



An  
Bord  
Pleanála

## Record of Meeting ABP-308537-20

<b>Case Reference / Description</b>	Demolition of existing structures on site, construction of 161 no. Build to Rent apartments and associated site works. Redforge Road, Blackpool, Cork.		
<b>Case Type</b>	Section 5 Pre-Application Consultation Request		
<b>Date:</b>	22 <sup>nd</sup> February 2021	<b>Start Time</b>	10:00 am
<b>Location</b>	Remotely via Microsoft Teams	<b>End Time</b>	11:30 am
<b>Chairperson</b>	Tom Rabbette	<b>Executive Officer</b>	Helen Keane

### Representing An Bord Pleanála:

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

### Representing Planning Authority

Cathy Beecher, Senior Executive Engineer, Transportation
Fiona Redmond, Senior Planner
Martina Foley, Executive Planner
Tony Duggan, City Architect
Valerie Fenton, Senior Executive Engineer, Roads

### Representing Prospective Applicant:

Padraig Kelleher, Bellmount Developments Ltd
Paul Butler, Butler Cammoranesi Architects
Cathal O'Meara, Cathal O'Meara Landscape Architect
Tom Halley, McCutcheon Halley
Cora Savage, McCutcheon Halley

## **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 25<sup>th</sup> November 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 29<sup>th</sup> 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 Principle
2. Design / Height Strategy
3. Residential Amenity, incl. Climate & Daylighting
4. Transportation
5. Public realm
6. Any Other Matters

## **1. Development Principle**

### **ABP Comments:**

- Planning authority to confirm their opinion of the mix of uses proposed on this District Centre site.
- Statement of Consistency does not address current Blackpool Local Area Plan.
- Regard should be had to the provisions of the Local Area Plan at application stage and courts interpretation of development plan provisions.
- Give due consideration to any potential Material Contravention issues, particularly regarding building heights, dwelling mix and private open space.

### **Planning Authority's Comments:**

- The proposed mix of uses is acceptable in principle.
- North Blackpool Local Area Plan is currently in place until September 2021

### **Prospective Applicant's Comments:**

- Planning and Design Statement addresses the Local Area Plan.
- Prospective applicant intends to lodge application for proposed development before expiry of the LAP in September 2021.

## **2. Design / Height Strategy**

### **ABP Comments:**

- Provide rationale and justification for design proposal at application stage.
- Provide justification for proposed height on this site – why this height on this site at this location.

### **Planning Authority's Comments:**

- City Development Plan is currently under review, with intention for draft display in June 2021.
- A Building Height / Tall Buildings Study of the city is underway which will inform the development plan and identify sites for increased height.
- Local Area Plan only allows up to 5-storeys in height.
- City Development Plan states that higher buildings can be considered when there is existing or programmed public transport.
- Further information is required on the programming of transport infrastructure at application stage, including the rail station.
- Proposed development site is a residual site on a minor road in terms of urban design. It is not a strategic or landmark site.
- A landmark site would traditionally accommodate a civic building or a church
- The proposed building is well-designed, but the context of the site needs to be considered.
- The current context may not justify this proposal but this context may change with new transport infrastructure.

### **Prospective Applicant's Comments:**

- Proposed scheme is mindful of the LAP height strategy.
- Blackpool is an important district centre, proximate to the city centre.

- Proposed development site is adjoining proposed Blackpool station and is served by frequent bus routes.
- Area has suffered from a decline in its industrial heritage and the development can perform a function of urban repair.
- Proposed development can be a marker at the entrance to the city.
- Various design and massing options were considered.
- Blackpool area has the ability to accommodate change and development of Kilbarry railway station reflects this.

### **3. Residential Amenity, incl. Climate & Daylighting**

#### **ABP Comments:**

- Provide clarity in terms of standards being applied.
- Further information is required on the methodology and target daylight standards used.
- Although there is some flexibility in the guidelines, a review may be required on units facing south towards the multi-storey carpark as a number of these units are significantly below target values.
- Further analysis of dwellings units on additional floors is required in order to provide the full picture, including some of the west facing units.
- Address specific planning policy requirement 7 (SPPR 7) in more detail in terms of residential facilities for BTR schemes.

#### **Planning Authority's Comments:**

- There is no update on redevelopment of cottages to the north of the proposed development.
- Comments are provided in the Planning Authority report on residential amenity.

