks C and D) over basement level in the centre of the site. The development incorporates 35 no. houses granted under the parent permission PL29N.241124, which are currently under construction (4 no. 4 bed houses and 31 no. 4+ bed houses). These are located along the southern and eastern site boundaries. The development has a stated residential density of c.165 units/ha, including the 35 no. houses permitted under PL29N.264124 (as amended).

3.2. The development also includes the following:

- Childcare facility (285 sq.m.) and play area, to have capacity for c. 89 no. users.
- Café (152 sq.m.)
- Office unit (173 sq.m.)
- Lap pool (216 sq.m.)
- Gym (164 sq.m.)
- 2.020 sq.m. or 10% public open space

- Proposed 236 no. car parking spaces and 360 no. cycle parking spaces. A total of 167 no. car parking spaces at basement level and the remainder at surface level including 5 no. shared car parking spaces.
- Part V proposal to deliver units off-site.
- Works to the public road are to be included in the red line site boundary.

4.0 Planning History

4.1. Reg. Ref. 3665/15 PL29N.246124

4.1.1. Permission granted for a residential scheme comprising 131 no. residential units (43 houses and 88 apartments in 4 blocks), café and childcare facility at the development site, with access to Botanic Road. Condition no. 2 of PL29N.246124 required the following amendments:

(a) Block D (duplex units nos. 120 to 131 inclusive) together with the road fronting this shall be omitted from the proposal. Units nos. 36 to 43 inclusive (including their rear garden boundaries) shall be moved 2 m to the west.

(b) Houses nos. 31 to 35 inclusive shall be moved 2 m to the west, thereby providing longer rear gardens to these units.

(c) The space thus released shall be incorporated into the public open space provision of the scheme.

4.2. Reg. Ref. 4267/17

4.2.1. Permission granted by Dublin City Council to amend the development permitted under PL29N.246124, to consist of amendments to permitted dwelling houses nos. 1 to 19 along the southern boundary of the site, with a change to permitted House Type T2 to provide for 4 no. 4-bed, 3-storey terrace units (c. 186 sq.m GFA, an increase of 23 sq.m each) and to House Type T3 to provide for 15 no. 5-bed, 3 storey terrace units (c.187.3 sq.m GFA, an increase of 24.3 sq.m each); revisions to the overall height, layout and elevations of the structures; reorganisation of allocated surface car parking within this portion of the site resulting in the provision of 1 no. additional space from that permitted. Permission also granted for modifications to the

boundary treatments and all other associated site excavation and site development works above and below ground.

4.3. Reg. Ref. 2133/18

- 4.3.1. Permission granted to amend the development permitted under PL29N.246124 to consist of amendments to permitted houses nos. 20 to 35 along the southern and eastern boundary of the site, with a change to permitted House Type T1 to provide for 16 no. 5-bed, 3 storey terrace units (c. 235.1 sq m GFA, an increase of 23.2 sq m each); revisions to layouts and elevations; no change to allocated surface car parking within this portion of the site; modifications to the boundary treatments and all other associated site excavation and site development works above and below ground.

5.0 **National and Local Planning Policy**

5.1. **Project Ireland 2040 - National Planning Framework**

- 5.1.1. The recently published National Planning Framework includes a specific Chapter, No. 6, entitled 'People Homes and Communities'. It includes 12 objectives among which Objective 27 seeks to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages. Objective 33 seeks to prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location. Objective 35 seeks to increase densities in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

5.2. **Section 28 Ministerial Guidelines**

- 5.2.1. Having considered the nature of the proposal, the receiving environment and the documentation on file, including the submissions from the planning authority, I am of the opinion that the directly relevant section 28 Ministerial Guidelines and other national policy documents are:

- ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ (including the associated ‘Urban Design Manual’)
- ‘Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities’ (March 2018)
- ‘Design Manual for Urban Roads and Streets’
- ‘The Architectural Heritage Protection Guidelines for Planning Authorities’
- ‘Childcare Facilities Guidelines for Planning Authorities’
- ‘Urban Development and Building Heights Guidelines for Planning Authorities’ Consultation Draft August 2018

5.3. Dublin City Development Plan 2016-2022

- 5.3.1. The site has the standard residential zoning objective ‘Z1 – To protect, provide and improve residential amenities’.
- 5.3.2. Development plan section 11.1.5.3 on protected structures.
- 5.3.3. Chapter 16 development standards. The following are noted in particular:
- 16.3.3 10% public open space requirement for all residential schemes.
 - 16.4 density standards. No maximum density. Target of 100 units / ha in the Housing Strategy.
 - 16.5 plot ratio. Permissible plot ratio for Z1 outer city is 0.5 – 2.0.
 - 16.6 site coverage. Z1 indicative site coverage 45%-60%

