



An
Bord
Pleanála

Record of Meeting ABP-307157-20

Case Reference / Description	153 no. residential units (53 no. houses, 100 no. apartments), childcare facility and associated site works. Blackglen Road, Sandyford, Dublin 18.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	14 th July 2020	Start Time	14:30 p.m.
Location	Via Microsoft Teams	End Time	16:10 p.m.
Chairperson	Tom Rabbette	Executive Officer	Ciaran Hand

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Rachel Gleave O' Connor, Planning Inspector
Ciaran Hand, Executive Officer

Representing Prospective Applicant:

David Brown, Applicant
Mark Brown, Applicant
Robin Jardine, Architect
John Fleming, Architect
Declan Brassil, Planning Consultant
Christy O'Sullivan, Transport
John Paul Rooney, Civils
Ciaran McGee, Civils
Andrew Bunbury, Landscape Architect
Hennie Kallmeyer, Senior Planner

Representing Planning Authority

Ger Ryan, Senior Planner
Shane Sheehy, Senior Executive Planner
Elaine Carroll, Drainage

Lorraine O'Hara, Parks
Claire Casey, Roads
Miguel Sarabia, Case Planner

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 16th June 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 11th May 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. Road Improvement Scheme – Blackglen Road**
- 2. Density**
- 3. Design, site layout and street arrangement**
- 4. Part V housing**
- 5. Quality of proposed units (outlook, layout of duplex units, communal amenity space)**
- 6. Impact upon amenity of existing residents (separation distances)**
- 7. Cycle storage**
- 8. Drainage**
- 9. Any Other Matters.**

1. Road Improvement Scheme – Blackglen Road

ABP sought further elaboration/discussion on:

- The previous reason for refusal related to prematurity pending the Road Improvement Scheme on Blackglen Road. Currently unsafe for pedestrians / cyclists.
- Can safe pedestrian and cyclist access / egress to the site be demonstrated.

Planning Authority's comments:

- The notice to treat should be decided in September and tenders will issue after that.
- The process will go through the corporate steering group and until all approvals are in place, there is no certainty around delivery or timeframes.
- If all approvals are achieved then tenders will issue and construction will commence.
- No certainty of when construction will start at this time.
- There is no capacity issue regarding the Blackglen Road.
- Safety is the key issue in relation pedestrian and cycle movements to and from the site.
- Pedestrians must be prioritised.
- The proposed development cannot be car dependent.

Prospective Applicant's response:

- Notice to treat is welcome.
- The site is in a metropolitan area.
- It should be viewed in the context of being a strategic area.
- Phasing and the occupation of units could be linked to the timeline of construction.
- Occupation of units may not happen until late 2022 or early 2023.

Further ABP comments:

- The application needs to provide certainty regarding the timeframe and delivery of the Blackglen Road Improvement Scheme
- Documents should show safe pedestrian and cycle access to the site.
- It would appear that there is no certainty regarding delivery of the Road Improvement Scheme at this time and therefore safe pedestrian and cycle access is not yet possible.

2. Density

ABP sought further elaboration/discussion on:

- Proposed density of 41.1 du/hectares. Query the appropriateness of this density level in light of national policy and the sites location.
- The context of previous proposals for the site demonstrating higher density levels was noted.

Planning Authority's response:

- This is the lower end of the density spectrum.

Prospective Applicant's response:

- Aware of the local and national guidelines regarding density.
- This is a transitional area with low density housing in the surrounding area.
- The proposal incorporates green areas.

- A balance has to be found between the metropolitan area and the physical content of the site.
- There is a wide housing mix proposed.
- The proposed density level is actually high in the context of the area.
- The area contains a number of single-family units.

Further ABP comments:

- The application should show that the density level is optimised and ensure the most efficient use of land.
- Previous proposals for the site had higher density levels and where it was not refused by the board on the basis of density. Since that time, national policies have changed to promote higher densities in the appropriate locations.
- Explain why density has been reduced from the previous application on the site.
- The justification of density should be informed by the location, it would appear that the proposed site is a short cycle to the Luas.

3. Design, site layout and street arrangement

ABP sought further elaboration/discussion on:

- Note that the design and street arrangement is largely unchanged from the 2007 scheme.
- How has the design been influenced by more recent planning policy and guidance, including DMURS, particularly in relation to street arrangement and hierarchy.
- Where are the home zones and cycle routes referenced in the documents?

Planning Authority's response:

- The layout has legibility.
- Concern that long street/roads will result in increased speed.
- Examine alternatives to encourage reduced speed and ensure they are designed in at planning stage, there should be no need for retrofitting speed reducing measures.
- Show the relationship of the cul-de-sac and the road to the northern part of the scheme.
- The cul-de-sacs up to the boundary is welcomed, it encourages/provide for future connections.
- The width of 5.5 metres is needed on roads to comply with DMURS.
- Ensure that off-street parking and footpaths are in line with DMURS requirements.

Prospective Applicant's response:

- Due to the topography of the site (i.e. change in ground levels) a spine road is needed from Blackglen Road to Woodview.
- There is permeability shown with the inclusion of cul-de-sacs to boundary edge for future potential connections.
- The final design will comply with DMURS
- There are pedestrian and cyclist linkages to Woodview through the site.
- Permeability to adjoining lands in the future is possible.

Further ABP comments:

- In accordance with DMURS the number of cul-de-sacs should be limited.

