



An
Bord
Pleanála

Record of Meeting ABP-308497-20

Case Reference / Description	Lands to the west of the entrance to Howth Castle, Howth Road, Howth, Dublin 13. 162 no. apartments and associated site works.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	13 th January 2021	Start Time	2:30 pm
Location	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
Irené McCormack, Planning Inspector
Helen Keane, Executive Officer

Representing Planning Authority

Carol Hurley, Executive Planner
Sean Walsh, Senior Executive Planner
Darragh Sheedy, Executive Engineer
Niall Thornton, Engineer
Fionnuala May, County Architect
Helena Bergin, Senior Executive Architectural Conservation Superintendent
Mark Finnegan, Parks and Green Infrastructure

Representing Prospective Applicant:

Paula Galvin, McCutcheon Halley Planning
Carlos Lara Gonzalez, McCutcheon Halley Planning
Gerry Murphy, MCA Architects
Stephen O'Connor, Barrett Mahony Consulting Engineers
Melanie Sharkey, Bernard Seymour Landscape Architecture

Richard Butler, Modelworks
David Caffrey, Glenveigh (Prospective Applicant)
Kevin Culhane, Mitchell & Associates

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:

- ABP received a submission from the PA on 3rd December 2020 providing the records of consultations held pursuant to section 247 of the Planning and Development Act, 2000 as amended 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 23rd October 2020 formally requesting pre-application consultations with ABP. The prospective applicant advised of the need to comply with the definition of SHD as set out in the (Housing) and Residential Tenancies Act of 2016, in relation to thresholds of development. The representatives of ABP advised that the Inspector dealing with the pre-application consultation request would be different to the Inspector who would deal with the application when it was submitted. Recording of the meeting is prohibited.

Agenda

1. Development Strategy – Compliance with the Core Strategy including issues relating to zoning, density, scale and height, landscape setting, landscaping, provision of public open space
2. Conservation – Built Heritage and Archaeology
3. Access and Transportation – Issues raised by the PA
4. Residential Amenity – Sunlight/Daylight/Overshadowing Analysis, Overlooking and Noise Mitigation
5. Any Other Matters

1. Development Strategy – Compliance with the Core Strategy including issues relating to zoning, density, scale and height, landscape setting, landscaping, provision of public open space

ABP Comments:

- Prospective applicant to outline design rationale

Planning Authority's Comments:

- Generally supportive of increased density but in the context of this sensitive site location the proposed density is not suitable on the approach to Howth
- Concern regarding the building height, scale and mass and the character of the area including the adjoining suburban dwellings to the west and the entrance to Howth Castle to the immediate east which is a protected structure. Concern also expressed regarding the impact on the view of Howth Hill to the south (rear) of the site with the high amenity area and Howth SAAO
- Boundary of proposed development is up against a high amenity zoning
- Proposed development must be mindful of established character of area and transition accordingly
- Site requires sensitive approach. This is a highly sensitive landscape requiring special emphasis on landscape features
- Lower scale typology would be more acceptable due to the location of proposed development
- PA argue that the Techrete site is not an appropriate comparison as this site is zoned Town Centre with a specific objective for a landmark gateway building and such provision is not supported on this site
- No provision made for the required 10% open space provision as set out in the Development Plan
- Concerns raised with respect to the usability and public access to the public open space proposed enclosed behind the roadside boundary wall
- PA cannot accept in lieu of 10% requirement
- Concerns expressed regarding the removal of the main ecological feature on the site. Preference to retain ecological features and enhance where required, in particular, any gaps along the eastern site boundary.
- Ensure clear demarcation between public open space and communal
- PA advise that they are willing to engage further with the applicant regarding provision of public open space

Prospective Applicant's comments

- Proposed site has dual zoning and the HA lands are not requirement to meet standards. A clear overlay of the site zoning will be submitted
- Applicant advised that the density is consistent with the permitted development and that residentially zoned land is low in the area and there is a need to drive the efficiency of available lands
- The design is reflective of the emerging context at this location and the scheme has evolved with regard to site context, topography, views and residential amenity, and the design of the blocks has been articulated to reduce their scale and presents a four storeys to the shoulder fronting Howth Road and Block C

relocated in an westerly direction in order to increase separation distance from the Castle gate (PS)

