



An
Bord
Pleanála

Record of Meeting ABP-300197-17

Case Reference / Description	138 no. residential units (100 no. apartments and 38 no. houses), internal roads, pedestrian and cycle paths and all associated site and infrastructural works. Brennanstown Road, Carrickmines, Dublin 18.		
Case Type	Section 5 Pre-Application Consultation Request		
1st/2nd/3rd Meeting	1 st Meeting		
Date:	21 st December, 2017	Start Time	10.00
Location	Office of An Bord Pleanála	End Time	12.00
Chairperson	Tom Rabbette	Executive Officer	Lianna Slowey

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Una Crosse, Senior Planning Inspector
Lianna Slowey, Executive Officer

Representing Prospective Applicant:

Dick Cuddihy, Park Developments Group
Michael Hussey, OMP Architects
John Keogh, DBFL Engineers (Civil – Services)
Thomas Jennings, DBFL Engineers (Traffic)
Thomas Burns, BSM Landscape and Environmental
John Spain, John Spain Associates Planning Consultants
Paul Turley, John Spain Associates Planning Consultants

Representing Planning Authority

Louise McGauran, Senior Planner
Michele Costello, A/Senior Executive Planner

Rebecca Greene, Executive Planner
Bernard Egan, Senior Executive Engineer Water & Drainage
Adrian Thompson, Senior Executive Engineer Transportation
Anne Murray, Biodiversity Officer
Elaine Carroll, Executive Engineer Water & Drainage

Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant and Planning Authority (PA), 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, along with that file, should an application arise following the conclusion of this consultation process.
- ABP received a submission from the PA on 11th December, 2017 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 opinion.
- 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 may 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 15th November, 2017 formally requesting pre-application consultations with ABP. The prospective applicant was advised of the need to comply with the 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. Traffic and Transportation
 - Brennanstown Road Improvements
 - Car Parking
 - Pedestrian connections (to public transport and amenities)
2. Surface water drainage
3. Existing Residential Amenity and Separation Distances to Boundaries
4. Childcare/Communal Facility
5. Any other matters

1. Traffic and Transportation

ABP sought further elaboration/discussion on:

- Brennanstown Road Improvements
- Car Parking
- Pedestrian connections (to public transport and amenities)

Planning Authority's comments re. Brennanstown Road Improvements:

- A recent traffic management scheme for Brennanstown Road did not receive Part 8 planning approval.
- A number of developments have subsequently been proposed along Brennanstown Road, each addressing a part of the overall traffic management scheme.
- A shuttle lane was proposed in order to reduce through traffic.
- A mini roundabout would provide some improvement but will not reduce through traffic.
- No pedestrian relief proposed for connectivity to Cabinteely village via Brennanstown Road.

Prospective Applicant's response re. Brennanstown Road Improvements:

- The proposed development aims to reinforce the logic behind the Part 8 traffic management scheme, i.e. reduce through traffic on Brennanstown Road.
- A 3 arm T-junction would be sufficient to accommodate peak traffic flows but would not reduce traffic movements along Brennanstown Road.
- The proposed continental style roundabout is compliant with DMURS. There is no flared approach, traffic movements will be slow in / slow out and reinforced with traffic calming table top ramps.
- Traffic counts and surveys based on the traffic movements of the adjoining residential development at Carrickmines Wood.
- Deliverability of link to Cabinteely Park is critical in order to provide pedestrian connectivity to urban centre and schools in the vicinity within walking distance of the proposed development.
- Bus stop within 450m of the proposed development site.
- Carrickmines Luas stop is located within 800m of the proposed development site with footpaths along both sides of Glenamuck Road.
- N11 Quality Bus Corridor and NTA Core Bus Corridor are within walking distance.
- The proposed development is not a material contravention of objective SLO 130 but aims to address the PA's policy and to make a contribution to improve road network.
- The prospective applicant showed drawing of Part 8 proposal outside Carrickmines Wood. A letter of consent from the PA has been received to extend the red line boundary in order to include footpath works and road improvements outside Carrickmines Wood. These works can be delivered as part of the proposed development. The works are within the public realm and involve widening the footpath into an existing verge.

