



An
Bord
Pleanála

**Case Reference:
ABP-310668-21**

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

**Proposed Development: 112 no. apartments and associated site works.
Balnagowan House, St. Mobhi Boithirin, Glasnevin, Dublin 9.**

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

1. Further consideration and/or justification of the documents as they relate to the relationship between the proposed development and the adjoining protected structure, Balnagowan House, which is identified as a building of national significance in the National Inventory of Architectural Heritage (NIAH), based on its special architectural, technical and artistic interest, and potential impacts on the character and setting of the structure.

The application should therefore be accompanied by a comprehensive Architectural Heritage Impact Assessment prepared in accordance with the provisions of the *Architectural Heritage Protection Guidelines for Planning*

Authorities, (Department of Arts, Heritage and the Gaeltacht). This assessment should have regard, inter alia, to the following points:

- i. In assessing the impacts of the development, the assessment should have regard to and address the comments of the planning authority, particularly in respect of the design and articulation, and the height, bulk and massing of the proposed development.
- ii. The assessment should examine the importance and architectural significance of the original gardens and landscape to the character and setting of the Protected Structure and include a statement as to how the proposed development takes account of such features and provides a landscape treatment appropriate to this site.
- iii. The assessment should examine the existing roadside boundary and assess the impact of the extent of removal proposed, and the potential to retain further sections of this boundary.
- iv. The description of proposed works to the protected structure should be accompanied by a set of plans, photographs and other drawings as appropriate, which clearly identify the rooms described (e.g. G.01) and the nature of those works. Conservation Specification should be included as part the application documentation as referenced on page 23 of the *“Report on the Architectural / Historic Significance of Balnagowan (Formerly Wendon) St. Mobhi Boithrin, Glasnein Dublin 9 & Observations on the Impact of the proposed Works.”*

Furthermore, 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:

- a)** Further consideration and/or justification of the documents as they relate to the height and design strategy having regard to the relationship with the character and setting of the protected structure and surrounding residential development. In this regard, the prospective applicant should satisfy themselves that the design strategy as it relates to height provides the optimal architectural solution for this site.
- b)** Further consideration of, and possible amendment to the documents and/or design proposals submitted, having regard to the relationship of the proposed development with the (Bons Secours) lands to the west of the site. It should be demonstrated that the proposed development would not prejudice any future development of those lands, having particular regard to the proximity of Blocks 2 and 3 to the western site boundary and proposed windows and balconies overlooking that boundary.
- c)** A method statement describing the proposed construction and excavation works should confirm that such works will not negatively impact on adjoining lands or on trees and / or vegetation located thereon. The statement should be accompanied by appropriate section drawings describing the relationship of the development with adjoining lands.
- d)** Further details of the proposed materials and finishes to the scheme. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details, which have due regard to the context of the site and in particular the character and setting of the adjoining protected structure. The details to be provided should also include the treatment of roof terraces, courtyards, landscaped areas and the public realm.
- e)** A report that addresses residential amenity, specifically how the development will limit potential impacts on adjoining properties in terms of overlooking and overbearing. Additional cross sections and contextual elevations should be provided to demonstrate the relationship between the proposed development

and adjoining properties on St. Mobhi Boithrin to the north and Mobhi Road to the east.

- f)** A comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity / open spaces, as well as potential impacts on daylight and sunlight to adjoining properties. In preparing such assessment regard should be had to the provisions of section 3.2 of the *Urban Development and Building Heights Guidelines for Planning Authorities* (2018) and to the approach outlined in guides like the BRE 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.
All assumptions made in the analysis should be clearly justified, including assumptions in relation to surface reflectance used in calculating daylight values in existing and proposed dwelling units.
- g)** Documentation should address the recommendation of Dublin City Council Archaeology Section that the subject site should be subjected to predevelopment strategic archaeological testing in order to assess the nature of possible archaeological deposits.
- h)** The application should be accompanied by a quality audit in accordance with Annex 4 of the Design Manual for Urban Roads and Streets (DMURS).
- i)** Documentation should address the issues raised in the report of the Dublin City Council Engineering Department – Drainage Division, dated 23/07/2021, and in the report of the Transportation Planning Division dated 20/07/2021 in relation to cycle parking provision and access to the proposed basement.
- j)** Further consideration and / or elaboration of the documents as they relate to the proposed cycle route to access basement parking. The scheme should provide convenient access to secure bicycle parking for residents, while avoiding potential conflicts with other users arising from the design of the route its function as described in the Landscape Design Report.

Also, 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, as amended:

- 1. Dublin City Council Childcare Committee**
- 2. Irish Water**
- 3. Heritage Council**
- 4. An Chomhairle Ealaíon**
- 5. An Taisce**
- 6. Minister for Housing, Local Government and Heritage (National Monuments, Architectural Heritage)**

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, 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 2020 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Rachel Kenny

Director of Planning

October, 2021