



Description	163 no. houses, creche and associated site works at Rowlestown, Fingal, Co. Dublin.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	17 th July 2019	Start Time	14.20
Location	Offices of An Bord Pleanála	End Time	15.40
Chairperson	Tom Rabbette	E.O.	Mark Kiely

Representing An Bord Pleanála:

Tom Rabbette - Assistant Director of Planning

Joanna Kelly - Senior Planning Inspector

Mark Kiely – Executive Officer

Representing Prospective Applicant:

Name:	Organisation/Role:
Willie Murray	Planning consultant
David Armstrong	Planning consultant
Fred Wilson	Architect
Mark Keating	Client representative
Ian Worrell	Engineer
Ronan MacDiarmuida	Landscape Architect

Representing Planning Authority:

Name:	Organisation/Role:
Claire Mc Veigh	Senior Executive Planner
Gemma Carr	Parks Superintendent
Daragh Sheedy	Executive Engineer
Jennifer Johnston	Assistant Engineer
Ragina Thompson	Executive 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 **3rd 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 the **7th of 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. Principle of development to include consideration of Core Strategy in Fingal Development Plan and residential density.

ABP sought further elaboration/discussion on:

- Status of Rowlestown Local Area Plan (LAP),
- How the proposed development is consistent with the core strategy and settlement hierarchy in CDP
- LAP states that no more than fifteen houses are to be built at one time and no more than 150 houses in total and justification for exceeding these figures
- How the proposal is consistent with the provisions of the RSES in particular need for “catch up services in rapidly growing commuter towns”.

Prospective Applicant’s response:

- Feels that higher densities are required to sustain services in Rowlestown,
- Precedents have been set with previously granted applications,
- Quality of building is high and the applicant intends on following building guidelines,
- The proposed site is on the edge of the city and the applicant intends on complying with the national guidelines in terms of density
- The area is well serviced with amenities and infrastructure,
- There is a shop and school
- The proposed development would help populate school, shop and local clubs,
- Whilst the development is for 163 houses, it is planned that it would be built in three phases,
- Residents would benefit from footpaths etc which the applicant are willing to provide,
- Area is well serviced by public transport and the area will be incorporated into the bus connect plan,
- The proposed development would provide an economic improvement for local shops.

Planning Authority’s (PA) comments:

- In terms of the Local Area Plan (LAP), no new LAP has commenced, therefore, out of date LAP dated 2013 will be used,
- The PA has difficulty with the number of units and the potential impact on lands,

- Recognises that some increase in residential housing could be needed depending on county need,
- With regard to the scale of development, the PA would be looking to have this application refused.

ABP further comments:

- Must have clear rationale in justifying density and quantum of development having regard to inter alia local planning context
- The applicant needs to demonstrate the village can sustain a development of the scale proposed
- Suggest that the applicant has regard to recent legal SHD judgements which refers to core strategy

2. Urban Design and Layout having regard to village setting.

ABP sought further elaboration/discussion on:

- Proposed layout and urban design approach and how the existing village character would be retained
- Land-use zoning objectives and potential encroachment into agricultural lands
- Provisions of the LAP in particular section 4.7 and need to demonstrate how the proposal has had regard to these provisions
- Extent of hedgerow and tree removal and how existing village character could be retained
- Justification for the location of the crèche

Prospective Applicant's response:

- Whilst the removal of trees and hedgerows would take place, the applicant seeks to keep some trees and hedgerows in order to keep within the character of the village,
- For example, the applicant seeks to retain hedgerows near the school,
- Whilst three entrances to the site was proposed, the applicant wishes to reduce this to two entrances in order to keep trees,
- The applicant seeks to plant mature trees to replace trees removed,
- The crèche will have open space with trees and good access,
- The applicant seeks to keep greenway and cycle route near playground and school,
- The applicant outlines difficulty in keeping trees whilst also widening road,

- The layout was planned with the school in mind,
- When retaining hedgerows, the applicant wishes to give them the space they need – greenway to incorporate this
- The applicant wants to try and keep the already existing village feel,
- Applicant followed village design layout whilst densifying it.