Development plan section 16.7 building height. The site is not located in an area designated as suitable for taller buildings, e.g. and LAP, SDZ or SDRA, therefore the ‘low rise’ category applies. A height limit of 16m applies for residential development in the outer city. The plan states the following in relation to Phibsborough:

Phibsborough will remain a low rise area with the exception of allowing for (i) up to a max of 19 m in the centre of the Smurfit site and immediately adjoining the proposed railway station at Cross Guns Bridge; and (ii) the addition of one additional storey of 4 m will be considered in relation to any proposals to re-clad the existing ‘tower’ at the Phibsboro Shopping Centre.

5.3.4. Development plan map J strategic transport and parking areas. The majority of the site is located within parking Area 2 with the western portion of the site in Area 3.

Table 16.1 car parking standards requires the following for Area 2:

- 1 space / dwelling
- 1 space / 300 sq.m. GFA office space
- 1 space / 150 sq.m. café seating area
- No standard for childcare facility or gym uses

Table 16.2 cycle parking standards for Area 2:

- 1 per residential unit all zones
- 1 space / 150 sq.m. shops and main street financial offices
- 1 space / 150 sq.m. café

5.4. **Phibsborough LAP (not adopted)**

5.4.1. The development site was identified as a key development site in both the Phibsborough-Mountjoy LAP 2008 and the draft Phibsborough LAP 2015 (not adopted). Both LAPs set out to provide a Local Site Framework Strategy for the Printworks / Smurfit site, which encompasses the development site and the neighbouring site to the north. It was envisaged that both sites would be developed to form “a high quality residential enclave within the context of the established residential area.” The 2008 LAP provided for local retail and community facilities with the Z10 zoning within the Dublin City Development Plan 2011-2017, an objective to facilitate mixed use development. This was subsequently revised to a Z1 zoning in the 2015 development plan. Both Framework Strategies included indicative urban form guidance with the 2008 LAP providing an indicative masterplan. The masterplan proposed that a pedestrian and cycle route pass through the sites to link Botanic Road with Iona Crescent. The protected structure in particular the chimney stack would form a focal point along this route and it was identified that a quality public space adjacent to the chimney should be provided to further enhance it as a neighbourhood landmark.

5.4.2. The draft 2015 LAP states that although the overall Printworks / Smurfit site is divided into two halves an integrated approach will be expected of any development

on one half of the site, particularly in relation to street design and ability to connect the southern half of the site to Iona Crescent. The focus should be on enhancing permeability and creating an attractive public realm. The draft 2015 LAP further states that parking for apartments should be provided at basement level to create an attractive pedestrian environment

6.0 Forming of the Opinion

6.1. Pursuant to section 6(7) of the Act of 2016, regard is had in the forming of the opinion to the documentation submitted by the prospective applicant; the planning authority submissions and the discussions which took place during the tripartite consultation meeting. I shall provide a brief detail on each of these elements hereunder.

6.2. Documentation Submitted

6.2.1. The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017. This information included, inter alia, the following:

Completed application form; details of section 247 consultations with Dublin City Council; site location map; site layout, floor plans, roof plans, elevations and sections; Architectural Design Statement; Apartment Type Schedule; Housing Quality Assessment; Preliminary Photomontages; Shadow / Sunlight / Internal Daylight Analysis Reports; Landscape Design Statement; Landscape Masterplan; Infrastructure Design Report; Irish Water response to pre-connection enquiry; Site Specific Flood Risk Assessment; Traffic and Transport Assessment Report; Outline Energy Conservation Approach & Building Services Strategy; Dublin City Council Letter of Consent for Works to Public Footpath; details of Part V proposals and discussion with Dublin City Council; Community and Social Infrastructure Audit.

Section 5(5)(b) of the Act of 2016 requires the submission of a statement that, in the prospective applicant's opinion, the proposal is consistent with both the relevant objectives of the development plan or local area plan concerned, and the relevant guidelines issued by the Minister under section 28 of the Act of 2000. These statements have been submitted, as required.

6.2.2. I have reviewed and considered all of the above mentioned documents and drawings.

6.3. **Planning Authority Submission**

6.3.1. In compliance with section 6(4)(b) of the 2016 Act the planning authority for the area in which the proposed development is located, Dublin City Council, submitted a copy of their section 247 consultations with the prospective applicant and also submitted their opinion in relation to the proposal. These were received by An Bord Pleanála on 26th June 2018.

