



An
Bord
Pleanála

Record of Meeting ABP-306557-20

Case Reference / Description	233 no. residential units (178 no. houses and 55 no. apartments), creche and associated site works. Lands at Dublin Road, Haggardstown, Dundalk, Co. Louth.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	13 th March, 2020	Start Time	11.30 am
Location	Offices of Louth County Council	End Time	1.00 pm
Chairperson	Tom Rabbette	Senior Executive Officer	Cora Cunningham

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Karen Hamilton, Senior Planning Inspector
Cora Cunningham, Senior Executive Officer

Representing Prospective Applicant:

Ronan Woods, Genesis Planning
Cathal Maguire, MRL Architects
Eamon Larkin, MRL Architects
Gary McArdle, GFM Consultant Engineers
Sean Doherty, Applicant

Representing Planning Authority

Joanna Kelly, Senior Planner
Michael McGrath, SE Engineer – Infrastructure
Ann McCormick, A Planner
Patricia Hughes, SE Planner
Clare O'Hagan, Senior Staff Officer – 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 2nd March, 2020 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 4th February, 2020 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. Interface with the Dublin Road**
- 2. Development Strategy for the site to include inter alia:**
 - **Density**
 - **Height**
 - **Range and type of housing**
 - **Phasing**
 - **Palette of materials**
 - **Pedestrian connectivity and permeability**
 - **Open space provision**
- 3. Surface Water**
- 4. Flooding**
- 5. Traffic and Transport**
- 6. Any other matters**

ABP queried the Phase 2 zoning, have regard to figure allocation against figure in Development Plan and compliance with Phase 2 of the Core Strategy

Prospective applicant confirmed proposed site on brownfield lands and exempt, justification provided in documentation

1. Interface with the Dublin Road

ABP sought further elaboration/discussion on:

- Proposed layout along a regional route into Dundalk
- The previous grant of permission in Earlsfort
- Placemaking and interface with main road
- Encouraging flow of pedestrians, connectivity and permeability
- Layout and positioning of apartments

Prospective Applicant's response:

- Proposed site is located on the now Old Dublin Road
- Previously looked at integration of the site into the surrounding area
- Proposed signature building and larger scale buildings located along road
- Design rationale provided to create transition from existing housing in Earlsfort
- Will respond to comments raise in PA Opinion

Planning Authority's comments:

- Comments set out in PA Opinion
- Support comments of ABP
- Like creation of streetscape

Further ABP comments:

- Improve treatment, have regard to DMURS
- Nature and character of road will change
- Consider turning housing onto road

2. Development Strategy for the site to include inter alia: Density, Height, Range and type of housing, Phasing, Palette of materials, Pedestrian connectivity and permeability, Open space provision

ABP comments:

- Density:
 - Section 247 meetings notes density increase
 - Creche and central open space not included
 - PA states creche and open space should not be removed
 - Note rationale from prospective applicant
 - Calculation should be included which will bring density down
 - Creche size appropriate for number of houses proposed
 - ABP would require higher density
 - 2003 application for proposed site very similar to what is now proposed
 - Some sites need to protect existing amenity and provide higher density moving away
- Height
 - Higher aspect with duplex apartments
 - Higher blocks might not have negative impact
 - Further discussions required with PA
- Range and type of housing
 - Have regard to comments made in PA Opinion in relation to number of 3-bed units

- If density is increased prospective applicant should be cognisant of number of bed units proposed
- Palette of materials
 - Have regard to render proposed on apartments, must be considered in context of building lifecycle and maintenance
- Pedestrian connectivity and permeability
 - Consider flow along Dublin Road and into proposed site
 - Road down centre of proposed development segregates central core
 - 3 roads proposed in very close proximity
 - Reconsider car parking proposed
 - Queried if it was necessary to provide bus route through proposed site
- Open space provision
 - Large and small open space proposed, small open space areas may be considered unusable
 - Overlooking may be considered substandard, housing could be better orientated to overlook open space
 - Usability of open space questioned, open space needs to be well lit and overlooked to function correctly

Prospective Applicant's response:

- Density
 - Proposed site would be considered as an outer suburban location as per the guidelines with lower density applicable
 - Context of the adjacent site has limited the design of the proposed development
 - The guidelines states if the crèche and open space is to serve the wider area they are to be excluded from the gross density
 - Existing residents in Earlsfort will use creche and open space
 - 2 sides of proposed site contain low density
 - Tried to have proposed development sitting comfortably within site and existing context
- Height
 - There is existing road infrastructure in place
 - Density increased from what was previously discussed and approved
 - Don't want to lose quality of development, trying to achieve balance
- Range and type of housing
 - Duplex units were originally 2-bed, considered too big, changed to 3-bed units
- Palette of materials
 - Intend to have brick finishes along road
- Pedestrian connectivity and permeability
 - Futureproofing and provision of bus corridor within the site
 - Have regard to provision of car parking for creche
 - Creation of central core with pedestrian priority
 - Pedestrian priority on road which will be landscaped into open space
 - Proposed to drop off children at creche, park and get bus
- Open space provision
 - Proposed development meeting Development Plan design requirement
 - Walking routes being provided through landscaping, these routes give variety to proposed site

