



Case Reference / Description	Preservation of Auburn House as 1 no. residential dwelling, conversion of existing stables of Auburn House to accommodate 4 no. dwellings, construction of 412 no. residential units (110 no. houses, 307 no. apartments), creche and associated site works. Lands at Auburn House (a protected structure), Little Auburn and Streamstown, Off Malahide Road and Carey's Lane, Back Road and Kinsealy Lane, Malahide, Co. Dublin.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	17 th November 2020	Start Time	2.30 pm
Location	Remotely via Microsoft Teams	End Time	4.45 pm
Chairperson	Tom Rabbette	Executive Officer	Helen Keane

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Conor McGrath, Senior Planning Inspector
Helen Keane, Executive Officer

Representing Prospective Applicant:

Jim Kenny, Kinwest Limited
Susan McClafferty, Downey Planning
Donal Duffy, Downey Planning
John Downey, Downey Planning
Michael Crowe, Conway Crowe Kelly Architects
Maire Gray, Conway Crowe Kelly Architects
Kieran Murray, Conway Crowe Kelly Architects
Emma Spierin, Conway Crowe Kelly Architects
Mark Duignan, Waterman Moylan Consulting Engineers

John Tierney, Consultant
Linda Maher, The Big Space Landscape Architects
Peter Cuthbert, Horticulturist
Andy Worsnopp, The Tree File
David Averill, Sheehan & Barry Architects

Representing Planning Authority

Sean Walsh, Senior Executive Planner
Kathy Tuck, Area Planner Howth/Malahide
Helena Bergin, Senior Executive Architectural Conservation Officer
Fionnuala May, County Architect
Niall Thornton, Executive Engineer
Niall McKiernan, Executive Engineer
Mark Finnegan, 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 once the Opinion has issued,
- ABP received a submission from the PA on 12th August 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 16th July 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. Masterplan / Development Strategy vis Development Plan objectives
2. Protected Structure and its Curtilage – including the vista and landscape setting of Auburn House, and treatment of the walled garden
3. Woodland management and biodiversity
4. Drainage – Surface water including SUDS measures and public open space
 - Flood Risk Assessment
 - Foul drainage works
5. Residential amenity for apartments – daylighting, aspect
6. Transport and access
7. Any Other Matters

1. Masterplan / Development Strategy vis Development Plan objectives

ABP Comments:

- Note that the PA is generally supportive of the development of the lands
- Elaborate on status of the Streamstown masterplan
- Material Contravention statement provided by prospective applicant refers to building height and density.
- Prospective applicant should ensure that all relevant matters are addressed in the Material Contravention statement at application stage

Planning Authority's Comments:

- No engagement with prospective applicant in preparing Streamstown masterplan
- It is yet to be clarified how masterplan would be adopted
- No comments to make on the submitted masterplan document

Prospective Applicant's Comments:

- Low density residential development is appropriate for area
- Issues of density and height are interlinked
- The objective to protect and preserve trees is key to design
- Aim to preserve treelined Malahide road to the south
- Many trees on proposed development site are approaching end of life
- It is an objective to provide a pedestrian and cycle route through the lands
- The lands are subject to detailed flood risk assessment

2. Protected Structure and its Curtilage – including the vista and landscape setting of Auburn House, and treatment of the walled garden

ABP Comments:

- Provide further information on the design approach and the preservation of landscape character, along the Dublin Road frontage, including planting
- Additional detail required on relationship of existing avenue with the proposed development and analysis of the visual impact thereon
- Provide further detail on proposed use of the existing entrance avenue as a vehicular / pedestrian access
- Provide further detail on views from Auburn House, which are to be protected
- Provide an agreed, consistent definition of the vista or justify any proposed alternative approach to specific objective of development plan
- Clarify how Auburn House will be treated in the future with regards to the landholding, long-term management of the property, relationship with the rear and proposed stable apartments
- Improved coordination needed between reports, which may be achieved through any EIAR to be submitted at application stage
- Address design mitigation features and treatment of walled garden

Planning Authority's Comments:

- It is a development plan objective to protect the treeline along the Dublin Road. The existing cover of trees is not dense
- Proposed height not acceptable along the eastern end of the site. The prospective applicants were directed to other areas of the lands appropriate for higher scale development
- The scheme will result in the removal of 320 trees
- Provide a rationale for proposed location of the pump station and impact on trees
- Concerns arise regarding courtyard designs encroaching on vistas of the house
- Concern regarding orientation and scale development and the protection of vistas from the paddock
- Development plan refers to the retention of visual corridors to and from Auburn House
- Concern arise regarding type of development proposed in the walled garden, including the proposed breach of the walls
- There is potential for development near walled garden to be more sensitive, including use of this area as a playground
- Concern regarding tree retention and quantum of open space