6.3.2. The planning authority's 'opinion' included the following matters:

- The planning authority considers that the development is generally consistent with the Z1 zoning objective. The principle of apartment development at the site has been established under the previous permissions at the site. However, the planning authority seeks revisions to the design and scale of the development.
- Significant concerns in relation to the overall scale and design of the development, in particular Blocks B to E. By reason of their significant height, these blocks are considered to represent a significant and incongruent transition from the scale of the surrounding established residential neighbourhood, in particular the 3 storey houses currently under construction at the development site. Particular concern about the height of Blocks C and D as they contravene the provisions of the Dublin City Development Plan 2016-2022, which allows for a maximum building height of 24m within 500m of a rail hub. Development plan section 16.7.2 specifically provides for a maximum of 19m at the centre of the subject site. The planning authority recommends that the applicant be requested to omit upper floors from Blocks C and D, to ensure compliance with the Development Plan Building Height Strategy.
- Development is likely to have an impact on the character of the surrounding area. Need for detailed Visual Impact Analysis. Submitted photomontages depict only short range views, need for additional photomontages from intermediate distances from the site to include views from Botanic Road south of the junction

with Iona Road and views from Iona Road, east of the junction with Botanic Road. Also a topographical survey of the site.

- The design of the blocks is akin to an office development, corporate and homogenous in character, a more imaginative design would benefit the site. Lack of consideration of the character, scale and appearance of surrounding buildings and developments. Development would stand as an incongruent feature in the local cityscape. The Conservation Officer has expressed concerns about the design and scale of the proposal.
- The development would not provide a high quality residential environment, in particular due to its excessive scale. The public open space is fragmented and appears to have been largely designed around the spacing between individual apartment blocks. The practical useability of this space is questioned. A condition similar to condition no. 2 of PL29N.246124 should be required in this instance. Parks & Landscape Services Division seek compensatory tree planting along Botanic Road, due to the removal of the existing mature trees along the road frontage. While the gym and pool are welcomed, they do not constitute communal open space. There is a need to clarify how the development will comply with Development Plan minimum communal open space requirements.
- The proposed density is unacceptable due to concerns relating to the scale and height of the development and its potential impact on the future amenities on the site and visual amenities in the wider area.
- All apartments meet with the minimum requirements of the Apartment Guidelines and exceed them in many cases. 51% of apartments are indicated as exceeding the standards. The proposed housing mix is considered acceptable and in accordance with 2018 ministerial guidelines, specifically SPPR1.
- Concerns that the primary entrance to Block A from Botanic Road would be low quality. Concerns that the proposal incorporates a sub-station and cycle store on either side of the primary entrance, these elements should not be located along the front of the block. Further consideration should be given to the entrance to

Block A, to comply with development plan standards. Concerns regarding the recessed nature of entrances to Blocks B, C, D and E.

- Need for a detailed shadow and sunlight analysis of the scheme, to include lands to the immediate north of the site with regard to any future development in that area.
- The internal daylight study indicates that at least 6 apartment units would have a bedroom that fails to meet the required standard, as well as the living area. The majority of the affected units are single aspect. The planning authority recommends that the applicant be requested to further consider the block design and layout in order to ensure that all apartments achieve adequate daylight. If a small number of units do not meet the standard, there should be compensatory measures such as an enlarged aggregate floor area.
- The development will give rise to a requirement for a childcare facility with a capacity of up to 50 places. The proposed 30 place facility is considered acceptable on balance, if a Social and Community Audit indicates that there are extensive childcare facilities within a 1.5 km radius of the site.
- No Heritage Assessment submitted, this should be required as part of any application. The permission PL29N.246124 established the acceptability in principle of apartment blocks of c. 13.5m in height in relatively close proximity to the protected structure, in particular the red brick chimney stack.
- There is a Site of Archaeological Interest to the north at Cliftonville Road. Recommends that the development shall facilitate an archaeological appraisal of the site prior to the commencement of development.
- The Transportation Planning Division advises that adequate visibility splays be provided at the main access / egress and secondary egress.
- The majority of the site is located in car parking Area 2 with the western portion of the site in Area 3. The development plan requires a maximum of 1 space per residential unit, 1 parking space / 200 GFA office space and 1 parking space / 150 sq.m. of café seating area in area 2. There is no maximum parking standard for crèche facilities. The proposed parking provision is considered appropriate for

this location. Further details of how car parking spaces are allocated across the site should be provided. The proposed cycle parking provision is acceptable.

