



An
Bord
Pleanála

**S. 6(7) of Planning and
Development (Housing)
and Residential
Tenancies Act 2016**

**Inspector's Report on
Recommended Opinion**

ABP-306260-19

Strategic Housing Development	120 no. residential units with crèche and all associated site works.
Location	Bloomfield Park, Bracklin Road, Edgeworthstown, Longford.
Planning Authority	Longford County Council
Prospective Applicant	John Mc Carthy
Date of Consultation Meeting	17 th February 2020
Date of Site Inspection	5 th February 2020
Inspector	Erika Casey

1.0 Introduction

- 1.1 Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the Planning Authority, the purpose of this report is to form a recommended opinion as to whether the documentation submitted with the consultation request under section 5(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 - (i) constitutes a reasonable basis for an application under section 4, or (ii) requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

2.0 Site Location and Description

- 2.1 The subject site with a stated area of 6.6 ha is located on the Bracklin Road to the northwest of Edgeworthstown, c. 1.2km from the town centre. Edgeworthstown is located on the N4/M4 motorway and the Dublin to Sligo rail line. It is approximately 12km to the east of Longford Town. The site is generally rectangular in shape with the exception of a narrow strip of land to the north west that relates to a right of way to adjoining lands. The site is undeveloped and greenfield in character. There are some trees and hedgerows present along existing field boundaries. The site has a varying topography with levels ranging from 96OD at the southern end to 106OD at the northern boundary.
- 2.2 The site is primarily located to the rear of seven existing detached bungalows located along the Bracklin Road. The site also wraps around an existing complex of farm buildings including a traditional thatched cottage, as well as an existing dwelling located to the north of the bungalows. These are excluded from the application site. The site, therefore, has limited frontage to the Bracklin Road. Vehicular access to the site is proposed to the south east of the bungalows via an existing access road that also serves a large residential estate known as Bracklin Park. There are additional residential developments located to the south and south east of the site including the estates of Cloverwell, Shannon Park and Abhainn Glas. To the north and west, is undeveloped agricultural land. To the south west, there is a further undeveloped site that is subject to a planning application for 20 houses.
- 2.3 The site is located within a 60kph zone. The detached bungalows which are located to the south of the site on the Bracklin Road are set back from the road edge

however, there is no footpath provided in this area. The public footpath on the Bracklin Road commences at the entrance to the estate that is located immediately to the south of the subject site, Bracklin Park.

3.0 Proposed Strategic Housing Development

3.1 The proposed development comprises:

- The construction of 120 residential units comprising: 24 no. 2 bed units, 48 no. 3 bed units, 45 no. 4 bed units and 3 no. 4+ bed units. Eight different house types are proposed.
- Childcare facility with a floor area of 200 sq. metres.
- A community centre with a floor area of 200 sq. metres.
- A local shop/convenience store with a floor area of 100 sq. metres.
- The development also includes a multipurpose all weather play area, 270 no. car parking spaces and all associated development.

3.2 The housing mix is as follows:

Unit Type	No.	Percentage
1 bed dwelling	0	0
2 bed dwelling	24	20
3 bed dwelling	48	40
4 bed dwelling	45	37
4+ bed dwelling	3	3
Total	120	100

Key Parameters

Parameter	Site Proposal
Gross Site Area	6.6ha
Site Area excluding wayleave lands and Bracklin Park Link Road	6.10
Open Space	1,000 sq. metres
Houses	120
Density	20 units per ha
Crèche	200 sq. metres
Shop/Community Centre	300 sq. metres
Part V	13 units
Parking	270 spaces

3.3 The applicant is proposing to construct the development over 5 phases. It is detailed that it is proposed to install a private on site temporary waste water treatment plant to service 24 houses in Phase 1. The temporary WWTP will be decommissioned and removed during Phase 2 when the Edgeworthstown public WWTP is upgraded by Irish Water in 2023.

