



An  
Bord  
Pleanála

## Record of Meeting ABP-304343-19

<b>Case Reference / Description</b>	1009 no. Build to rent apartments, creche and associated site works. Lands at and to the rear of the CB Packaging Site, Ninth Lock Road and the New Nangor Road, Clondalkin, Dublin 22.		
<b>Case Type</b>	Section 5 Pre-Application Consultation Request		
<b>Date:</b>	12 <sup>th</sup> June, 2019	<b>Start Time</b>	9.30am
<b>Location</b>	Offices of An Bord Pleanála	<b>End Time</b>	11.45am
<b>Chairperson</b>	Tom Rabbette	<b>Executive Officer</b>	Maeve Williams

### Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Stephen Rhys Thomas, Senior Planning Inspector
Maeve Williams, Executive Officer

### Representing Prospective Applicant:

Tom Dalton, Arbeten Limited
Brendan Duddy, Arbeten Limited
John Downey, Downey Planning
Donal Duffy, Downey Planning
Claude Maguire, White Ink Architects
Paul Crowe, TODD Architects
Stephen Diamond, Stephen Diamond Landscape Architects
Rodd Goodfellow, Walsh Goodfellow Consulting Engineers
Christy O'Sullivan, ILTP Consulting Engineers (Traffic and Transport)
John Keogan, TODD Architects
Claire McAteer – White Ink Architects

## Representing Planning Authority

Mick Mulhern, Director of Services, Land Use Planning and Transport
Jason Frehill, Senior Planner
Laurence Collieran, Senior Executive Parks Superintendent
Brendan Redmond, Assistant Parks Superintendent
William Purchell, Senior Executive Engineer (Water and Drainage)
Ronan Toft, Assistant Engineer (Water and Drainage)
Fergus Browne, Assistant Planner

### Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, South Dublin County Council (SDCC) 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 SDCC on 27<sup>th</sup> May, 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 SDCC 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 30<sup>th</sup> April, 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. Masterplan and Ownership,
2. DMURS - street hierarchy, pedestrian connectivity and cycle strategy,
3. Design Standards for New Apartments – resident amenity, space, quantum and distribution,
4. Residential Amenity – microclimate, wind, comfort and usability,
5. Landscape Masterplan – public transport reservation and site interface,
6. Car Parking – design, layout and quantum,
7. Site Services – surface water management,
8. Any other matters.

### **1. Masterplan and Ownership**

#### **ABP comments:**

- Clarity was sought from the prospective applicant regarding the ownership of the property in relation to the red boundary and the blue boundary lines outlined in the plans.
- How will the masterplan impact on the wider area, in particular, The Mill Centre e.g. transportation, access roads and traffic.

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

- The development is welcomed, but have concerns regarding integration with the existing and future built environment.
- It is a large-scale project and, in principle, do not object to the project.
- Clarity needed on several issues to address concerns of the Local County Councillors and local residents.
- It must be integrated and bring diversity to the streetscape and enhance the area.
- Concerned with how it will be integrated with the Mill Centre in the future and other adjacent areas
- Street alignment and future connectivity with adjacent areas is an important consideration.
- Issues that need to be discussed:
  - Where does this development fit into the SDCC county development plan?
  - How does it support the environment – all amenities should be within walking distant from the development.
- Framework of the development must include clear movement, open space and a public transport network.

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

- Consideration has been given to integration with potential future development on adjacent lands.
- Will ensure it is an urban development as opposed to a suburban development.
- The main aim and objective is to create a community environment for all occupants, this includes build to rent and build for sale occupants.
- Similar large-scale project at present in Wembley, United Kingdom.

#### **Further ABP comments:**

- Applicant advised to take into account the issues raised by SDCC.
- Further engagement with SDCC advisable.

## **2. DMURS - street hierarchy, pedestrian connectivity and cycle strategy**

### **ABP comments:**

- Further clarity regarding the following issues were sought: a better description of a street hierarchy within the development, road widths and less trafficked areas; in terms of pedestrian access to the south how will this space be passively supervised and overlooked; the cycle strategy could be better described and avoid crossing conflicts on roads.

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

- The development will be integrated with the Mill Centre, access points will change the way traffic moves through Clondalkin village.
- Dublin Bus (Bus Connects) does not pass the site, but the route can be extended with the new access point. There is provision for a new corridor which will connect to the Mill Centre and this will reduce car usage.
- Mill Centre access could be integrated into scheme at any point.
- Powerlines caused some of the constraints near Ninth Lock Road.
- Pedestrian Lane will need to be reconfigured to provide passive surveillance.
- Narrow lanes: The prospective applicants will create a new boundary to avoid loitering. It will be 2 meters in height and a slight change of level/fall which will need to be addressed.

### **Planning Authority's response:**

- Potential for blockages at the Old Nangor Road – should there be crashes or emergency measures need to be implemented, there are no suggested alternatives in the plans submitted.
- The Old Nangor Road is not a viable option to remove traffic from the area as it is very constrained.
- The link road should be more open to vehicles/traffic which are at least 3.5 tonnes.
- Moving through the site – drop curbs are evident.
- East/West Road along the red boundary line with Mill Centre. It is a combination of three sites at present, not impossible to have a vehicular link to the Ninth Lock Road.
- Pedestrian walkway should run 50/60 meters along the Old Nangor Road.

### **Further ABP comments:**

- Demonstrate how the road at the back of the Mill Centre be used as another linkage road.
- How will the prospective applicant view the wider context, for example: The Mill centre, the application site and the SDCC lands in the area.

