



An
Bord
Pleanála

Record of Meeting ABP-306598-20

Case Reference / Description	343 no. houses, crèches and associated site works. Cosmona, Loughrea, Co. Galway.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	7 th May 2020	Start Time	14:30 p.m.
Location	Via Microsoft Teams	End Time	16:40 p.m.
Chairperson	Tom Rabbette	Executive Officer	Ciaran Hand

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Stephen Rhys Thomas, Senior Planning Inspector
Ciaran Hand, Executive Officer

Representing Prospective Applicant:

Michael Fogarty, Rocktop
James Corbett, Architect
Stephen Purcell, Future Analytics Consulting

Representing Planning Authority

Alan O'Connell, Senior Executive Planner
Fiona Holland, Senior Engineer – Roads
Jack Houlihan, Executive Engineer – Road
Tom Doherty, Executive Engineer – Water
Anne Dolan, Executive Scientist – Environment
Daiti Flood, Executive Engineer – Housing

Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, the Local Authority (LA) 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 P.A on 5th 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 LA 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 7th 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. Core Strategy, LAP Phasing and NWRA RSES settlement hierarchy**
- 2. Design Strategy - housing mix/typology, layout and urban design, open space hierarchy**
- 3. Drainage - Surface Water Management – Flood Risk Assessment**
- 4. Environmental Impact Assessment**
- 5. Any other matters**

1. Core Strategy, LAP Phasing and NWRA RSES settlement hierarchy

ABP sought further elaboration/discussion on:

- Proposed density of 33.8 units per hectare and the status of the LAP in the context of phasing and the RSES objectives for Loughrea, if any.

Planning Authority's comments:

- The lands are zoned R1 (phase 1 & 2)
- Density could be increased to better utilise serviced land.
- In relation to phase 3-6 of the proposed development, a material contravention of the plan may be triggered as these lands are zoned Phase 2.
- A justification is needed for development that goes beyond phase 2 in addition to an objective (item C) of the development plan when considering proposals on R1 zoned land.

Prospective Applicant's response:

- The Loughrea LAP was initially until 2012 then was extended to 2017 and now extended to 2022, phase 1 & 2 lands are still zoned residential for the purposes of SHD
- The 2016 census shows that there will be a shortfall in housing, therefore, the target of the core strategy is not exceeded by the proposed development
- Loughrea is a key town, phase 1 and 2 can be combined as there is infrastructure in place
- A potential material contravention statement, however, will be examined.

Further ABP comments:

- Clarify if there is a material contravention of the statutory plan proposed and prepare a statement if necessary
- If a 10-year permission is being sought, a strong justification will be required at application stage given, inter alia, that one of the purposes of the SHD process is to 'fast track' the delivery of housing

2. Design Strategy - housing mix/typology, layout and urban design, open space hierarchy

ABP sought further elaboration/discussion on:

- Density and housing mix strategy
- Greater clarity in relation to pedestrian and vehicular connections to the town and the possibility of other potential connection opportunities to the south of the site
- Layout in relation to the open space hierarchy, address aspects such as overlooking of green spaces, blank frontages, long lengths of blank walls, retaining walls
- Proposed large central open space – types of uses, landscape strategy and the rationale for providing a road link through green space
- Proposed buffer zone along the regional road to the north of the site, its proposed use and any other requirements

Planning Authority's response:

- The scheme is reliant on zoned land for recreational and this has been addressed
- More connections would be welcomed and there could be higher density around open spaces
- In terms of the large central open space (zoned OS) changing rooms are permitted, and ancillary parking to the west is on zoned land
- The link road routed through OS zoned land may present an issue
- The proposed buffer zone to the north of the site is reserved for a future widening of the road, a noise assessment will be required at this location

Prospective Applicant's response:

- The design rationale for the housing layout and mix is presented as per the documentation submitted- housing mix contains 50% 2 beds and 50% 3 beds in phase 1, 2 bed houses are terraced, gables are facing onto the street, a necklace of parkland is being created, houses will be double fronted and the private garden at a higher level in order to address open spaces
- Large central open space is tree lined with a trackway around it containing changing rooms, trees will be retained where possible. This will be a lynchpin for the 6 phases of development.
- Phase 1 land is the entrance, phase 2 is the south parkland, phase 3 & 4 are to the east and phases 5 & 6 are to the north beside the primary school
- Home zones are being created and there here will be a linear park element, with planting at the centre. The main route of the scheme will be like an avenue and pedestrian and cyclist connections will link back from east to west
- The shopping centre is an 8-minute walk from the site and 15 minute walk to the town centre
- The road that cuts through OS zoned land could be moved north and be accessible without going through the zoned land

Further ABP comments:

- Housing mix and distribution should be in accordance with section 28 guidelines, in particular open spaces should be well overlooked, and greater exploration of potential pedestrian links should be demonstrated
- An outline of the proposed uses of the large central open space should be provided
- The proposal to route a road through OS zoned land may present issues and alternatives should be explored.
- CGI views and photomontage images would be useful to illustrate how open spaces will be overlooked.
- Proposed 'double fronted' houses need to be examined and documentation produced to support the rationale that passive surveillance will work effectively.
- An explanation of the reason for a proposed buffer zone along the northern portion of the site is required, its purpose and intended use.

3. Drainage - Surface Water Management – Flood Risk Assessment**ABP sought further elaboration/discussion on:**

- The surface water management approach for the site and the relationship with the FRA
- Upsizing of wastewater pipe work and status of the wastewater treatment plant at Loughrea

Planning Authority's response:

- The PA promote SuDS where possible and it is noted that small areas of the site could be prone to pluvial flooding. A flood risk assessment will be needed
- There should be a mix of SuDS and piped surface water management across the site
- Explore connecting into the public infrastructure
- In phase 2, the surface water seems to be omitted with infiltration trenches, this could cause maintenance issues and a sewer in the area would be more effective
- Wastewater sewer rooting along the public road is a concern, a levy contribution may be required for upgrades
- On a point of clarity, wastewater is treated in Loughrea and drinking water is or will be treated in Tuam

Prospective Applicant's response:

- There will be cobble locking paving and minimal soak pits, this will increase the capacity needed for attenuation tanks, but alternative methods are noted

Further ABP comments:

- Clarify the surface water management approach for the site and meet the technical expectations of the PA if possible
- Address the matter of potential prematurity of a planning application (if proceeding) and 3rd party consent in terms of the Irish Water constraints
- An outline of what upgrades are required and who is carrying them out will be needed
- The capacity of the wastewater plant for Loughrea should be clarified
- There is no further information sought at application stage and all of these technical matters should be addressed as far as possible.

4. Environmental Impact Assessment

ABP sought further elaboration/discussion on:

- The requirement of submitting an EIAR given that the site area is 14.8 hectares.

Planning Authority's response:

- Clarify if an EIAR is required and documentation will be reassessed prior to submission.

Prospective Applicant's response:

- It will be clarified if an EIAR is needed.

Further ABP comments:

- None.

5. Any Other Matters

Planning Authority's comments:

- The roads design safety audit is stage 1, a stage 2 road audit is needed
- A shared surface of cobble lock would not be a suitable
- Submit a DMURS statement
- Check the noise impact particularly in relation to the R380

Prospective Applicant's response:

- No further comments

Further ABP comments:

- No further comment

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 [cgsdesignqa@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

Tom Rabbette
Assistant Director of Planning
May, 2020