4.0 Planning History

4.1 There have been a number of previous applications on the subject lands.

Application Reference 04/679/ Appeal Reference PL14.211024

4.2 Permission refused in June 2005 by An Bord Pleanála for a development comprising 105 houses. The reasons for refusal were as follows:

1. *Having regard to the siting of the proposed access road and houses and the general layout proposed, it is considered, notwithstanding the revised layout received by An Bord Pleanála within the first party appeal, that the proposed development would give rise to a substandard level of residential amenity for the proposed occupiers of the development and would seriously injure the amenities of the area and of property in the vicinity by reason of the poor layout*

and distribution of public open space, excessive provision of roads and inadequate provision of rear gardens. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

2. *Having regard to the submissions lodged with the planning application and appeal and having regard to the proximity of existing dwellings served by individual septic tank drainage systems, the Board is not satisfied that adequate provisions have been made or are available to serve the proposed development with an adequate water supply or to satisfactorily accommodate both the existing and proposed housing's drainage requirements. The proposed development would, therefore, be prejudicial to public health.*

Application Reference 04/1201

- 4.3 Permission granted by Longford Co. Co. in April 2005 for a 12 inch Foul Sewer Pipe.

Application Reference 05/558/Appeal Reference PL14.218458

- 4.4 Permission granted by the Board in January 2007 for a development comprising 84 no. dwellings in a mixture of 2, 3 and 4 bedroom units. Permission was also granted for a crèche and all infrastructural works including a temporary water supply pending the upgrading of the water supply to the site. Further amendments to this permission for the construction of 3 additional units was granted under application reference 08/454/Appeal Reference PL.14.231422. An extension of duration permission was granted under application reference 13/151. This expired in January 2017.

Application Reference 13/179/Appeal Reference PL.243139

- 4.5 Permission refused by the Board in July 2014 for a development comprising 64 dwellings. The reasons for refusal were as follows:
 1. *Having regard to the identified limited capacity to accommodate additional development of the Edgeworthstown wastewater treatment plant, to the identified cost of the necessary upgrading works to this plant and to the lack of clarity with regard to the availability of funding and timeframe to undertake such upgrading works, the Board is not satisfied that, notwithstanding the existing permission for development on the site, the additional loading generated by the proposed development could be satisfactorily accommodated at the existing treatment plant without adversely affecting water quality and causing a breach*

of the combined approach as set out in the Waste Water Discharge Authorisation Regulations, 2007, as amended. The proposed development would, therefore, be prejudicial to public health. Furthermore, development of the kind proposed would be premature by reference to an existing deficiency in the sewerage facilities and the period within the constraints involved may reasonable be expected to cease.

2. *Having regard to the design and layout of the open spaces within the development, in particular, the incidental areas of open space located at the south-west corner of the site between units 12 and 13 and to the side of unit 26 and the area previously occupied by the crèche building, and to the absence of a connection between the site and the existing footpath network in the town and the uncertainty regarding when such a connection may be provided, it is considered that the proposed development would seriously injure the visual amenity of the overall development particularly in the area of the entrance into the development, would lead to potential issues arising from the poor supervision of open spaces and would endanger pedestrian safety. The proposed development would, therefore, comprise a substandard form of residential development which would seriously injure the visual and residential amenities of the area and be contrary to the proper planning and sustainable development of the area.*

4.6 The Board Direction stated the following:

“In arriving at its decision, and in particular with regard to the Board’s second recommended reason for refusal, it was considered that any revised development proposal for the site should adequately take account of/facilitate the future provision of public drainage to accommodate existing ribbon development served by individual wastewater treatment systems.

In arriving at its decision, the Board noted the Inspector’s fourth recommended reasons for refusal and considered that any revised development proposal for the site should provide for childcare facilities. The Board decided to refuse permission for two substantive reasons only.”

Adjacent Lands

Application Reference 04/753/Appeal Reference PL14.210359

- 4.7 Permission refused by the Board in June 2005 for a development comprising 6 no. houses, shop and tea room with parking.
- 4.8 The reasons for refusal were as follows:
- 1. The proposed development which seeks to demolish an existing traditional thatched and slated dwelling house and related stone outbuildings and the clearance of the stone walls and gated entrance and an orchard which form the setting of this dwelling which is considered to be of a heritage value by reason of its type, condition and setting, would result in the loss of this important complex and would, therefore, be contrary to the proper planning and sustainable development of the area.*
 - 2. The proposed development which seeks to replace an existing thatched/slated dwelling and associated outbuildings of a serviceable condition with a replacement thatched structure of a pastiche style and design, together with the provision of multiple housing of a terraced type would, by reason of its design, density and location result in an incongruous development which would materially contravene the policies of the current Longford County Development Plan with regard to the design and siting of such development and would, therefore, be contrary to the proper planning and sustainable development of the area.*

Application Reference 19/123

- 4.9 Permission sought for a development comprising of 20 units on lands located to the south west of the site. Further information requested on multiple grounds. Decision pending.