Prospective Applicant's Comments:

- A small number of trees will be removed to facilitate the new entrance road. The proposed development has simple entrance at a gap through trees
- Proposed development is generally set back 40 metres or more from the Dublin road
- Trees are the main attribute of site and the high tree canopy contributes to quality of the route. The understorey currently screens the site.
- A woodland management plan is in place and extensive replacement planting is proposed. Existing planting is at / near end of life.
- The existing entrance avenue is well screened on the right and the proposed development will mostly not be visible from the avenue
- Section drawings identify existing trees (including tree reference no.'s)
- Further visual analysis along the entrance avenue will be provided
- Original entrance will be retained for pedestrian use and protection of amenity
- Auburn House will be an essential feature on approach to the proposed development
- The setting of Auburn House is a key consideration. This house sits on a small scale estate and views from the house do not comprise a formal axial vista.
- The Development plan is not specific regarding the vista and further clarity on the landscape setting will be provided at application stage
- This is an opportunity to reinstate a managed landscape setting for the house.
- Development within the Walled Garden occurs generally in the more open, southern part of the area
- Parking in the area near walled garden is generally under Duplex block
- Further information on conservational methodology will be provided
- Walls, follies and other existing structures are preserved.
- A more detailed conservation methodology will accompany the application.
- The relationship with adjoining housing in Clareville will be addressed

- Will consider the concerns of the PA regarding tree retention and the quantum of open space

3. Woodland management and biodiversity

ABP Comments:

- Woodland management plan needs to be further developed at application stage with more detail, specific actions and mechanisms included
- Clarify the extent of tree loss and provide rationale for tree removal
- Identify the distinction between public and private space regarding trees at application stage
- Prospective applicant should consider wider ecological significance of trees regardless of their current life span / condition
- Potential uses of the site as ex-situ foraging site
- Coordination between reports required

Planning Authority's Comments:

- Significant proportion of trees require felling on proposed development site
- Apartment Block 7 occurs within a woodland area
- Concern regarding boundary trees incorporated into private open spaces

Prospective Applicant's Comments:

- More detail will be provided on woodland management plan especially with regards to future use and occupation
- Will provide rationale for removal of trees at application stage
- Note that trees along the boundary of the Back field lie within Abington while management access is provided to the rear of houses backing onto the north-eastern boundary

4. Drainage – Surface water including SUDS measures and public open space

- **Flood Risk Assessment**
- **Foul drainage works**

ABP Comments:

- Prospective applicant to clarify treatment of SUDS and use of front field as detention basin
- Address the function of this open space
- Review the submitted flood risk assessment before application stage
- Provide clarity on required foul drainage works and extent, vis the red line boundary
- Evidence of consent to carry out all required works will be provided
- Refer application to IAA in respect of possible bird impacts

Planning Authority's Comments:

- Query regarding provision of a headwall within the detention basin

- Concern regarding flood risk on site of proposed development
- Concern regarding appropriate mitigation and basement level carpark
- Prospective applicant consulted with PA on flood risk assessment
- Co. Co. are in consultation with IAA on potential bird hazard arising from SUDS measures in its administrative area.

Prospective Applicant's Comments:

- A flat area for a dry detention basin is proposed, to be described appropriately
- Headwall is not proposed
- Further information will be provided at application stage on flood risk assessment and further discussions are underway with Fingal Co. Co.
- Consent letter will be provided at application stage
- All external works are in public road
- Will consult with Irish Aviation Authority

5. Residential amenity for apartments – daylighting, aspect

ABP Comments:

- Provide daylighting review of the units
- Provide rationale for design approach
- Provide evidence of compliance with dual aspect provision apartments
- Provide clarity on public / private communal spaces

Planning Authority's Comments:

- Full assessment is required regarding dual aspect

Prospective Applicant's Comments:

- Some issues have been identified in the analysis of apartment daylighting which will be addressed at application stage
- Will show compliance regarding dual aspect at application stage

6. Transport and access

ABP Comments:

- Clarify issues with planning authority on agreed approach to transport assessment
- Review internal layout and surfacing treatment
- Provide detail on permeability connectivity to the adjoining lands

Planning Authority's Comments:

- Preferable to retain existing avenue as pedestrian route, detail to be agreed to include public lighting etc.

7. Any other matters

ABP Comments:

- Clarify treatment of duplex units on southeast side

Prospective Applicant's Comments:

- All access points to ground floor apartments are on the street side
- All duplex units have own patio, accessed from the podium courtyard

- **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 [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
December, 2020