6.4. Submission of Irish Water

- 6.4.1. Irish Water has issued a Confirmation of Feasibility for the development of 265 residential units. The proposed development, as assessed for the Confirmation of Feasibility, is a standard connection, requiring no network or treatment plant upgrades for water or wastewater by either the customer or Irish Water. No third party consents are required for these connections to take place. Therefore, based on the Confirmation of Feasibility, Irish Water confirms that subject to a compliant water and wastewater layout and a valid connection agreement being put in place between Irish Water and the developer, the proposed connections to the Irish Water networks can be facilitated.

6.5. Submission of the Department of Culture, Heritage and the Gaeltacht

- 6.5.1. The DAU have made a submission in relation to archaeology issues. The following points are noted:
- The development is located in the vicinity of a Holy Well of archaeological interest (known as 'Dane's Well'), Recorded Monument DU018-010, which is subject to statutory protection in the Record of Monuments and Places, established under section 12 of the National Monuments (Amendment) Act 1994.
 - Given the 'brownfield' nature of the development site it is unknown what archaeological potential (if any) remains within the footprint of the development. This Department recommends that the developer engages the services of a suitably qualified archaeologist to conduct an Archaeological Impact Assessment Report for the proposed development. The report of the Archaeological Impact Assessment should accompany any planning application submitted.

6.6. Consultation Meeting

- 6.6.1. A section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 5th July 2018. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.

6.6.2. The main topics raised for discussion at the tripartite meeting were based on the Agenda that issued in advanced and contained the following issues:

1. Scale and height of development. Visual impacts. Urban design, public realm, landscaping. Proposed and existing residential amenity.
2. Impacts on the adjoining Protected Structure and Architectural Conservation Area. Archaeological Issues
3. Traffic impacts. Vehicular, pedestrian and cycle connections. Car and cycle parking provision
4. Any other matters

6.6.3. In relation to scale and height of development, visual impacts, urban design, public realm, landscaping, proposed and existing residential amenity, ABP representatives sought further elaboration / discussion on:

- PA Opinion relating to design, scale, elevations and development plan policy
- Development plan policy on height
- Details of proposed childcare facility
- Public open space provision within the scheme
- Quality of proposed residential accommodation, to include proportion of single aspect units and availability of daylight and sunlight.
- Impacts on residential amenities of adjacent properties

6.6.4. In relation to impacts on the adjoining protected structure and conservation area and archaeological issues, ABP representatives sought further elaboration / discussion on:

- Relationship with the brick chimney within the protected structure.
- Visual Impact Assessment required for wider area having regard to architectural sensitivity of area including the residential conservation area.
- Conservation assessment to be included in planning application
- Reconsider aesthetics of buildings, show how proposed development has been designed having regard to the surrounding area, address how protected

structures on adjoining site have been taken into consideration in the design of the development.

- Archaeological issues raised in the DAU submission.

6.6.5. In relation to traffic impacts, vehicular, pedestrian and cycle connections, car and cycle parking provision, ABP representatives sought further elaboration / discussion on:

- Traffic impacts having regard to traffic numbers being lower for extant permission
- Crèche parking and traffic movements
- Management / allocation of car parking. Consideration of other transport provided e.g. GoCar or similar service.

6.6.6. In relation to any other matters, ABP representatives sought further elaboration / discussion on:

- How to deal with extant permission, proposed development and red line site boundary.
- Include comprehensive picture at application stage, show how any legal / compliance issues are resolved.
- Further discussions with PA to ensure legal / compliance issues relating to extant permission are covered.
- Applicant to resolve Part V requirement with PA.
- Applicant to consider if the development is a material contravention of development plan policy on building height. Must state in notices if so.
- Applicant to satisfy themselves with EIA Regulations and screening requirements, due to the number of units and architectural heritage of the area it may be advisable to submit the information referred to in articles 299B(1)(b)(ii)(II) and 299B(1)(c) [if applicable] of the Planning and Development Regulations 2001-2018 in a standalone document as part of the application documentation.

6.6.7. Both the prospective applicant and the planning authority were given an opportunity to comment and respond to the issues raised by the representatives of ABP. Those comments and responses are recorded in the 'Record of Meeting ABP-302698-18'

which is on file. I have fully considered the responses and comments of the prospective applicant and planning authority in preparing the Recommended Opinion hereunder.

7.0 Conclusion and Recommendation

- 7.1. Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 7.2. I have examined all of the information and submissions before me including the documentation submitted by the prospective applicant, the submissions of the planning authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the section 28 Ministerial Guidelines, and local policy, via the statutory development plan for the area.
- 7.3. Having regard to all of the above, I recommend that further consideration and/or possible amendment of the documents submitted are required at application stage in respect of the following elements:

Design and scale of development

Residential amenity of development

Impacts on the development potential of the adjoining site to the north

details of which are set out in the Recommended Opinion below.

