



An  
Bord  
Pleanála

## Record of Meeting

**ABP-304036-19**

<b>Description</b>	130 no. residential units, crèche and associated site works. Lands at Skerries Road, Palmer Road and Palmer Avenue, Rush, Co. Dublin.		
<b>Case Type</b>	Section 5 Pre-Application Consultation Request		
<b>Date:</b>	3 <sup>rd</sup> May	<b>Start Time</b>	10:30 a.m.
<b>Location</b>	Offices of An Bord Pleanála	<b>End Time</b>	12:00 p.m.
<b>Chairperson</b>	Rachel Kenny	<b>E.O.</b>	Ciaran Hand

### Representing An Bord Pleanála:

Rachel Kenny, Director of Planning
Erika Casey, Senior Planning Inspector
Ciaran Hand, Executive Officer

### Representing Prospective Applicant:

Ian Monaghan, The Skerries Road Partnership
Robert Keran (Planning Consultant), Virtus Project Management
Tim Darmody (Architect), Darmody Architecture
Jennifer Lynch (Architect), Darmody Architecture
Sean Barrett (Architect), Darmody Architecture
Owen Sullivan (Civil Engineer), Cronin Sutton Consulting Engineers
Niall Barrett (Traffic Engineer), Cronin Sutton Consulting Engineers
Sean Cannon – Applicant

### Representing Planning Authority

Carmel Brennan, Architects Department
Gemma Carr, Parks & Green Infrastructure Division
Niall McKiernan, Water Services
Daragh Sheedy, Water Services
Deirdre Fallon, Planning

## **Introduction**

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, Planning Authority (PA) and 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 18<sup>th</sup> April 2019 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 decision,
- 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 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 2019 formally requesting pre-application consultations with ABP. Prospective applicant advised of the need to comply with 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. Density: Having particular regard to the definition of net density set out in Appendix A of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009.
2. Development Strategy for the site including:
  - Overall site layout, urban design and architectural approach particularly with regard to siting of crèche, design of central boulevard, car parking layout, treatment of urban edges and public realm, building height and housing mix/typology.
  - Landscaping proposals and open space provision, in particular connections to adjacent Palmer Court development.
3. Roads infrastructure, access and parking including wider pedestrian and cycle connections.

4. Childcare/ provision of crèche –scale, catchment, etc.
5. Surface Water Drainage and Flooding
6. Any other matters.

**1. Density: Having particular regard to the definition of net density set out in Appendix A of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009.**

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

- Rationale for the density calculation.
- Why the open space, link road and creche are excluded from the density calculation.

**Planning Authority's comments:**

- Recognise the need for a minimum density of 35 units per hectare.

**Prospective Applicant's response:**

- Density was calculated in accordance with the 2009 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas.
- The link road was excluded in accordance with Appendix A of the guidelines.
- Two open spaces are excluded (they are on a distributor route and thus have wider accessibility).
- The crèche is excluded as it is social infrastructure similar to the provision of a school.
- The density is 37.7 units per hectare.

**Further ABP comments:**

- The East/West link road is a route through the site.
- This is required to access the site.
- Houses are served by this road and directly accessible from it.
- This is not the type of road to exclude in the context of the definition set out in the Guidelines.
- Open spaces serve the development and not the wider area.
- Difficult to justify the exclusion of open spaces.
- There is no precedent for excluding a crèche.
- The density of the development including the road, open space and crèche is c. 27/28 units per hectare which is below the national guidelines

## **2. Development Strategy for the site including:**

- **Overall site layout, urban design and architectural approach particularly with regard to siting of crèche, design of central boulevard, car parking layout, treatment of urban edges and public realm, building height and housing mix/typology.**
- **Landscaping proposals and open space provision, in particular connections to adjacent Palmer Court development.**

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

- The location and configuration of open space.
- Crèche location.
- Cycle and pedestrian routes.
- Interfaces with the public realm.
- Streetscape.
- Skerries Road access.
- Relationship to open space at Palmer Court

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

- Open space layout and design could be improved.
- Open space needs to be useable.
- There is no tree survey submitted.
- Two parallel roads proposed at St. Maur's Park. Landscape strip is narrow and not an ideal layout.
- The stone from the part of the wall to be removed should be reused elsewhere within the site
- The East/West road link should be delivered.
- Permeability is important.
- Play provision is needed in a central location and for different age groups.
- A link between Palmer Court and open space would be very welcome.
- Endeavour that open space will be centrally located with walking routes and pedestrian connections.

