

**An  
Bord  
Pleanála**

## **Record of Meeting ABP-304601-19**

<b>Case Reference / Description</b>	5 no. houses and 245 no. apartments, creche and associated site works. St. Edmunds, St. Lomans Road, Palmerstown, Dublin 20.		
<b>Case Type</b>	Section 5 Pre-Application Consultation Request		
<b>Date:</b>	15 <sup>th</sup> July, 2019	<b>Start Time</b>	2.30 pm
<b>Location</b>	Offices of An Bord Pleanála	<b>End Time</b>	3.50 pm
<b>Chairperson</b>	Tom Rabbette	<b>Executive Officer</b>	Cora Cunningham

### **Representing An Bord Pleanála:**

Tom Rabbette, Assistant Director of Planning
Una O'Neill, Senior Planning Inspector
Cora Cunningham, Executive Officer

### **Representing Prospective Applicant:**

Trevor Sadler, McGill Planning
Nicky Casey, McGill Planning
Shane Walsh, MCORM Architects
John Hoare, Applicant
Sean O'Neill, Applicant
Michael Looney, Applicant
Robert McGrath, Kavanagh Burke Engineering
Ronan MacDiarmada, Landscape Architect
Michael Moran, TPS Traffic Engineers
David Ledwith, MCORM Architects

## Representing Planning Authority

Hazel Craigie, Senior Planner
Fiona Redmond, Senior Executive Planner
John Hegarty, Senior Executive Engineer (Roads)
Robert Roche, Assistant Engineer (Roads)
Laurence Colleran, Senior Executive Parks Superintendent
Ronan Toft, Assistant Engineer (Water and Drainage)
Naomi Downes, Student Planner

### 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 1<sup>st</sup> July, 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 4<sup>th</sup> June, 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. Development strategy including density, layout, design, interface with and quality of public realm/streetscape with particular regard to Block 1, permeability, location and quality of open space, landscape plan (SuDs), parking, crèche (scale)
2. Compliance with 2018 guidelines on the design of new apartments
3. Traffic and transportation - capacity of surrounding road network; bus network; pedestrian movement; compliance with DMURS
4. Site services, SuDs, and flood risk
5. Any other matters

### **1. Development strategy including density, layout, design, interface with and quality of public realm/streetscape with particular regard to Block 1, permeability, location and quality of open space, landscape plan (SuDs), parking, crèche (scale)**

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

- 12 criteria addressed in Statement of Consistency
- Issues raised in PA Opinion in relation to scale, massing and interaction with streetscape

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

- The development has been informed by the site context. Previous permission on proposed site had regard to proximity to public transport and Liffey Valley Centre in relation to this development.
- Higher density proposed here having regard to adjoining developments.
- Had regard to Ballydowd High Support Special School and traveller site in designing proposed development, sensitive in relation to overlooking and boundary treatments.
- Applicant has been in ongoing discussions with adjoining school to facilitate protection of their privacy/mitigate overlooking in the design.
- Had regard to lands in PA ownership in creation of a pedestrian access to the east and to improve this edge.
- Fingers created to allow sunlight/daylight into courtyards at +1 and turning blocks at corners.
- Open space location provides setback from school, units located in such a way to provide a frame of open space for the buildings.
- Proposal provides for strong east west connections, with direct pedestrian access onto the Fonthill Road and west into the neighbouring scheme. There will be permeability across the boundary of the site/between the trees across the existing access road and there will be no boundary proposed between the existing trees. Applicant will address issues raised in PA Opinion in relation to permeability.
- Block 1: Living space opens onto podium level, own door activity similar to Hanover Quay, with living spaces onto podium courtyards allowing for more light and more private amenity for residents. The design with the podium works better if the living rooms are at first floor level and bedrooms at ground level, backing onto undercroft area.

- Issue raised of street level activity with bedrooms at street level could be addressed through design of an additional defensible area at the street edge so that it feels more private. Will look at improving quality of units on foot of comments raised in PA Opinion.
- Significant amount of car parking provided for at undercroft level in order to remove parking from public realm.
- Will look at removal of some surface car parking in order to create pedestrian access around proposed development and will allow for emergency access into site, without creation of a full access.
- Venting raised at podium level with planting around it – will examine the size of these vents to ensure amenity of space is not detracted from.
- Hierarchy of green measures to ensure attenuation tank is as small as possible
- Open space proposed as kick about area, informal play areas work better.
- Open space looked at in conjunction with open space of overall development, provision of kick about required here as other play areas are provided for in the existing development.
- Will discuss further issues in relation to apartment block with PA.
- Scheme will be managed, no intention to have it taken in charge by PA.
- Rainguards, green roofs and tree pits proposed, no permeable paving proposed as Roads Department not in favour, swales are proposed in other areas of proposed development. Will discuss SuDs measures further with PA.
- Based on current guidelines crèche size is adequate. Consulted with Childcare Committee, awaiting response, array of crèche facilities available in the area.