### **3. Design Standards for New Apartments – resident amenity space quantum and distribution**

#### **ABP comments:**

- Two Guideline standards regarding this development – Build to rent and ownership, ensure the correct application of floor area standards and other aspects to do with amenity.
- Communal amenity spaces, describe the rationale for location and management.

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

- The site mediates between urban and suburban.
- Carparking underground and between block apartments.
- Management company yet to be decided. They may deem it necessary to close down certain open spaces at night. But main area of open space/linear park/connecting route through the site to remain open.
- Public open spaces provision requirement is +7,000sqm – this development provides 8,043sqm.
- Apartments will have private balcony or semi-private spaces.

#### **Planning Authority's response:**

- Landscape: open space level is on the podium.
- The car park ventilation scheme is vertical grill at the podium level, consider impacts on open space usability.
- Concerns over the quality of life, which includes: health of people/bio-diversity and climate change.
- SUDS should be viewed as alternative option. Alternative purpose is to sustain vegetation.
- At present the build to rent apartments are for long term lease – however, this could change after 20+ years. A guarantee is necessary on how this will be managed in the future in terms of amenities and cycling/pedestrian ways.

#### **Further ABP comments:**

- Internal open space for the public and inter-connectivity with the Mill Centre, are areas which will need to be addressed.

### **4. Residential Amenity – microclimate, wind, comfort and usability**

#### **ABP comments:**

- Further clarification on how issues such as microclimate and wind studies have informed the landscape design and usability.

#### **Planning Authority's response:**

- Urban forms that need to be considered: larger blocks impact on sunlight, sheltered spaces and wind tunnelling.
- Communal amenities to the south of the development are tight.

**Prospective Applicant's response:**

- A wind tunnelling report will be carried out. The prospective applicant believes it is valuable to have despite it not being necessary for this project (not particularly high).
- There will an EIAR report carried out, these issues will be addressed.
- Some roads will be used as access to the car park, but will double up as children's play areas.

**Further ABP comments:**

- Applicant should be able to demonstrate that residential amenity has considered all factors such as access to daylight/sunlight and usability of open spaces.

**5. Landscape Masterplan – public transport reservation and site interface****ABP comments:**

- More clarity surrounding the objective of the Development Plan to deliver public transport through the site and how this would impact upon public open space design.

**Planning Authority's response:**

- Public transport should not be looked at in isolation and should be looked at as a whole.
- Metro West is still part of the Development Plan for SDCC.
- Car parking ventilation grills – level changes are necessary.
- Biodiversity must be functional as opposed to aesthetically pleasing where trees only last a few years, they must have a long-life span.
- Podium level planting requires greater consideration (e.g. tree growth etc.)

**Prospective Applicant's response:**

- They understand the Metro West will not proceed in the near or medium future.
  - The development will be able to accommodate the Metro West should the project go ahead.
  - Alternatives car parking ventilation may not be aesthetically pleasing

**Further ABP comments:**

- Greater detail will be necessary to demonstrate how the development interfaces with Nangor Road and the back of the Mill Centre.
- Biodiversity of plants should be addressed to ensure the longevity of the vegetation.

**6. Car Parking – design, layout and quantum****ABP comments:**

- The number of car parking spaces should consider the availability of public transport and tenure proposed.
- In terms of layout, there are areas of surface car parking that detract from the overall urban design of the proposal.

**Prospective Applicant's comments:**

- They will have further discussion with National Transport Authority (NTA), regarding transport plans.
- Surface car parking 0.7 ratio.
- The carparking will be 24 hours to accommodate users, this will include Gocar, the dropping off of occupants to the amenities and public usage. There will be 20 – 50 car parking spaces provided for occasional usage by the public.
- They pylon and the powerlines have determined that this is the location for surface car parking.

**Planning Authority's response:**

- Surface car parking along the frontage of Nangor Road, is unsatisfactory. Adverse impact on the urban design layout at this location, needs to be reconsidered.
- Power lines are within the area where the car park is being ear-marked for the development.
- Issues about connecting to public transport were discussed.

**Further ABP comments:**

- Issues that concern the area in the north-west corner (adjacent the New Nangor Road) could be discussed further with SDCC to arrive at the best design solution at this prominent corner.

**7. Site Services – surface water management.****ABP comments:**

- Further clarity on site services required, particularly with regard to surface water infrastructure.

**Planning Authority's response:**

- Existing surface drain through site, proposed services should have regard to this.
- SUDS – should also be used as a measure for watering landscape features as well as attenuation.
- Note the diversion of the foul sewer.

**Prospective Applicant's comments:**

- Further discussion with Irish Water for this project is acknowledged but in principle there is no problem with the development.

**Further ABP comments:**

- Services provision to be agreed with relevant bodies before application is submitted.

**8. Any other matters:****Prospective Applicant's comments:**

- This is a mixed development and that the aim is to create a living space that can be enjoyed by all occupants whether it is for build to rent or build to buy.
- Agree it is important that all relevant bodies engage with each other prior to the making of an application.

**Planning Authority's comments:**

- How will the design of the development change if the development of the two other adjacent sites don't proceed?
- It was requested that further discussion between both parties regarding the design of the development should happen before stage three of the project begins.

**Further ABP comments:**

- Reiterated the importance of getting the EIAR properly assembled prior to the application submission and to note the requirement to engage with the DoE EIA Portal website.

**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
- 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  
June, 2019