5.0 National and Local Planning Policy

5.1 National Policy

- 5.1.1 The **National Planning Framework - Project Ireland 2040**, published in 2018 is the Governments plan for shaping the future growth and development of Ireland to 2040. Under National Strategic Outcome 1 (Compact Growth), the focus is on pursuing a compact growth policy at national, regional and local level. From an urban

perspective the aim is to deliver a greater proportion of residential development within existing built-up areas of cities, towns and villages, to facilitate infill development and enable greater densities to be achieved, whilst achieving high quality and design standards.

5.1.2 The NPF includes a specific Chapter, No. 6, entitled 'People Homes and Communities', which includes 12 objectives among which, Objective 27 seeks to *'ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages'*. Objective 33 seeks to *'prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location'*. Objective 35 seeks to *'increase residential densities in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights'*.

Section 28 Ministerial Guidelines

5.1.3 Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submission from the Planning Authority, I am of the opinion that the directly relevant S.28 Ministerial Guidelines are:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual').

Chapter 6 of the guidelines refer to small towns with a population of less than 5,000. It states that development in such towns must be plan led and contribute to compact settlements where local trips can be made on foot; that higher densities may be acceptable if they reinforce the character of the settlement; that housing there may offer alternatives to single houses in the countryside; and that the scale of new schemes would be proportion to the pattern and grain of existing development. It recommends densities of 20-35dph for residential development on sites at the edges of the centres of those town, and that consideration be given to some lower density development of 15-20dph on their peripheries as an alternative to one-off housing.

- Design Manual for Urban Roads and Streets.
- The Planning System and Flood Risk Management (including associated Technical Appendices).
- Childcare Facilities – Guidelines for Planning Authorities.
- Urban Development and Building Height Guidelines 2018.

5.2 Regional Policy

5.2.1 The **Eastern and Midland Regional and Spatial Economic Strategy**, which came into effect on June 28th, 2019, builds on the foundations of Government policy in Project Ireland 2040, which combines spatial planning with capital investment.

Chapter 4 (People & Place) sets out a settlement hierarchy for the Region and identifies the key locations for population and employment growth. It includes *Dublin City and suburbs*, *Regional Growth Centres* (Drogheda, Athlone and Dundalk) at the top of the settlement hierarchy and identifies *Key Town's* in each area with the highest potential to accommodate growth. Other centres lower in the settlement hierarchy including *Self-Sustaining Growth Towns*, *Self-Sustaining Towns*, *Towns & Villages*, and *Rural Areas* are not specifically identified, and remain to be defined by the development plan.

5.2.2 Under the RSES Edgeworthstown would be considered a Self-Sustaining Growth Town which is defined as a settlement with a strong service and employment function and may have the capacity to support a level of commensurate population and employment growth to become more self sustaining, in line with their capacity of public transport, services and infrastructure, to be determined by local authorities.

5.3 Local Policy

Longford County Development Plan 2015-2021

5.3.1 Under the County Plan, Edgeworthstown is classified as a Tier 3 Service Town. It serves a large hinterland and provides important local services to the community. It is detailed that emphasis will be placed on maintaining Edgeworthstown's role as a county service centre, by way of orderly consolidation and expansion of services to meet the needs of the locality, commensurate with its position in the Settlement Hierarchy in a manner that supports the upper tiers of the urban hierarchy.

5.3.2 The Core Strategy details that there is a population allocation of 679 persons to be accommodated in Ballymahon, Edgeworthstown, Granard and Lanesborough over

the period to 2022. This equates to a requirement for c. 283 house units.