**Planning Authority's comments:**

- Overall satisfied with design approach.
- How can activity at street level be achieved?
- Satisfied with reasons for open space being located in area proposed.
- Could consider reduction of surface car parking spaces to allow for larger apartment block.
- Proposed development is located along a Bus Connect route and applicant should be aware of any requirements in this regard.
- Applicant to have regard to Development Plan in relation to SuDs and use SuDS as a way to improve biodiversity through potential for surface level features instead of approach of just a tank.
- Attenuation tanks proposed within amenity area
- SuDs provision not included on lands within PA ownership – this area could be used as part of the SuDS strategy to manage run off for this area. Applicant to explore this further.

**Further ABP comments:**

- Justify level of activity at street level and passive surveillance from having bedrooms at the ground level – this will be a busy east-west street.
- Need to set out the rationale for designing living rooms at first floor level instead of at street level and consider in your rationale the impact on activity/ passive surveillance at the street level. Examples from other areas as suggested can be set out.

- Explore level of undercroft car parking proposed. Is there scope for a design that facilitates some living spaces at street level?
- Address daylight/sunlight analysis in relation to apartments, in particular consider additional analysis of units in Core 2 some of which appear constrained.
- Set out the proposed level of open space relative to the street given a stormtech attenuation unit is proposed within it and provide cross sections.
- Indicate location on the plan of the 2.4 metre walls recommended by the noise survey.
- Address overall unit mix, open space provision, and provide rationale for what is proposed.
- Landscape proposals submitted show trees on main access avenue, which have a significant amenity value, have a 10-year lifespan. Suggest that a landscape management plan be provided in relation to the trees on the site and how they can be replaced/supplemented in a phased way.
- Request that the site history establish the total number of units and unit mix of the entire area of the existing St. Edmund's development, which was originally permitted as a single development including this application site.
- Provide rationale including figures in relation to crèche size proposed, given inter alia the level of development on the entirety of the St. Edmund's development. It is noted a crèche was planned for originally at this location to serve entire development and no crèche has been built to date.

## **2. Compliance with 2018 guidelines on the design of new apartments**

### **ABP comments:**

- Ensure Schedule of Accommodation meets standards and ensure figures are correct, eg in relation to storage.
- Error on application form relating to ref number of planning history file.

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

- Will review figures for application.

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

- Ensure guidelines are adhered to.

## **3. Traffic and transportation - capacity of surrounding road network; bus network; pedestrian movement; compliance with DMURS**

### **ABP comments:**

- A full Traffic Impact Assessment should be submitted with the application. A traffic report has been submitted with the pre-app, not a TIA.
- Discussion around pedestrian access to bus stops.

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

- TIA submitted, some areas need to be expanded on for application.
- Pedestrian Access Report submitted.
- Consider extending footpath to allow for better connections to bus route, will discuss further with PA.
- Moving bus stop may be a consideration

- 2<sup>nd</sup> access to proposed site can be facilitated for emergency access, can be designed so that it's not an obvious entrance.

**Planning Authority's comments:**

- Discussions at section 247 meetings resulted in PA lands being included as part of proposed development.
- Consider discussions with NTA and Bus Connects, delivery of connections may form bigger proposals with NTA.
- Prefer 2<sup>nd</sup> access to proposed site but accept site constraints and satisfied with proposals.

**4. Site services, SuDs, and flood risk**

**ABP comments:**

- Issues discussed above

**5. Any other matters**

**Planning Authority's comments:**

- Massing and design, consider how to break up massing.
- Concern over level of vents proposed, consider usability of space.

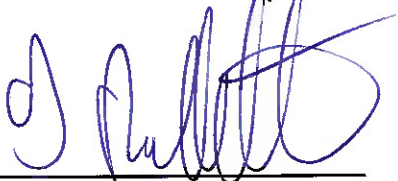
**Applicants Comments:**

- Will consider introduction of different materials used in finishes in order to break up massing.
- Reduction of visual ventilation required at podium level.
- Design approach will allow balance to streetscape and light into buildings.

**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)



Tom Rabbette  
Assistant Director of Planning

07/08/2019