



An
Bord
Pleanála

Record of Meeting ABP-309260-21

Case Reference / Description	Demolition of existing buildings, 131 no. Build To Rent apartments and associated site works. East Douglas Street, Douglas, Co. Cork.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	19 th March 2021	Start Time	10:00 a.m.
Location	Via Microsoft Teams	End Time	11:45 a.m.
Chairperson	Tom Rabbette	Executive Officer	Helen Keane

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Daire McDevitt, Planning Inspector
Helen Keane, Executive Officer

Representing Planning Authority

Eoin Cullinane, Planner, Planning
Simon Lyons, Senior Executive Engineer, Drainage
Cathy Beecher, Senior Executive Engineer, Roads
Tony Duggan, City Architect, Architects
Lucy Teehan, Senior Executive Planner, Planning

Representing Prospective Applicant:

John O'Regan, Sirio Homes
Tom Murphy, Sirio Homes
Brian McCutcheon, McCutcheon Halley
Màiri Henderson, McCutcheon Halley
Patrick O'Toole, Meitheal
Mark Dignam, Meitheal
Brian Murphy, MHL 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:

- 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 18th February 2021 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 25th January 2021 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. Compliance with local planning policy - SE-T-04
2. Design Strategy including inter alia: density, height, public realm, architectural response to the site context
3. Residential Amenities
4. Issues raised by Transport Mobility Section
5. Issues raised by Drainage Section
6. Any Other Business

1. Compliance with local planning policy - SE-T-04

ABP Comments:

- Address compliance with local planning policy - SE-T-04
- Justification/rationale for level of residential at this location

- Masterplan for all lands within SE-T-04
- Provide a strong justification/rationale at application stage

Planning Authority's Comments:

- Acknowledges that the national guidance indicates for a higher density
- The draft city development plan is due for publication in June
- Proposed density is excessive for site
- Proposed development will put a great demand on public transport in the area and may be contravening SE-T-04

Prospective Applicant's Comments:

- National policy sets the context for the proposed development
- Proposed development has regard for land use, transportation study and Local Area Plan
- Residential objectives not yet being achieved
- The Local Area Plan provides for approximately 20-hectares of residential development in the area
- There is a significant shortage of housing in the Douglas area
- Stresses importance of the mandatory objective of significant increase of housing in the area
- The proposed development delivers a substantial amount of what needs to be delivered in SE-T-04 area in a national context
- The site is well located in terms of public transport, the 220 bus route passes the proposed development
- The proposed development is in a town centre zone
- The site is well serviced, with no infrastructural constraints
- The proposed development can be delivered in the short-medium term
- Will identify any Material Contraventions and will take a precautionary view, will put forward a justification for these.
- Public transport will be provided by improved bus services
- Cork will not achieve national targets if density is only achieved near rail system

2. Design Strategy including inter alia: density, height, public realm, architectural response to the site context

ABP Comments:

- Justification/rationale for design strategy
- Justification and rationale for proposed density and height
- Policy context needs to be addressed.
- Concern regarding appropriateness of proposed height at this location, density and impact on area.
- How the development addresses public realm.
- Interface with residential to the south and Aldi site to the north.
- How it address Church Street ACA
- Visual Impacts

Planning Authority's Comments:

- Efforts should be made to create an urban block of 5-6 storeys
- Justification for height at this location is tenuous
- A tall building is not appropriate at this location
- The creation of a public realm and development of urban blocks is desired in this area
- There are currently no planning applications on adjacent development sites
- There is potential for further development in area
- Some inaccuracies in submitted documentation in prevailing heights

Prospective Applicant's Comments:

- The proposed development site is suitable for a district landmark building, and the proposed development will create a sense of place in Douglas
- A pedestrian-friendly environment is provided
- Disagree with the planning authority regarding inaccuracies, the design statement includes a design strategy with detail on prevailing heights
- The site to the north of the proposed development is being developed by a discount retailer
- Proposed development site is a 'last chance' for residential development to take place in Douglas, much of the SE-T-04 area is already developed
- The proposed development seeks to bring life back into the Douglas area, the subject site presents a last chance in that regard