- Comments of County Architect noted and welcomed - 'place in time', 'creating a new context'
- The applicant notes the site is heavily screened and the design intention is to retain landscaping features where possible and reinforce where necessary, in particular, along the eastern site boundary
- Planning authority had expressed concern regarding the proximity of boundary trees, applicant advised that plans were adjusted to reduce the impact
- Applicant argues that the scale of proposed development is removed from the Protected Structures and the original parkland setting and that there is a balancing act required in terms of the sustainability of the scheme architectural heritage protection
- The proposed scale is conscious of urban edge location and design represents a high quality, robust design approach in collaboration with relevant professionals and the intention is not to screen off the development
- It is set out that any development on the site will block views of the headland to the south
- A sufficient range of viewpoints have been established including from the Castle
- In relation to the scale of the development, the applicant noted that there are developments of a similar scale and mass in the area, there are existing apartment developments elsewhere along this road corridor reflecting a continuing pattern of change in area
- Proposed development is in proximity to protected structures but impacts are very limited
- The protected view through the gateway is not impacted upon
- Proposed development is not undermining protected structures
- Hedgerow on southern boundary is not historic
- Compensation planting will be carried out
- Proposed development site delivers green infrastructure
- No fencing currently proposed between the site and lands to the south
- Howth Peninsula has large amount of public open space accessible to the future residents
- Redline to the south is determined by the landscaping strategy
- Seeking further discussions with the planning authority regarding provision of public open space

2. Conservation – Built Heritage and Archaeology

Planning Authority's Comments:

- PA advised that it is the scale of the development and not the design approach that will have a negative impact
- Conservation areas cannot take landscape and green infrastructure into account in assessment
- Negative impact on tourist value of Howth village

Prospective Applicant's Comments:

- The ACA is confined to the east of the site and the development is sufficiently removed from the Protected Structures
- AIA will be submitted

3. Access and Transportation – Issues raised by the PA**ABP Comments:**

- Planning Authority to clarify issues raised in submitted report, constraints at Sutton Cross, and car parking including visitor parking
- Conflict on submitted documents regarding site layout
- Coordinate and ensure no conflicts in documentation at application stage

Planning Authority's Comments:

- Consider potential impacts on traffic at Sutton Cross
- Acknowledge prospective applicant cannot provide solution to Sutton Cross issues
- Request that Sutton Cross is included in Traffic and Transport Assessment
- Further parking required, 0.7 parking spaces per unit not sufficient, consider 1–3-bedroom apartments
- Visitor parking is desirable
- Have consideration for access issues regarding parking and security

Prospective Applicant's comments

- Have had consultations with the planning authority and are not aware of any outstanding issues that need to be addressed
- May consider visitor parking at application stage
- Proposed development is 500 metres from Howth village with excellent access to cycling routes and public transport including Howth DART station
- Proposed development site is very accessible
- No surface parking is proposed

4. Residential Amenity – Sunlight/Daylight/Overshadowing Analysis, Overlooking and Noise Mitigation`**Planning Authority's Comments:**

- Proposed development is on a greenfield site
- Prospective applicant to ensure established residential amenity is protected

Prospective Applicant's comments

- Cognisant of single storey nature of linear development adjacent to the proposed development
- Level of impact on adjoining property or the west is imperceptible

- Design adheres to all design standards in terms of sunlight/daylight, dual aspect etc. Reports to be submitted.
- The proposed development is designed to keep block as far as possible from the houses to the west of the site additional landscaping screening proposed
- Application will be accompanied by Environmental Impact Assessment Report including noise assessment

5. Any Other Matters

ABP Comments:

- Provide photomontages of Techrete site if possible, may assist assessment at application stage

Planning Authority's Comments:

- Proposed approach to Sustainable Urban Drainage System measures is acceptable
- Flood Risk Assessment provided is acceptable, with little/no obvious flood risk
- Fire tender access should be contained in residential zoning
- Consider capacity of childcare services in area to take additional children

Prospective Applicant's comments

- A number of Sustainable Urban Drainage System measures are provided
- FRA will address potential for surface water blockages
- Sought legal advice on fire tender access and was advised that it was acceptable in the high amenity area as it was not a structure
- Childcare report reliant on Tusla reports for data on childcare facilities in the area. Report will address available capacity in the area.
- Will provide photomontages of Techrete site if possible at application stage

- **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 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
January, 2021