



An  
Bord  
Pleanála

## Record of Meeting ABP-301257-18

<b>Case Reference / Description</b>	111 no. residential units and associated site works. Lands to the west of Enfield Relief Road, Enfield, Co. Meath.		
<b>Case Type</b>	Section 5 Pre-Application Consultation Request		
<b>1<sup>st</sup>/2<sup>nd</sup>/3<sup>rd</sup> Meeting</b>	1 <sup>st</sup> Meeting		
<b>Date:</b>	30 <sup>th</sup> April, 2018	<b>Start Time</b>	11:00
<b>Location</b>	Office of An Bord Pleanála	<b>End Time</b>	12:40
<b>Chairperson</b>	Tom Rabbette	<b>Executive Officer</b>	Lianna Slowey

### Representing An Bord Pleanála:

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

### Representing Prospective Applicant:

Michael Keogh, Legendstar Limited
John Cawley, Legendstar Limited
Jim Keogan, McCutcheon Halley Planning Consultants
Nathan Smith, McCutcheon Halley Planning Consultants
John Martin, John Flemming Architects
Ronan MacDiarmada, Ronan MacDiarmada and Associates Landscape Architects
Joe Gibbons, Waterman Moylan Engineering Consultants
Declan Moore, Moore Archaeological and Environmental Services

### Representing Planning Authority

Padraig Maguire, Senior Executive Planner, Planning Department
Mark Harrington, Senior Staff Officer, Planning Department

## **Apologies**

Sean Clarke, A/SEO, Planning Department

## **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 17<sup>th</sup> April, 2018 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 22<sup>nd</sup> March, 2018 formally requesting pre-application consultations with ABP. 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. Digital recording of the meeting is prohibited.

## **Agenda**

1. Settlement Status, Phasing and Zoning
2. Development strategy including density, housing mix and layout/open space
3. Water Supply and Wastewater Treatment
4. Surface Water and SuDS
5. Archaeology
6. Any other matters

## **1. Settlement Status, Phasing and Zoning**

### **ABP sought further elaboration/discussion on:**

- Proposed change of Enfield's settlement status – Variation 3 of County Development Plan.
- Sequential release of land/status of Phase 2 residential land zoning post 2019.
- Narrow piece of land zoned open space at boundary with soccer club, reason for inclusion as open space.

### **Planning Authority's comments:**

- Clarified during the meeting that Variation 3 of the County Development Plan has not as yet been approved but proposed that Enfield's settlement status changed from 'small town' to 'sustainable moderate growth town'.
- Department have advised that the review of development plans is stalled until Regional Spatial and Economic Strategy is adopted. Current plan will roll on until new plan is adopted, estimated 2019.
- Enfield is envisioned as a growth town. It is anticipated that some Phase 2 residential lands will become Phase 1 residential lands in the next plan.
- PA are precluded from granting permission on Phase 2 residential lands.
- No clear rationale why strip of land at soccer club boundary is zoned open space.
- Best use of this space is as presented by the prospective applicant in the documentation submitted.

### **Prospective Applicant's response:**

- County Development Plan refers to Enfield as 'small town', hence the analysis submitted with this request refers to Enfield as a 'small town'.
- Active land management and natural progression from phase 1 of Royal Oaks development, the prospective applicant owns and controls the Phase 2 residential lands to complete the build out of this scheme.
- Phase 1 of Royal Oaks development had a similar narrow strip of open space at boundary of soccer club which could be a result of a mapping discrepancy. The previous application adhered to this.

### **ABP comments re. application stage:**

- Address any references made to Enfield as a 'small town' at application stage in light of the proposed change to settlement status.
- Put forward argument for the release of Phase 2 lands. Outline why these Phase 2 residential lands should be developed before Phase 1 residential lands. Consider whether it would not be a material contravention of the County Development Plan.
- Clearly outline the rationale for narrow piece of open space at boundary with soccer club.

## **2. Development strategy including density, housing mix and layout/open space**

### **ABP sought further elaboration/discussion on:**

- Density and proposed settlement status of Enfield as a 'sustainable moderate growth town'.
- Greater variety of unit types/housing mix to achieve higher density/greater mix.
- Open space provision and layout, create strong urban edge with relief road and allow larger central open space area.
- Pedestrian connections to Enfield Main Street, good connectivity to relief road but no footpath along New Road.

### **Planning Authority's comments:**

- No provision at present for a footpath along New Road.

### **Prospective Applicant's response:**

- Can look at providing a footpath along site boundary with New Road.
- Open space/landscaping to provide habitats throughout the site, trees and proposed open space link into main open space of 'Royal Oaks' development.
- Layout of proposed open space can be looked at.
- The use of different materials is proposed, as per DMURS, to create a sense of place.
- County Development Plan recommends a 3.2m separation distance between houses which is an issue and has an effect on density.