Planning Authority's comments re. Prospective Applicant's response:

- The proposed development is a material contravention according to the wording of the relevant policy – “traffic management scheme to be addressed”.
- Acknowledged that the proposed development does provide some elements of the Part 8 scheme.
- Welcomed the proposal to include improvement works outside Carrickmines Wood but concerns remain re. through traffic and lack of pedestrian facilities.
- Expressed concern re. pedestrian safety in Cabinteely Park at off-peak times with preference for pedestrian footpath along public road – better quality of lighting and less anti-social behaviour.

Prospective Applicant's response to Planning Authority's comments:

- Agree with PA re. pedestrian safety and outlined alternative pedestrian route through residential streets offering passive security and public lighting from the neighbourhood centre to the proposed development site.
- Cabinteely Park opening hours vary depending on seasonal daylight hours.
- Full Traffic Impact Assessment will be completed before application stage, will liaise further with the Roads Authority.
- PA have a local objective on one hand but its implementation is not feasible.
- An informal cycle facility to/from Cabinteely Park is proposed keeping the historic link/archway to the park, a low volume of movement is envisaged.

Prospective Applicant's response re. Car Parking:

- Approx. 230 car parking spaces are proposed which allows for the provision of 2 spaces per house and 1 space per apartment. Visitor car parking spaces / disabled car parking spaces are also included as “float” spaces.
- Intend to meet the car parking standards as set in the County Development Plan.
- No issue reducing car parking provision to provide for 1 space per apartment and 2 spaces per house.

Planning Authority's comments re. Car Parking:

- New draft apartment guidelines may trump County Development Plan re. provision of car parking.
- There is demand for car parking spaces currently in the area.

Prospective Applicant's response re. Pedestrian Connections:

- Wayleave for pedestrian access through communal open space at Carrickmines Wood which facilitates link to Cabinteely Park.
- Prospective applicant set out landscape map to illustrate gate access agreement with Carrickmines Wood Management Company.
- Pedestrian entry point is proposed along the old avenue to Cabinteely Park.

ABP comments re. application stage:

- Need to consider material contravention and technical issues.
- Outline pedestrian connectivity to neighbourhood centre, schools, etc.
- Encourage as much agreement as possible between the prospective applicant and Roads Authority before application is lodged.

2. Surface Water Drainage

ABP sought further elaboration/discussion on:

- Drainage Planning report submitted as part of PA's Opinion report.

Prospective Applicant's response:

- The Prospective Applicant refers to the Drainage Planning report and items listed therein.
- A full design report was not submitted as part of pre-application consultation request documentation.
- Permissible site run-off and greenfield flow – will address in site investigation report at application stage.
- A hydrobrake flow control device as proposed by the PA is a conservative approach and is not applicable as there is no concern re. the receiving sewer environment.
- Item 5 re. right of way – connecting onto existing pipeline, need permission to access and increase water flow.
- Item 6 re. basement wall – pipes will be situated 1.6m from basement wall to allow for maintenance access.
- Item 7 re. piped ditch diversion – a land drain is in place; it is proposed to place drain into the existing ditch while land dries out during development of the site.
- Item 8 re. extent of green roofs – usually 6%.
- Item 9 re. swales – sustainable urban drainage measures such as permeable paving are proposed. High water table can be addressed with engineering solutions and will be addressed following site investigations.
- Items 10 and 11 re. design details of swales and bioretention areas – will submit details and calculations at application stage.
- Item 12 re. reassess tree line planting – will submit details at application stage.
- Item 13 re. southern part of site – will submit cross sections at application stage.
- Item 14 re. infiltration – SUDS requirement to design for interception to allow small amount of volume to avoid flash run-off.
- Items 15 and 16 – will submit cross sections/drawings at application stage.
- Item 17 re. Stormwater Audit – constrain re. timeframe for preparing drainage reports for application stage and awaiting auditor's response.