- 7.4. Having regard to the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act **requires further consideration and amendment in order to constitute a reasonable basis for an application** under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 7.5. I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the

specified information will assist the Board at application stage in its decision making process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

8.0 Recommended Opinion

- 8.1. An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.
- 8.2. Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála is of the opinion that the documentation submitted **requires further consideration and amendment to constitute a reasonable basis for an application** for strategic housing development to An Bord Pleanála.
- 8.3. In the opinion of An Bord Pleanála, the following issue needs to be addressed in the documents submitted to which section 5(5) of the Act of 2016 relates that could result in them constituting a reasonable basis for an application for strategic housing development:

Design and Scale of Development

Further consideration of the documents as they relate to the design and scale of the proposed development with regard to national and local planning policy, in particular the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas', the updated 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities', the draft 'Urban Developments and Building Heights Guidelines for Planning Authorities', the National Planning Framework and the relevant provisions of the Dublin City Development Plan 2016-2022. The prospective applicant should satisfy themselves that the proposed building heights provide the optimal urban design and architectural solution for this site and that it is of sufficient quality to ensure that the proposed development makes

a positive contribution to the character of the area over the long term. In this regard, the submitted documents should allow for further consideration of the elevational treatments and proposed materials. The proposed development shall have regard to the site's context and locational attributes including the adjacent protected structure and residential conservation area. In this regard an appropriate statement in relation to section 8(1)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016, that outlines consistency with the relevant development plan and that specifically addresses any matter that may be considered to materially contravene the said plan, if applicable, is required.

Residential Amenity of Development

Further consideration of the documents as they relate to the residential amenity of the proposed development. This consideration and justification should have regard to, inter alia, national and local planning policy, in particular the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' and the updated 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities'. The applicant should consider in particular the provision of single aspect apartments and the availability of daylight / sunlight within the units; the provision of quality, useable public open space within the scheme; the design and layout of ground floor accesses and internal circulation areas and the interaction with the other proposed land uses, i.e. childcare facility, office use and café, and with ancillary services. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

Impacts on the Development Potential of the Adjoining Site to the North

Further consideration of the documents as they relate to potential impacts on the development potential of the adjoining site to the north. This consideration and justification should have regard to, inter alia, the close proximity of the proposed development to the shared boundary (within 1.7m) and the height of the proposed blocks B, C, D and E against the shared boundary. While the masterplan strategy for the development of the subject site and the adjoining site is noted, it is further noted that the 2015 Phibsborough LAP was never adopted and therefore has no statutory status. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

8.4. Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. Photomontages, cross sections, visual impact analysis, shadow analysis and landscaping details to indicate potential visual impacts on the adjoining residential conservation area and on the setting of the adjacent protected structure, to include views from the wider area including Iona Road and Botanic Road.
2. Topographical survey of the development site.
3. Rationale for proposed childcare provision with regard to, inter alia, the 'Childcare Facilities Guidelines for Planning Authorities', circular letter PL 3/2016, and the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018), to provide details of existing childcare facilities in the area and demand for childcare provision within the proposed scheme. The applicant is advised to consult with the relevant Childcare Committee in relation to this matter prior to the submission of any application.
4. Rationale for the proposed car parking provision with regard to Dublin City Development Plan 2016-2022 Table 16.1 car parking standards and the performance related approach set out in the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018) in relation to infill sites in urban areas, to include a car parking management strategy, details of the allocation of car parking spaces to the proposed land uses and specific provision for the proposed car club spaces.
5. Daylight/Sunlight analysis, showing an acceptable level of residential amenity for future occupiers of the proposed development, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development. The analysis should also consider potential overshadowing impacts on adjoining residential areas and on the adjoining site to the north.
6. Heritage assessment to consider impacts on the adjacent protected structure and residential conservation area.

7. An Archaeological Impact Assessment which responds to the comments outlined in the report received by the Board from the National Monuments Service which is attached and which includes consideration of potential archaeological impacts of the construction of basement car parks.
 8. Traffic and Transport Impact Analysis, to consider cumulative impacts of permitted development in the area.
 9. AA screening report.
 10. The information referred to in article 299B(1)(b)(ii)(II) and 299B(1)(c) [if applicable] of the Planning and Development Regulations 2001-2018 in a standalone document.
- 8.5. Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:
1. The Minister for Culture, Heritage and the Gaeltacht
 2. The Heritage Council
 3. An Taisce
 4. An Chomhairle Ealaíon
 5. Fáilte Ireland
 6. Irish Water
 7. Transport Infrastructure Ireland
 8. National Transport Authority
 9. Dublin City Childcare Committee

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic

housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Sarah Moran

Senior Planning Inspector

14th November 2018