5.3.3 The subject site is primarily zoned 'Residential' the objective of which is *"to primarily provide for residential development; to preserve and improve residential amenity, dwellings and compatible uses including social and community facilities, open spaces and local shopping facilities."*

5.3.4 Other uses including local shops, crèches, schools, nursing homes, open space and recreation facilities will be permitted where they have the potential to strengthen communities and encourage the enjoyment of residential amenity and where they are appropriate in scale and do not unduly interfere with the predominant residential land use.

5.3.5 It is stated that it is considered appropriate that existing residential areas are augmented and areas where gaps or leapfrogging of development have occurred are infilled and the town consolidated for the purposes of an appropriate and sustainable town structure.

5.3.6 A small portion of the site at the proposed vehicular entrance is zoned Residential, Amenity and Green Spaces, the objective of which is *"to primarily provide for recreational open space, environmental buffers and ancillary structures"*.

6.0 Forming of the Opinion

6.1 Introduction

6.1.1 Pursuant to section 6(7) of the Act of 2016, regard is had in the forming of the opinion to the documentation submitted by the prospective applicant, the Planning Authority submission and the discussions which took place during the tripartite consultation meeting. I shall provide a brief detail on each of these elements hereunder.

6.2 Documentation Submitted

6.2.1 The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017. This information included, inter alia, Completed Application Form, Cover Letter, DMURS Design Statement, Residential Quality Audit, Outline

Construction and Environmental Management Plan, Planning Report and Statement of Consistency, Appropriate Assessment Screening, Archaeology and Built Heritage Assessment, landscape and Ecology Report, Report on the Effects on the Environment, Traffic and Transport Assessment, Letters of consent, School Provision Report, Road Safety Audit, Civil Engineering Report, Site Specific Flood Risk Assessment, Architectural and Engineering drawings.

6.2.2 Section 5(5)(b) of the Act of 2016 requires the submission of a statement that, in the prospective applicant's opinion, the proposal is consistent with both the relevant objectives of the Development Plan or Local Area Plan concerned, and the relevant guidelines issued by the Minister under section 28 of the Act of 2000. These statements have been submitted, as required. The applicant's case is summarised as follows:

- The development which is on residential zoned land and located in close proximity to the town centre is in accordance with the principles of the NPF. The development is located in a Self Sustaining Growth Town as defined by the RSES and will deliver the objective of consolidating growth within an existing settlement.
- The subject development proposes a height variation range of single storey, two and three storey dwellings as appropriate for this edge of town location. All units are own door and an appropriate mix of dwellings is proposed.
- The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas state that densities to a range of 20-35 dwellings per hectare will be appropriate in edge of centre sites in smaller towns. The proposed density of 20 units per hectare is consistent with this guidance. The development is consistent with the 12 criteria set out in the Urban Design Manual.
- The development is consistent with the relevant standards set out in the Quality Housing for Sustainable Communities Guidelines with regard to unit size, internal areas, storage dimensions and private open space.
- The development seeks to prioritise pedestrian and cyclists throughout in accordance with the policies set out in DMURS. The proposed road hierarchy has been developed in accordance with DMURS principles as it consists of the

north west-south east spine road and a network of local roads providing secondary access. A number of entrances from the spine road are proposed to provide access to the housing via a network of secondary roads. The layout encourages permeability throughout. Cul de sacs have been kept to a minimum. Linkages are proposed to improve connectivity to the wider area. The design of the internal access roads will ensure low vehicular speeds. Long straight stretches of road are avoided where possible.

- The development will provide for an on site childcare facility which will cater for 35 children.
- A Site Specific Flood Risk Assessment has been prepared. The site is located in flood zone C.
- The upgrade of the public Waste Water Treatment Plan in Edgeworthstown has been included in the capital budget for the period 2020-2025 and will be completed on or before 2023. IW have confirmed that it is feasible to install a private on site WWTP to serve the 120 houses pending the upgrade of the Edgeworthstown WWTP. It is proposed that the initial phase consisting of 24 units will be served temporarily by the private WWTP. The remaining four phases will be served by the public WWTP.
- There is sufficient capacity in local schools to facilitate the development.
- The subject application and the proposed construction and occupation of c. 24 units per annum is a reasonable forecast for housing demand over the next 5 years. The development is in line with the core strategy. It is in compliance with the residential standards and policies set out in the County Development Plan.
- The development has been designed to incorporate as far as possible the existing hedgerows and the removal of hedgerows has been kept to a minimum. The development incorporates high quality play facilities including a multi games play space.

