



An
Bord
Pleanála

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Case Reference: ABP-301910-18

Proposed Development: 159 no. residential units, crèche, completion of street network and link roads, additional pedestrian/cycle access and associated site works.
Old Golf Links Road and Tuite's Lane, Blackrock, Dundalk, Co. Louth.

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. Core Strategy

Further consideration/clarification of the documents as they relate to the rationale for the proposed release of Phase 2 lands having regard to the provisions of Policy CS2 of the County Development Plan which provides that only on completion of the development of 75% of Phase 1 lands shall subsequent phasing be considered for additional residential development. 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 address any matter that maybe considered to materially contravene the said plan should be provided. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

2. Waste water infrastructure constraints

Further to Item no. 1 above, consideration/clarification of the documents as they relate to the proposed release of Phase 2 residential lands having specific regard to the existing constraints of the Blackrock waste water treatment plant and that the proposed development may be considered premature having regard to the submission from Irish Water dated 17 July 2018 received by An Bord Pleanála indicating that this project is on Irish Water's Capital Investment Plan and that planning permission is required for such works.

3. Urban Design and Form

Further consideration of documents as they relate to the urban design and form of the proposed residential development having regard to, inter alia, the 'National Planning Framework, 2040', the provisions of the 'Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities' including the accompanying 'Design Manual' and the 'Design Manual for Urban Roads and Streets'. Consideration should be given to national and local policies for new residential developments to create compact urban places which, inter alia, are attractive with active streetscapes and offer good quality residential amenity for future residents. Further consideration should be given to the overall density including height of the proposed units having specific regard to the size of the site and proximity to local social and community infrastructure. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

4. Unit Mix, Typology and Residential Amenity

Further consideration of documents as they relate to the proposed unit mix, typology and provision of qualitative residential amenity for future occupants of the proposed residential units in particular the apartment units. A Housing Quality Assessment report should accompany any application demonstrating how residential units comply with, inter alia, Apartment Design Standards and in particular the provision of adequate storage areas and minimum aggregate bedroom floor areas. Specific regard should be given to the provisions of section 6.0 of the Sustainable Urban Housing: Design Standards for New

Apartments, Guidelines for Planning Authorities, 2018. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

5. Green Infrastructure

Further consideration/clarification of documents as they relate to the provision of green infrastructure within and adjoining the site and the inter-relationship of this infrastructure such as, inter alia, the archaeological and cultural value of the adjoining graveyard and creation of key vistas to the recorded monument, the functional and aesthetic value of the stream and how it creates a sense of place within the scheme, creation of a hierarchy of qualitative open spaces and incorporation of SuDS measures into the proposed development. Consideration should also be given to the accessibility, passive surveillance and level changes across the public open space areas. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

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:

1. Details of existing and proposed changes in contours/levels across the site. Photomontage images and cross-sections at appropriate intervals to illustrate the topography of the site, showing proposed dwellings/apartment blocks, access roads including any bridging over the stream and public open space areas. Photomontage images and cross sections should be provided indicating the proposed units relative to the graveyard.
2. A site-specific flood risk assessment that adequately addresses the potential for displaced waters including any bridging over the stream as a result of the proposed development. Any surface water management proposals should be considered in tandem with any Flood Risk Assessment, which should in turn accord with the requirements of 'The Planning System and Flood Risk Management Guidelines' (including the associated 'Technical Appendices'). The prospective applicant is advised to liaise with the planning authority regarding surface/storm water proposals prior to making an application.
3. Details of undergrounding or re-routing of any overhead ESB power or other utility lines or existing underground services located within the site.

4. A site layout plan indicating the full extent of any existing and/or proposed way leaves within the site.
5. A site layout plan indicating pedestrian and cycle connections through the development lands and any proposed future potential links. All potential future links should be provided up to the boundary of the site.
6. A phasing plan for the proposed development should be provided. The phasing arrangement should provide for attenuation proposals which are independent of each subsequent phase.
7. Landscaping proposals including an overall landscaping masterplan for the development site including the public open space. Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including boundary treatments should be submitted.
8. A site layout plan which clearly indicates what areas, including any pedestrian and cycle routes/connections, are to be taken in charge by the Local Authority.
9. Details in respect of the proposed childcare facility including inter alia, the approximate number of children and staff and type of childcare facility to be provided.

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:

1. Irish Water
2. The Heritage Council
3. Department of Culture, Heritage and the Gaeltacht (Development Applications Unit, Wexford)
4. An Taisce – the National Trust of Ireland
5. Inland Fisheries Ireland

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 An Bord Pleanála, 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.

Tom Rabbette
Assistant Director of Planning
August, 2018