3. Residential Amenities

ABP Comments:

- Address impact on apartments to the south of the proposed development
- Address area between Blocks A and B
- Potential visual dominance and over-bearing issues need to be addressed
- Access to daylight, sunlight and overshadowing (within the scheme and adjoining properties/lands)
- Provide a non-technical report on impacts at application stage
- Have consideration for impacts on adjoining sites, including potential overbearing impacts, overshadowing, access to daylight/sunlight and impact on development potential of adjoining lands/properties
- Clarify if the proposed pool will be covered
- Micro-climate analysis required

Planning Authority's Comments:

- Proposed development will depreciate value of apartments to the south of the development site
- Concern that there will be overshadowing on future developments
- The typology is unsuitable

Prospective Applicant's Comments:

- The ground floor apartments overlook roof area on adjacent buildings
- The proposed development does not overshadow the building to the south of the site

- Sunlight and daylight analysis will be included at application stage
- There is no short-term change on the development potential for the site to the north of the site
- There are 5 surface car parks within 150 metres of the proposed development
- Proposed development has no residential neighbours to the north, west or east of the site
- The applicant has a right of way to the north of the proposed development across the retail site
- Have had positive discussions with Aldi
- Proposed design is of a very high standard

4. Issues raised by Transport Mobility Section

ABP Comments:

- Address the car parking strategy proposed
- Address potential conflicts with cyclists and pedestrians and access via car park to the north.
- Provide a strong justification and rationale for parking and connectivity
- Advised to discuss issues with the planning authority prior to lodging an application

Planning Authority's Comments:

- Cyclist connectivity needs to be addressed in the wider area
- There are currently bus routing issues in Douglas
- Cycling and walking needs to be fully addressed in the proposed development
- Concerns regarding parking overspill
- The level of development is too high for current level of connectivity in Douglas

Prospective Applicant's Comments:

- Have carried out consultations with the planning authority
- Planning authority have requested a traffic and transport assessment, road safety audit, mobility management plan and a construction management plan
- No parking is provided in proposed development due to the high-quality public transport adjacent to the site including a high frequency and 24-hour bus service, and excellent connectivity to the city centre
- Proposed development is well-served by local amenities
- Will carry out parking occupancy survey on vicinity of site
- Proposed scheme is Build To Rent
- Any potential conflicts will be addressed and mitigated

5. Issues raised by Drainage Section

ABP Comments:

- Address lack of information provided of detailed drainage proposals submitted
- Address issues raised by Planning Authority
- No recourse for further information at application stage so technical issues need to be addressed.
- Suggest liaison with Planning Authority prior to application.

Planning Authority's Comments:

- Concern regarding lack of drainage detail
- Flood risk assessment was submitted, some issues to be addressed but nothing insurmountable
- Can discuss above with prospective applicant prior to their lodging of an application

Prospective Applicant's Comments:

- Unable to access drainage survey prior to lodging pre-application documentation due to Covid
- Will be segregating drainage system
- There are no concerns regarding sewerage
- Flood risk assessment will be submitted with the application
- Have addressed planning authority concerns and will discuss further with the planning authority

6. Any Other Business**ABP Comments:**

- There is no recourse for further information at application stage
- Ensure application documentation is consistent (drawings, reports, different experts)
- Have regard for fire officer comments in Planning Authority Opinion
- Childcare report required
- Address any Material Contraventions if they arise

Planning Authority's Comments:

- Include a childcare report with application documentation
- Contact the Housing Section regarding Part V requirements

Prospective Applicant's Comments:

- Proposed development site is the only site that can deliver residential housing in the next 20 years in this urban block
- Cork is under enormous pressure to deliver rental accommodation
- There is a need for residential units in Douglas

- **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
, 2021