#### **Prospective Applicant's Comments:**

- Sunlight/Daylight Assessment will be updated and finalised for application stage.
- Cottages to the north of the scheme are sensitive receptor but proposed development does not have adverse impacts on these cottages for the most part.
- The cottages are currently vacant and do not have high levels of daylight / sunlight currently.
- Will be carrying out a micro climatic assessment prior to lodging an application.
- Ground floor of proposed development is not residential.
- Will look further into units facing south towards the multi-storey carpark and the daylight target values.

### **4. Transportation**

#### **ABP Comments:**

- What is the status of public transport improvements in this area?
- Mobility Management Plan needs to be specific to this development. It should reference specific connections and identify specific modal targets.
- In arguing for increased height on the site under the Building Height Guidelines, a distinction should be made between existing and future high-capacity public transport in the area.

- Have regard for court judgements which elaborated on this issue.
- Provide justification for the proposed development in the context of local plans and policy and national policy and be cognisant of how national policy is interpreted.
- Demonstrate a robust justification for the proposed development including transport capacities.

#### **Planning Authority's Comments:**

- The current public realm is poor and is a hostile environment for pedestrians. The district centre is very vehicle focused.
- The development is supported in terms of enhancement of the public realm but further work and improvements are required.
- Proposed development must encourage residents to use pedestrian links by extending the pedestrian network, and to shift transport modes.
- There are some bus routes but they operate at 20 and 30-minute intervals at present.
- There are proposals for improved bus linkages but there is no timeline for current plans.
- Any application should be referred to Iarnród Éireann and the NTA for comment.

#### **Prospective Applicant's Comments:**

- Have had regard to the transportation proposals set out in Cork Metropolitan Area Transport Strategy (CMATS).
- CMATS provides that the train station is to be provided in the medium-term but no firm timeframe.
- There are currently regular bus services.
- CMATS also provides for improved bus services and a cycling route that will connect to the city centre.
- Proposed development site is within a 5-minute walk to Blackpool district centre.
- The area currently lacks residential development, and the proposed development seeks to address this imbalance.
- There is a historic planning permission on the site.
- CMATS indicates that Bus Connects improvements would coincide with and link to rail improvements, which will benefit the site.
- Will consult with the National Transport Authority to provide more information on Bus Connects improvements.
- Proposed height is in line with national policy.
- The National Transport Authority has welcomed promotion of higher density schemes within transportation corridors elsewhere.
- Proposed height is based on existing services to a degree.

## **5. Public realm**

#### **ABP Comments:**

- Further clarity is required at application stage on areas to be included in public open spaces, particularly the inclusion of public footpaths.

- Any recommended special contributions by planning authority must be fully justified and identified at application stage including schedule and programming.
- All documentation needs to be fully co-ordinated at application stage in terms of the application site boundary.

**Planning Authority's Comments:**

- Proposals are generally welcome.
- Proposed development needs further intervention in terms of creating a friendly pedestrian environment given the location and scale of development, particularly along Redforge Road.
- Any works proposed should be included within red line boundary.
- The Local Authority have no proposals for works in this area currently.
- Will engage with the prospective applicant further in this regard, including possible special contributions toward such works.

**Prospective Applicant's Comments:**

- Seeking to introduce a footpath on the eastern side of the road and connect to an existing bus stop.
- Seeking to turn this road into a street.
- Details of the proposed raised table on Red Forge Road will be finalised with the planning authority.
- The developers are fully cognisant of the development of the railway station. They had looked at works and landscaping on the railway embankment as part of linkage to the station.
- Issues of consent arise in this regard.
- Will consider what additional measures can be provided and will engage with the planning authority further in this regard.

**6. Any other matters**

**ABP Comments:**

- Site specific assessments for ground contamination are required at application stage.
- Address planning authority's queries on drainage.
- Address any Material Contraventions and have regard to recent judgements from the courts on the interpretation of development plan provisions.

**Planning Authority's Comments:**

- Provide rationale for proposed 19-storey height at this location.

**Prospective Applicant's Comments:**

- The site will be subject to an appropriate assessment.
- Will address any Material Contraventions.
- It is fully intended to progress this application which is regarded as a viable development proposal.

- **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](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](mailto:spatialplanning@water.ie)

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Tom Rabbette  
Assistant Director of Planning  
March, 2021