



An
Bord
Pleanála

Record of Meeting ABP-306773-20

Case Reference / Description	Demolition of existing buildings, construction of 127 no. apartments and associated site works. Lands formerly known as Richmond Cheshire Home, Richmond Park, Monkstown, Co. Dublin.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	15 th May 2020	Start Time	09:30 a.m.
Location	Via Microsoft Teams	End Time	11:15 a.m.
Chairperson	Tom Rabbette	Executive Officer	Ciaran Hand

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Lorraine Dockery, Senior Planning Inspector
Ciaran Hand, Executive Officer

Representing Prospective Applicant

Mary McGrath, Randalswood Construction Limited
John Downey, Downey Planning & Architecture
Eva Bridgeman, Downey Planning & Architecture
Jennifer Mills, Downey Planning & Architecture
Frank Wade, Lohan & Donnelly Consulting Engineers
Maciej Skiba, Downey Planning & Architecture

Representing Prospective Applicant:

Dara Holohan, Planner
Bernard Egan, Drainage
Stephen McDermott, Senior Executive Planner
Marc Campbell, Parks

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 30th 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 2nd March 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. Development Strategy to include layout; height; mix; aspect; open space provision; permeability; childcare provision**
- 2. Residential Amenity**
- 3. Biodiversity**
- 4. Transport and Parking**
- 5. Drainage Matters**
- 6. Any other matters**

1. Development Strategy to include layout; height; mix; aspect; open space provision; permeability; childcare provision

ABP sought further elaboration/discussion on:

- Layout in relation to the boundaries and embankment
- Proposed heights relative to those permitted under extant permission; proposed heights in context of existing pattern of development and existing Development Plan policy
- Relationship between proposed development and possible future development in wider Dalguise lands
- Unit mix (50% x 1 beds and 50% x 2 beds)- PA concerns at lack of larger family units
- Clarification required regarding number of proposed dual aspect units
- Open space provision- quality and usability, daylight/sunlight
- Permeability of this site and relationship with Dalguise site to the west; location of pedestrian entrance to Dalguise lands
- Childcare provision and justification for lack of same

Planning Authority's comments:

- Proposed development is close to the boundaries; excavation will be required
- Removal of embankment at Richmond Park will result in loss of trees and vegetation
- Light into the south-facing apartments at this location is critical
- Examine the unit mix and look to provide more of a variety
- Some units are small- just above minimum standards
- Proposed 54% of dual aspect units is limited, given brownfield nature of the site
- In relation to open space, the southern boundary contains a 6-7 metre wall; concern with regards potential tree removal; analysis of tree growth required
- Concerns regarding quality of the play area in terms of daylight/sunlight
- Ensure pedestrian link joins with that outlined on Dalguise site; queried whether cycle route is possible
- Lack of childcare provision is a concern

Prospective Applicant's response:

- Proposed to remove embankment at southern end of site and replace with green wall
- An additional floor from the previous application is being added; height will be justified at application stage
- In terms of units mix, notes that wider area contains a mix of units including larger houses
- Anticipated that occupants of this development may be downsizers
- In terms of units size, 37% of units are greater than the 10% gross floor area requirement
- Living room windows in block A are triple aspect; south facing windows to these units are secondary aspect; main aspect is east/west
- Open space comprises 4000 sq. metres
- Playground area will have good surveillance and sunlight
- Tree growth will be analysed
- Embankment removal will ensure flat, safe and usable land
- Confirmed that Dalguise site is under different ownership

- A notional proposed link to the Dalguise site will be shown and a cycle route will be examined
- Childcare survey will be provided

Further ABP comments:

- This site is zoned 'Objective A' and there is an extant permission
- It is noted that the site is constrained with a high retaining wall on the southern boundary and a stream on the northern boundary. It is further noted that the site has extant permission; does not have street frontage and existing dwellings in Richmond Park are at a much higher level than subject site
- Submit a height justification study; cross sections will be very important in any application
- A rationale for unit mix is needed; extent of larger properties in general area is acknowledged
- Provide a floor plan drawing clearing specifying aspect of all units
- Ensure open space is of high quality and receives adequate sunlight; submit analysis in this regard
- Address concerns highlighted by PA in relation to suitability of location of proposed pedestrian link with Dalguise lands
- Address why childcare is not being provided and submit details regarding childcare provision in the wider area
- A structural report for the embankment and green wall should be submitted

2. Residential Amenity

ABP sought further elaboration/discussion on:

- Possible impact on existing residential amenities
- Compliance with national guidance for future occupiers

Planning Authority's response:

- There may be a visual impact on houses to the rear
- Overlooking, overshadowing and visual intrusion to the north of the site
- The excavation of the embankment will create difficulties and will not overcome the issues of overbearing and impact
- Impact needs to be considered on residents of Richmond Park and Kenilworth Way

Prospective Applicant's response:

- Will address concerns raised
- The two stand-alone houses opposite the site entrance are located 28 metres and 35 metres away from subject site; 48 degrees to the west of the site with landscaped area separating
- The green wall to south is five metres from Block B; all units at GF have east-west orientation; southerly windows are additional
- Satisfied with amount of daylight/sunlight being received

Further ABP comments:

- Address the issues of possible impact on residential amenities
- Cross-sections/CGIs and visualisation should be submitted

- Detail the relationship to the Dalguise site to the west
- Address amenities for future occupants; compliance with national guidance
- A schedule for floor areas should be submitted; include private open space provision; aspect; floor to ceiling heights;

3. Biodiversity

ABP sought further elaboration/discussion on:

- Report of PA in relation to the matter of biodiversity
- Tree removal, root protection for trees to be retained
- Address potential impacts in application

Planning Authority's response:

- The northern site near the stream contains a heronry which are not listed
- There are also red listed species (grey wagtail) noted along the stream
- Possibility of bats in southern embankment
- A detailed analysis will be required
- Surveys need to be up to date

Prospective Applicant's response:

- A detailed ecological analysis will be submitted
- Trees at the entrance of the site will be assessed

Further ABP comments:

- Address all matters raised by the PA; liaise with PA if necessary
- Submit up-to-date surveys

4. Transport and Parking

ABP sought further elaboration/discussion on:

- Car parking figures and justification for extent of parking proposed
- Matters raised in PA report, as outlined in section 1.3(i)

Planning Authority's response:

- Reduced parking is acceptable
- Examine the designation of specific car parking spaces

Prospective Applicant's response:

- Car parking is one space per unit, ten visitor and five disabled
- EV spaces are also being provided for
- A TTA will be submitted
- The relocation of bicycle parking will be examined

Further ABP comments:

- Justify the car parking provision
- Liaise with PA in relation to other matters raised in their Opinion

5. Drainage Matters

ABP sought further elaboration/discussion on:

- Irish Water submission
- Matters raised in section 1.3(ii) of PA Opinion
- Flood Risk Assessment

Planning Authority's response:

- Need to relocate pedestrian access away from the stream
- Explain how surface water is addressed
- Provide necessary information in relation to flood risk
- Show levels, drawings and presentations

Prospective Applicant's response:

- Lands in the floodzone to the north are outside of ownership
- All outstanding issues in relation to wastewater and flood risk will be examined

Further ABP comments:

- Address any outstanding issues
- There is no further information sought at application stage; liaise with PA prior to submission of application

8. Any other matters

Planning Authority's comments:

- Cycle parking needs to be accessible
- A hydrologist may be required in relation to ground water and excavation

Prospective Applicant's response:

- Part V will be addressed

Further ABP comments:

- Seek to address concerns raised previously by third parties on this site
- Address issue of potential subsidence
- Outline cycle parking
- Provide Part V information; building lifecycle report

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