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

- Open space to the south of the development is in the ownership of the Council which is a constraint.
- Crèche location is due to the constraints of the site.
- The crèche site looks onto the front gardens of two houses and in this context, is considered an appropriate design response.
- In another location the crèche will impact more houses.
- Crèche location can be examined.
- Parking numbers serving crèche can be reduced and layout considered.
- Drop off points can be examined.
- Set down on the link road allows for circulation
- Units facing Palmer Avenue will be examined.
- On Skerries Road there will be a signalised junction with optimal visibility. This complies with TII standards.
- Road alignment will allow for residential dwellings on either side of the road.

- The entrance on Skerries Road is located centrally. There is no existing right of way. Entrance to existing dwelling can be reviewed.
- Part of a wall will be removed for access. Appropriate reuse of stone will be considered.
- Tree lines along the road will create a more enclosed space and will reduce speed
- Open space at Palmer Court is to facilitate pedestrians and cyclists.
- Open space layout will be considered.

**Further ABP comments:**

- Location of the crèche is close to the junction and set down is a concern.
- Justify interface linkages and if legal consents are required.
- A good quality urban edge and interface is required. Scheme is weak in this regard.
- There is a conflict as the car parking spaces are reversing onto a cycle and pedestrian track. Design of central boulevard to be considered in this context.
- Extensive provision of off street parking is contrary to DMURS which promotes street enclosure.
- The streetscape has no frontage or strong edge.
- Consider treatment of all urban edges including Skerries Road.
- There needs to be a consensus between parties about the treatment of the front boundary wall.
- Examine the unit mix and have regard to the changing demographics of the area.
- Address the two-metre-high wall between the open spaces at Palmer Court
- Clarify the connections and connectivity.
- Consider better enclosure of open spaces.

**3. Roads infrastructure, access and parking including wider pedestrian and cycle connections.**

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

- The roads treatment of Palmer Avenue.
- Upgrade works and interfaces.

**Planning Authority's comments:**

- There is not much visitor parking proposed.

**Prospective Applicant's response:**

- Looking to improve the streetscape and permeability.
- Go car and shared parking will be examined.

**Further ABP comments:**

- Clarify the proposed works.
- Explain who is carrying out the works and the timeline.
- Examine Go car and shared parking.
- Review parking layout.

#### **4. Childcare/ provision of crèche –scale, catchment, etc.**

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

- Crèche provision.

**Planning Authority's comments:**

- No comment

**Prospective Applicant's response:**

- Can submit a crèche justification.

**Further ABP comments:**

- Submit a justification for why a crèche is being proposed.
- Undertake a survey of the current crèche facilities in the area.

#### **5. Surface Water Drainage & Flooding**

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

- Flood risk.
- SUD's.

**Planning Authority's comments:**

- Consider impacts of Kenure Stream.
- Include climate change scenarios.
- Submit a mini feasibility study.
- Use as much green infrastructure as possible.
- SUD's cannot limit open space.
- If limiting open space below 10% a financial contribution will be sought

**Prospective Applicant's response:**

- There is a pipe slightly located within this development.
- In agreement with the P.A this pipe will be relocated.
- No flooding has been shown on maps. Impacts of Kenure Stream will be considered.
- In regard to storm drainage – the layout allows for attenuation proposals.
- Proposing underground storage facilities.
- Four tests have been carried out showing no infiltration.
- Swails will be used as much as possible.

**Further ABP comments:**

- Provide clear green infrastructure proposals and rationale if such proposals are excluded.

## 6. Any other matters

### ABP comments:

- Show all required legal consents and ownerships.
- There is no further information sought at application stage.

### Planning Authority's comments:

- No comment.

### Applicants Comments:

- No comment.

## Conclusions

### 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
- Proposed development must be specifically described in public notices as build to rent housing for long-term rental housing
- 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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Rachel Kenny,  
Director of Planning

May 2019