- If future connections are to be shown, there should be some consideration/justification of likely need.
- The number of future connections currently shown appears speculative.
- The application should explain the likely future development of surrounding lands that connections are shown to.
- Ensure DMURS compliance at design stage.
- Explain/justify if the topography of the site is dictating/informing the layout and design.

4. Part V housing

ABP sought further elaboration/discussion on:

- Part V housing located in block C to the south and rear of the site.
- Query the location of part V housing and whether it would be indistinguishable from private apartment blocks.
- The part V housing fronts onto a car parking area.
- Does the green space around the part V block act as an attenuation and drainage area?

Planning Authority's response:

- Concerned with the location and quality of the proposed part V being provided.

Prospective Applicant's response:

- The part V apartments in block C are identical to other apartments in the scheme.
- All units have car parking nearby.
- 5 units in block C look out onto open space.
- The green space is consistent with blocks A and B.
- Open space provision will be examined further to ensure it is usable despite drainage function.
- Surface water outfall does go south east to the stream.
- There is a basin located there with a 400 mm depth for a 1 in 100-year scheme.

Further ABP comments:

- The part V letter and statement of consistency contain conflicting part V figures.
- There may be a concern at application stage that the quality of the open space for the part V housing is different than what is being provided for in other blocks.
- Outline the usability of the open space.
- Explain the discharge route across the site and whether this channels through the part V green space to the stream.
- The application should seek to demonstrate that the part V housing is indistinguishable from other residential blocks.

5. Quality of proposed units (outlook, layout of duplex units, communal amenity space)

ABP sought further elaboration/discussion on:

- The outlook from apartments with a window looking directly onto the balcony area for another apartment, repeated across floors and in all blocks.
- The adequacy of the design of duplex units to reduce disturbance between neighbours.
- Duplexes with the living space located above a neighbouring unit's bedroom space.

- Duplexes with balconies located above the bedrooms for a neighbouring unit.

Planning Authority's response:

- Quality of the proposed units is important.
- Policies to prevent overlooking and ensure adequate separation distances should be adhered to.

Prospective Applicant's response:

- There will be no impact on quality.
- Regulations will apply.
- Privacy regarding overlooking will be examined.

Further ABP comments:

- Ensure that documents describe adequate separation and prevention of overlooking between apartments.
- Documents should explain how the design and layout of duplexes will reduce potential disturbance.

6. Impact upon amenity of existing residents (separation distances)

ABP sought further elaboration/discussion on:

- Separation distances to existing neighbouring dwellings.
- Tree removal at the southern and eastern boundaries which appears to be outside the redline boundary for the site.

Planning Authority's response:

- On the northern boundary the separation distance to a dwelling house is below the 22 metres.
- Detail the location of windows in houses near to the site boundary.

Prospective Applicant's response:

- The layout has been changed to allow a distance of 22 metres to the dwelling house on the northern boundary.
- It is not the intention to remove trees outside of the site boundary and details will be reviewed.

Further ABP comments:

- Show separation distances with the location of windows identified.
- Ensure that the tree survey is up-to-date and includes any trees within the site as well as to boundaries.
- The removal of trees outside of the redline boundary requires examination and consent from relevant landowners.

7. Cycle storage

ABP sought further elaboration/discussion on:

- Types of bicycle storage proposed.

- Query the location of bicycle storage and allocation to residents.
- The number and quality of block C bicycle spaces.

Planning Authority's response:

- Housing occupants should be able to get to bicycle storage without going through the living spaces.
- Have regard to DLRCC standards and national standards.

Prospective Applicant's response:

- Bicycle storage is planned around DLRCC standards.
- There is allocated bicycle parking for all blocks.
- Bicycle storage is located on the ground floor of apartment blocks and in separate storage sheds close to entrances.
- There is 157 long-term bicycle spaces and 85 short-term spaces.

Further ABP comments:

- Provide a visual and written explanation of cycle storage proposals.

8. Drainage

ABP sought further elaboration/discussion on:

- Any outstanding drainage issues.

Planning Authority's response:

- Discharge and attenuation figures are not as expected.
- Basins are acceptable however their locations are a concern.
- Areas are difficult to access and maintain.
- The south of the site is adjacent to a stream that floods.
- The discharge point on 1 metre is below the flood levels.
- There is a large attenuation volume in the private permeable paving.
- Flooding is a concern for this site.

Prospective Applicant's response:

- Discharge and attenuation will be examined.
- Drainage calculations will be provided.
- Basins are shallow and close to the road.
- Each development plot is dealing separately with attenuation and a 1 in a 100-year event.
- Public open space and permeable paving will deal with run off.

Further ABP comments:

- Address discharge and attenuation matters raised.
- Outline and justify the drainage approach.

9. Any Other Matters

ABP comments:

- The Statement of Consistency mentions that there is a stream within the site boundary, but the AA Screening and Ecological Report state the stream is outside of the site boundary.
- Location of the stream requires clarification and consideration is required of potential hydrological links to sensitive areas during construction.
- On page 11 of the statement of consistency the paragraph on flood risk is not completed.
- Page 43 of the statement of consistency should be checked in relation to the description of the 2007 scheme.

Planning Authority's comments:

- Page 7 of the Engineering Report says permeable paving will allow limited infiltration and this is a concern.
- Clarify the drawings regarding tree lines at the boundary.
- Have regard to a historical cottage that is close to the boundary.

Prospective Applicant's response:

- The stream runs along the boundary but is not inside it.
- The red-line boundary is close to the riverbank.
- There will be no reliance on infiltration.
- A surface water management strategy will be submitted.

Conclusions

- 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, 2020