6.3 Planning Authority Submission

- The development is consistent with the zoning objectives associated with the lands. The development potential of the lands will enable sustainable sequential growth in compliance with the NPF. The development is considered

to present an appropriate housing model for Edgeworthstown offering a diverse mix of housing typologies in a convenient accessible location. The layout provides for a highly permeable scheme.

- Outer suburban/greenfield lands are encouraged for development at densities in the region of 20-35 dwellings per hectare in the case of Edgeworthstown which has a population of 2,072 in the 2016 Census. The density of c. 20 units per ha is in the range of the recommended minimum and is considered appropriate having regard to the context of the application lands. The development has an adequate mix of size, type and height of development.
- The phased delivery of housing and infrastructure works is acceptable in principle.
- A number of specific design points raised by the Housing Department. There are a number of design concerns that should be addressed in any Stage 2 proposal.
- The layout of the development has not adhered to the principles of good design including DMURS with a dominating road network, no demonstrated cycling provision, negative space and pinch points.
- The proposed house designs are repetitious of other residential developments already in the county. The development would benefit from a new set of house design typologies. Design proposals for the shop and crèche have not been submitted.
- No adequate site levels or sections submitted. Multiple long sections should be prepared at 1:200 scale.
- The reasoning behind a proposed access road with restricted access to the south west should be clarified.
- The distribution of open space is considered acceptable and accords with the Development Plan.

Environment Section (24.01.2020)

- Bond should be put in place to fully cover connection to the public sewer once the IWWTP has been upgraded and removal/remediation of the temporary WWTP.

- Buffer zone to be provided between the development and the proposed temporary WWTP.
- A discharge to the existing stream would not be considered on any grounds due to the lack of assimilative capacity in the surface water streams in the area

Road Design Engineers Report (23.01.2020)

- The developer should be requested to verify the diameter of the existing storm water drain and provide design confirmation that their proposed system will operate without impact on the existing drainage system into which it outfalls.
- Storm water layout should be reviewed to simplify. Additional provision shall be made to collect any storm water runoff from the existing bungalow houses.

Roads and Transportation Department

- Applicant shall be required to provide a revised layout for the junction with Bracklin Road in accordance with DMURS.
- Number of detailed technical issues raised including omission of raised pedestrian crossings and zebra crossings, clarity regarding parking issues, boundary details, compliance with DMURS, turning areas etc.
- Car parking is acceptable. Consideration could be given for the provision of cycling facilities within the proposed development.

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6.4 Prescribed Bodies

Irish Water (03.02.2020)

- In order to serve the proposed development, an upgrade to the existing Edgeworthstown Wastewater Treatment Plan is required. IW does not have the wastewater capacity in the area at present to cater for the development.
- IW confirmed that the option presented by the applicant to construct a full on site treatment and a foul gravity service connection to the connection point on the IW network is feasible. This option is subject to the treatment of Ammonia to a level of 1mg/l to remove load prior to discharge to the Irish Water owned wastewater network.

- Once Edgeworthstown WWTP has been upgraded, the Applicant shall decommission the full on site treatment unit and connect to the Irish Water foul sewer network that leads to Edgeworthstown WWTP.
- The operation of such treatment works by the applicant shall continue until such time as the proposed upgrade of the existing Edgeworthstown Wastewater Treatment Plant operated by Irish Water as above is completed and commissioned. The design of the private on site wastewater treatment plant should also include for the decommissioning and bypassing of the plant once the proposed upgrade of the existing Edgeworthstown Wastewater Treatment Plant is commissioned.

6.5 Consultation Meeting

6.5.1 A Section 5 Consultation meeting took place at the offices of Longford Co. Co. on the 17th of February 2019, commencing at 11.30 PM. Representatives of the prospective applicant, the Planning Authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.