### **Planning Authority's comments:**

- Separation distance of 2.3m/2.5m is generally applied to allow for side access.
- The proposed development site is at edge of Enfield, would seek higher density on sites closer to train station.

### **ABP comments re. application stage:**

- Pedestrian/cyclist routes should provide safe connections to destinations/ between desire lines.
- Previous SHD applications have been refused based on density/housing mix.
- Make a case at application stage re. separation distance between units.

## **3. Water Supply and Wastewater Treatment**

### **ABP sought further elaboration/discussion on:**

- Water supply – local network constraints, provision of borehole well on site as a temporary measure.
- Wastewater capacity – status of upgrade works to be completed by 2020/21.

### **Prospective Applicant's response:**

- Have met with Irish Water, proposed temporary solutions for borehole well were acceptable. Drilling of test well on site has not taken place yet.

- Irish Water's response to pre-connection enquiry was not subject to any conditions.
- Irish Water have indicated that they have received a number of pre-connection enquiries for large scale developments in the Enfield area.
- 10% spare capacity in network according to previous discussions with PA, should be sufficient capacity for 100 units to connect to.
- Need further discussions with Irish Water for assurance/certainty.
- Irish Water have appointed consultants for design of upgrade of Enfield Wastewater Treatment Plant.
- Biological treatment is main issue re. wastewater network.
- Propose a temporary wastewater treatment plant on site that could sit above ground and be taken away when no longer required. Will be maintained by the applicant, not proposed to be taken in charge.

**Planning Authority's comments:**

- Very limited spare capacity in Enfield's water supply network, significant investment required.
- On-site borehole is outside of Irish Water's remit.
- Significant increase in pre-connection enquires for Enfield area during the latter half of 2017.
- The proposed development is at the most advanced stage in Enfield area.
- Solutions to increase capacity of network have not been outlined by IW.
- Irish Water to give permission to connect to the water supply network.
- No commitment from Irish Water re. water supply but have commitment re. upgrade of Enfield Wastewater Treatment Plant, consultant has been appointed.
- Limited spare capacity of wastewater network.
- Need to be sure temporary solutions are temporary in nature and need to be sure of the delivery of public infrastructure.

**ABP comments re. application stage:**

- Documentation should be very clear re. local network constraints. Clearly outline what infrastructure is required, who will deliver the infrastructure, when the infrastructure will be delivered and if there is a separate consent process involved.
- SHD application may be considered premature if dependent on water supply/ wastewater infrastructure from a separate consent process.

**4. Surface Water and SuDS**

**ABP sought further elaboration/discussion on:**

- Proposed surface water treatment and SuDS measures.

**Prospective Applicant's response:**

- Existing storm water ditch along New Road with culvert under road. Discharge to occur before culvert. Propose to lay new pipe.

- Could incorporate swales around open space area.
- Percolation tests have been completed since pre-application consultation request was submitted. Good percolation results have been recorded, will be able to develop proposals further to incorporate filter drains, etc.
- Spoke to Local Area Engineer, no increase in water discharge to existing ditch.
- Percolation test results offer more discharge back to ground, low water table and presence of gravel in ground.

**Planning Authority's comments:**

- Maximise infiltration on site, welcome the inclusion of swales, basins, etc.
- Discharge – verify that capacity exists in local area.

**ABP comments re. application stage:**

- Strongly advise as much agreement as possible be in place in relation to technical matters (e.g. drainage, etc.) between the prospective applicant and Planning Authority/Irish Water before the application is lodged. Outline position and reasoning if no agreement is reached.
- Submit borehole test results, clearly label catchment areas, etc.

## 5. Archaeology

**ABP sought further elaboration/discussion on:**

- Cultural Heritage Impact Assessment submitted with request recommended that archaeological testing is carried out, clarify that Archaeological Testing Report also submitted with request is the response to that recommendation.

**Prospective Applicant's response:**

- The results of the testing recommended in the Cultural Heritage Impact Assessment are included in the Archaeological Testing Report, as submitted.
- No further testing is required – minimal risk.

**ABP comments re. application stage:**

- Referred the pre-application consultation request documentation to the National Monuments Service, Department of Culture, Heritage and the Gaeltacht for comment, a copy of any response received will be circulated with ABP's Opinion.

## 6. Any Other Matters

**ABP invited parties to raise any outstanding matters.**

**Planning Authority's comments:**

- Clarified settlement status of Enfield – under negotiation in Regional Spatial and Economic Strategy, current status is 'small growth town', envisioned it will become 'moderate sustainable growth town' in regional plan.
- Satisfied with Part V proposal.

### **ABP comments re. application stage:**

- Address future settlement status in any application, refer to National Planning Framework and recent apartment guidelines.

### **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](mailto: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](mailto:spatialplanning@water.ie)

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Tom Rabbette  
Assistant Director of Planning  
May, 2018