



An
Bord
Pleanála

Record of Meeting

ABP 305801-19

Case Reference ABP 305801-19 / Description	256 no. Build to Rent apartments and associated site works. Lands at Palmerstown Retail Park, Kennelsfort Road Lower, Palmerstown, Dublin 20		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	11 th December 2019	Start Time	2.30pm
Location	Offices of An Bord Pleanála	End Time	4.00pm
Chairperson	Rachel Kenny	Executive Officer	Sorcha Skelly

Representing An Bord Pleanála:

Rachel Kenny, Director of Planning
Erika Casey, Senior Planning Inspector
Sorcha Skelly, Executive Officer

Representing Prospective Applicant:

Mary McGrath, Randelswood Holdings Ltd.
John Downey, Downey Planning
Eva Bridgeman, Downey Planning
Justin Halpin, Downey Planning & Architecture
Alessandra Minicuci, Downey Planning & Architecture
Cormac O' Brien, AECOM
Michael Dunne, AECOM
Jane McCorkell, Landscape Architect

Representing Planning Authority:
Hazel Craigie – Senior Planner
William Purcell – Senior Engineer (Roads)
Laurence Colleran – Senior Executive Parks Superintendent

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 **26th November, 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 **31st October, 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 and Architectural Approach**
- 2. Residential Amenity**
- 3. Traffic, Access and Pedestrian/Cycle Permeability**
- 4. Drainage**
- 5. Any other matters**

1. Development Strategy and Architectural Approach

ABP Comments

- Noted the planning history of the site and that it was the Applicant's second time to submit plans. New revised plans submitted address many of the issues raised in the previous refusal by the Board.
- The quality and amenity of the open space and in particular, the north facing open space. Noted that sunlight and daylight at Block A seemed very low in a number of the units and in the courtyard.
- Blocks A & C located in very close proximity to the access road to rear. Scope to improve interface and overall quality of the open space provision. Configuration of Block A needs further consideration.
- Noise impacts on residential units near R148.
- Functionality and treatment of public plaza at Kennelsfort Road.

Prospective Applicant's Comments:

- Development redesigned from what was previously refused, concept changed and floor plans and configuration of blocks amended.
- Dual access to development now proposed from Kennelsfort Road and Old Lucan Road.
- Not a large industrial estate at the back of development. Small industrial area with only six small business units. No HGV's.
- Building has been scaled down in proximity to existing housing.
- Light penetration throughout, durable buildings and high quality finishes and materials proposed.
- Public space at back not near main road to address previous concerns raised.
- Coffee shop now proposed opening out onto public plaza.

Planning Authority's Comments:

- Acknowledge the site is constrained.
- Height of buildings a concern in the context of the County Development Plan. Concerns regarding the height, modulation and separation distances between blocks and their monolithic appearance when viewed along the R148.
- Public open space is overshadowed.
- Boundary treatment needs further consideration.
- Finishes and materials and elevational design requires further detail.

2. Residential Amenity

ABP Comments

- The sunlight and daylight assessment and residential amenity of the apartments.
- The amenity of units fronting onto terraces.
- Balconies located off bedrooms as opposed to principle living area.
- The impact of the apartment blocks in terms of overshadowing, daylight and sunlight to properties at Rose View, particularly Block C.
- Noted that it was not just a matter of meeting the quantitative standards set out in the guidelines but overall quality and amenity of open spaces must be considered. This was particularly important having regard to the location context of the site adjacent to the R148.

Prospective Applicant's Comments:

- Noted the development complies with the BRE guidelines.

Planning Authority's Comments:

- Also noted concerns regarding impacts on residential amenity in terms of sunlight and daylight.
- Wind impacts should be considered on the open spaces.

3. Traffic, Access and Pedestrian/Cycle Permeability

ABP Comments:

- Access arrangements were reason for refusal on first application. Only one access point. New access point now planned at back of development onto the Old Lucan Road.
- Concerns regarding adequacy of this access through the existing industrial estate due to lack of footpaths, cycle facilities and public lighting.
- Carparking – very high amount of carparking spaces for build to rent.
- Ensure assumptions underpinning the TIA are robust in light of the Board's previous note.

Prospective Applicant's Comments:

- Public lighting study has been undertaken and it is envisaged that lighting can be implemented.
- Applicant has right of way over new access but the industrial area is in receivership so have no legal right to create a footpath for pedestrians. There are significant legal constraints which cannot currently be addressed.
- Noted it was likely that adjacent industrial lands would come forward for redevelopment in the short term.
- Surveys completed showed very low level of vehicles at back entrance and little HGV movements.
- No objection in principle to reducing car parking provision and this would be examined further.

Planning Authority's Comments:

- Welcome second entrance but concerns about safety and pedestrian and cyclist movements. Pedestrian vulnerability an issue. Also concerns regarding taking in charge and maintenance.
- Traffic pressure issues at existing entrance and a second entrance will be necessary.
- Second entrance is a positive but a footpath for pedestrians at this entrance would be preferable.

ABP Comments

- Noted that this issue was previously raised by the Board and the applicant would have to make the case for the proposed arrangement in planning terms notwithstanding the substandard connection.

4. Drainage**ABP Comments:**

- PA have raised issues in relation to Drainage for discussion. Noted the previous reason for refusal by the Board. Queried update on site investigations carried out regarding stream.

Prospective Applicant's Comments:

- No existing stream, last records date back to 1800's. Surveys did not locate any stream.

- Would liaise further with the Drainage Department regarding their technical comments.

Planning Authority's Comments:

- PA have existing records. There are historic maps for land and field drainage. This will be shared with applicant.

5. Any other matters

ABP Comments:

- Noted procedural requirements of build-to-rent scheme etc. in respect of public notices and draft legal agreements/covenants.
- Waste management arrangements and the need for clarity regarding storage and collection of bins.
- Lack of a childcare facility on site and further justification of same.
- Quality and location of residential support facilities and amenities and whether there was scope to disperse these throughout the development.

Planning Authority's Comments:

- No further comment.

Prospective Applicant's Comments:

- Noted it was preferable that residential amenities are grouped together to create a critical mass.

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 **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

Rachel Kenny
Director of Planning
9th January, 2020