- Public benches being provided in these areas
- Approach taken to include overall site area in the calculation
- Private (communal) open space being provided for apartments
- Prospective applicant wanted to provide open space in different areas
- Gradient difference between proposed site and Ard na Mara, were attempting to link, providing visual link, providing retaining wall with planting, 2 metre at this point but slopes down

Planning Authority's comments:

- Density
 - Zoning relates to current Development Plan which is currently under review, density figures will go up having regard to national policy
 - Have regard to NPF and RSES and the inclusion of Dundalk as a regional growth town
 - PA would expect a minimum density of 35 at this location
- Height
 - No comment
- Range and type of housing
 - Challenges in relation to number of unit types, balance to be struck
- Palette of materials
 - Agree with ABP having regard to location of units and weathering over time
- Pedestrian connectivity and permeability
 - Review in context of Development Plan
- Open space provision
 - Development plan is descriptive and currently under review an allowance lower than 14% will be considered if of high quality
 - Open space is currently quantitative but will require qualitative
 - Lots of residual open space
 - Hierarchy of open space required
 - Proposed development road dominated, open space is fractured
 - Connectivity and permeability could be improved including connections to Ard na Mara, justification to be included in application if connectivity not being provided
 - Have regard to provision of connectivity to 5 a side open space area if being used by wider area

3. Surface Water, Phasing and Flooding

ABP comments:

- Have regard to comments in PA Opinion
- Provision of connections to existing estates
- The inclusion of the same plans and particulars for all documentations including engineering drawings, NIS etc.
- Flow rates to greenfield sites
- Construction Management Plan required
- Flood B zone in centre of proposed site, Flood Risk Assessment does not address
- Irish Coastal Protection Strategy is included on MYPLAN and flooding is illustrated across the site, this must be included in the flooding information.

- Levels are raised on proposed site from those in 2003 application, address the contours of the site in any future application
- Construction Management Plan and NIS should address level changes
- If flooding occurs, integrate into entire development
- Flood Risk Assessment needs more detail

Prospective Applicant's response:

- Can compensate flooding at south end of proposed site
- Topsoil on proposed site, the contours will be detailed
- Existing levels are higher than what maps show
- All the information will be the same throughout.

Planning Authority's comments:

- Complete design required in relation to pipes and connections
- Will the infrastructure work independently in each phase and catchment
- Outfall – top water level of stream
- Flooding identified on the site
- 2 metre level changes identified on proposed site and surrounding area
- Flood Risk Assessment refers to infrastructure in place
- Gully system proposed, element of flooding underground
- No swales required due to existing infrastructure
- Overlay CFRAMS and ICPSS onto topographical maps

5. Traffic and Transport

ABP comments:

- Have regard to DMURS
- Cul de Sacs not acceptable need to address
- Have regard to traffic and transport in relation to open space reduction and possible redesign

Prospective Applicant's response:

- Footpath and cycle lane can be provided in front of proposed development but is issue in relation with it being an objective of Development Plan
- A bus route and stop are provided throughout the site

Planning Authority's comments:

- Reconsider development strategy for proposed site, integration of DMURS and removal of cul-de-sacs
- Gap between end of blueline and bus stop, PA can give consent for this section
- If there are constraints, consider redesign and discuss further with PA
- A bus route will not be required within the site

6. Any other matters

ABP comments:

- Construction Management Plan and NIS to be submitted with application

- Have regard to Irish Water submission, issues with wastewater network, investigate further and discuss with Irish Water
- No section 49 in place, ABP cannot impose condition
- Potential for the PA to include a section 48(2)(c) for the western infrastructure route, ABP have and haven't been imposed, discuss and inform prospective applicant in advance of application to ensure no surprises
- Include any upgrades in redline and letters of consent

Applicants Comments

- PA Opinion references Special Contribution if proposed development granted permission, this relates to Western Infrastructure

Planning Authority's comments:

- Have issues with phasing of units in relation to Part V and mix proposed, clarity and further discussion with PA required
- Part V will be agreed at a later stage but require front loading in Phase 1
- Address phasing in relation to residential amenity and have regard to construction traffic, etc.
- Phasing and catchment areas for flooding also needs to be addressed
- Section 48(2)(c) is in relation to proposed development being a contributor to the Western Infrastructure, will have to consider
- Road Safety Audit – DMURS – amend in relation to pedestrian link, incorporate rather than proposing to include at later stage

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 **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
March, 2020