Planning Authority's (PA) comments:

- Development boundary and land zoning should be made clear at application stage,
- Urban layout is an issue for the PA and would be recommending refusal on this
- Welcome the retention of hedgerows but adequate space needs to be given to ensure hedgerows are retained in the longer term
- Hedgerows too close to residential homes could attract unwanted rodents such as rats, suggest a greater set-back from houses
- The PA are open to the use of informal paths in keeping with rural village character,
- Large open spaces welcome but must be usable.

ABP further comments:

- Extent of landholding should be clear and rationale for any encroachment of the public open space onto agricultural lands should be justified having regard to the settlement boundary indicated in the LAP
- Proposed development may be considered suburban and suggest layout needs to be further considered particularly in context of LAP provisions
- Concerns that the proposed development may be very car dominant
- It may be considered that the suburban feel of the proposed development is at odds with the character of the existing village,
- More hedgerows seem to be removed than retained,
- Suggest that the design statement should examine the locational context in more detail and the development strategy should respond to this
- Existing key buildings such as school and church etc. could act as focal points in terms of layout,
- Crèche and school could be linked so as to minimise traffic movements also need to consider impact on existing residential amenity of property adjacent to proposed crèche

3. Movement and Connectivity to include DMURS and traffic impacts

ABP sought further elaboration/discussion on:

- Connections and linkages from development site to existing amenities in the village
- Green infrastructure networks and the strategic linkages of these networks
- Extent of road/footpath upgrades and widening proposed and whether they are within the red-line boundary

Prospective Applicant's response:

- Want to have the cycle link off road and to go along hedgerows,
- Applicant admits that balancing the retention of hedgerows and maintaining proposed house density is difficult, and wishes flexibility with this regard,
- Applicant plans to widen roads and works are within red-line boundary
- Requires guidance as to which roads and paths need updating and implementation.

Planning Authority's (PA) comments:

- Indicates that certain roads need widening
- Willing to give guidance where roads and paths need updating and implementation.

ABP further comments:

- Documentation at application stage needs to be clear as to the full extent of works proposed
- Impact on road widening to the south of the proposed development is to be considered,
- Consideration needs to be given to potential impact on rural character when widening roads

4. Surface water management and Flood Risk:

ABP sought further elaboration/discussion on:

- Flood risk assessment needs to be considered, in particular, with relation to water displacement,
- Give consideration to water displacement/discharge within the AA
- Seeks clarification as to when pumping station was installed.

Prospective Applicant's response:

- An NIS has been completed and will be submitted with application,
- The pumping station was installed about ten years ago,
- Will consider risk of flooding in Appropriate Assessment,

Planning Authority's (PA) comments:

- Not concerned with flooding risk to the north of site – Brook Meadows,
- Foul and water supply has capacity,
- Attenuation tanks should be improved to facilitate proposed development should it be granted.

5. Ecology to include consideration of response from Department of Culture, Heritage and the Gaeltacht:

ABP sought further elaboration/discussion on:

- Comments from Department regarding various species,
- Clarity on whether further bat survey will be submitted,
- Removal of hedgerow and impact on species

Prospective Applicant's response:

- Will work out a management plan re: birds etc.

- No invasive species of Japanese Knotweed,
- Will look at extensive renewal of hedgerows and trees.

Planning Authority's (PA) comments:

- Consider impacts to frogs
- Areas around ditches should be increased to allow appropriate separation distances
- The applicant should be careful that ditches and hedgerows do not attract illegal dumping.

ABP further comments

- Need to consider lighting plan in the context of ecology
- Suggest that documentation look at green infrastructure in a more holistic manner

6. Any other matters:

- N/A

Conclusions:

- Issues raised need to be dealt with if/when submitting the application,
- The applicant and PA should liaise with regard the aforementioned issues.

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
August 2019