Planning Authority's comments:

- Item 5 re. right of way – connecting onto existing pipeline, a wayleave would be required in this area.
- Attenuation tanks are proposed for permeable paving but not for the Stormtech system – engineering reasons behind this need to be teased out.
- Stormwater Audit – independent assessment of storm water plan which allows an opportunity for the auditor to liaise with the PA before application is lodged. The auditor's assessment is not binding.
- Agree proposed measures in Drainage Planning report are conservative, will discuss matters further with Prospective Applicant to come up with site specific measures.

- Concern re. time lags and discharge to adjoining areas which may be subject to flooding.
- Propose larger strata/depth for green roofs and linear discharge for more control.
- Need to have agreement in place with PA before the application is lodged as there is no provision to request Further Information.

ABP comments re. application stage:

- Strongly advise as much agreement as possible be in place between the prospective applicant and Planning Authority in relation to drainage services before application is lodged. Outline position and reasoning if no agreement is reached.

3. Existing Residential Amenity and Separation Distances to Boundaries

ABP sought further elaboration/discussion on:

- Building heights – need for contiguous elevations and sections.

Prospective Applicant's response:

- Happy to work with issues raised by the PA in their Opinion report.
- Proposed apartment buildings are set to mirror the development at Carrickmines Wood to the northern boundary of the proposed development site.
- Separation distance of approx. 40m from existing apartment buildings.
- Separation distance of approx. 11m from site boundary – 3 pinch points identified with separation distances measuring 7m, 8m and approx. 6m at eastern block.
- Existing trees at Carrickmines Wood will offer a strong buffer and provide a visual distance effect from the proposed development site.
- There will be no major impact on tree root protection zones during construction.
- Footpath will have significant benefits from overlooking.
- Apartment buildings will be 3 storeys with attic space which will read as 4 storeys from the outside.
- Proposed basement car parking spaces will read more as undercroft than full basement.

Planning Authority's comments:

- Mindful of separation distance pinch points.
- Good to break down massing of proposed apartment blocks.
- Footpath may have to be taken in charge in future.

ABP comments re. application stage:

- Section drawings showing adjacent properties, boundary treatments, distance between opposing windows etc. should be submitted as part of the application documentation.

4. Childcare/Communal Facility

ABP sought further elaboration/discussion on:

- Absence of details re. what is envisaged for the communal facility in Block 1.

Prospective Applicant's response:

- Acknowledge the need to look at communal facility in more detail and develop a tangible use.
- Willing to provide a crèche as part of the proposed development, if required to.

Planning Authority's comments:

- Concern re. unviable crèche provision for a number of small developments in the area, if all argue that provision of a crèche is not required then there is potential for future problems re. childcare facilities in the area.
- There may be an opportunity in a larger development to provide a larger crèche facility.

ABP comments re. application stage:

- Look at impacts of the communal facility on the residential amenity of the proposed development.
- Outline justification if it is not proposed to provide a crèche facility
- Outline rationale and nature of uses for any proposed communal facility.

5. Any other matters

ABP invited parties to raise any outstanding matters.

Prospective Applicant's comments:

- Biodiversity – no issues with Biodiversity Officer's report submitted as part of PA's Opinion report. Studies are ongoing – no bat roosts identified. No impact on mature trees. Watercourse referred to in Biodiversity Officer's report is a drainage ditch which does not hold water for part of the year, no amphibian species were identified. No evidence of badgers on site.
- Part V – query if Part V costings are to be placed on standalone website.

Planning Authority's comments:

- Biodiversity – bat species present in Cabinteely Park. Include base line assessments, lighting impact studies and bat surveys with application.
- Parks Department – report prepared after the PA's Opinion report was submitted to ABP, a copy of this report was circulated to the prospective applicant at the meeting.

An Bord Pleanála's comments re. application stage:

- A complete copy of all application documentation is to be made available on the standalone website.

- Ensure there is no conflict between the information displayed in the architectural, engineering and landscape drawings submitted with the application.

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
January, 2018