6.5.2 The main topics raised for discussion at the tripartite meeting were based on the Agenda that issued in advance and contained the following issues:

1. **Principle of Development:** compliance with the provisions of the core strategy having regard to the RSES and the principle of sequential development.
2. **Development Strategy:** with particular regard to overall site layout, urban design and architectural approach; distribution and layout of open space; road hierarchy and compliance with DMURS; connections and permeability; house design and typology; design of neighbourhood centre; phasing of development; access strategy including measures to address wider pedestrian, cyclist and public transport connectivity.
3. **Drainage**
4. **Crèche and Social Infrastructure**

5. Any Other Matters

6.5.3 In relation to the **Principle of Development**, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- The appropriateness of the lands for development in terms of the sequential approach set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009), and having regard to the core strategy, extent of zoned land and extant permissions. It was highlighted by Longford County Council that other parcel of land zoned for residential development had not come forward for development and that there were constraints associated with it.
- The publication of the Regional Spatial and Economic Strategy for the Midlands and Eastern Region and implications for Edgeworthstown in terms of its future growth and development. It was confirmed by Longford Co. Co. that the County Development Plan is under review but it is not envisaged that there will be any significant change to the core strategy or settlement hierarchy. They confirmed they had no objection to the quantum of development proposed in light of the RSES. It was acknowledged that Edgeworthstown was an appropriate location for further growth having regard to the extent of services in the town and the fact that it was served by good public transport.

6.5.4 In relation to the **Development Strategy** with particular regard to overall site layout, urban design and architectural approach; distribution and layout of open space; SuDS; road hierarchy and compliance with DMURS; connections and permeability; house design and typology; design of neighbourhood centre; phasing of development; access strategy including measures to address wider pedestrian, cyclist and public transport connectivity, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- The need to create a high quality living environment with a focus on quality of place making and defined character areas.
- The disposition of open space provided and the need to develop an appropriate hierarchy of open spaces and ensure open space is usable and functional; surveillance of open spaces and ensuring the open spaces are well connected and integrated within the overall site.

- The need to create appropriate connections and permeability throughout the site.
- Road layout and design, the need for an appropriate hierarchy of streets, shared surfaces and compliance with the principles of DMURS. Junction design with the Bracklin Road and design of cycle routes requires further consideration. Concerns regarding prevalence of raised crossings.
- Housing unit typology, elevational treatment and design. The need for greater variety and avoidance of monotonous and repetitious elevations was highlighted.
- Finishes and materials, the need for greater quality and an increased palette of materials that is reflective of the design.
- The need for a high quality landscape design and a greater range of landscaping materials. Variation of landscaping where the street interface with the roads should be provided. Opportunities for play equipment to suit different age groups should be explored. The requirement for high quality boundary treatment and retention of attractive features such as the old stone wall at the Bracklin Road.
- Treatment of urban edge along the Bracklin Road and need for appropriate set back of dwellings from the public road. Treatment of the entrance of the development from Bracklin Park needs further consideration.
- Phasing of the development and the need to deliver coherent phases of development.
- Design of neighbourhood centre and how this should be the focal point of the development and address street. Extent of surface parking should be reconsidered.
- The requirement of better surveillance within the development and removal of dead frontages with boundary walls fronting onto streets. Narrow pinch points to be avoided.
- Bin storage.

6.5.5 In relation to **Drainage**, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- The need to address the technical concerns of Longford County Council.
- Scope to provide a greater variety of SUDs measures as part of the landscape strategy.
- On site Wastewater Treatment Plant and requirements of IW. Concerns were raised regarding the potential prematurity of the development pending the necessary upgrades to the Edgeworthstown Wastewater treatment Plant. It was noted that there is some uncertainty as to the timescale within which works to the WWTP would be carried out and whether consent/CPO for the upgrade works would be required. It was highlighted that this may pose some uncertainties as to the length of time that a temporary treatment plant may be required on the subject site pending the necessary upgrade works. It was also highlighted by Longford Co. Co. that there may be network constraints that would require further assessment and concerns were raised regarding legacy issues with on site temporary WWTP. It was noted that the Board must be satisfied that the necessary infrastructure to facilitate the development can be delivered in a meaningful timescale.

6.5.6 In relation to the **Crèche and Social Infrastructure**, An Bord Pleanála sought further elaboration/discussion/consideration of:

- Scale and viability of crèche and need for childcare demand assessment.
- Management and function of community centre and whether such a facility was required in the context of existing community infrastructure in the town.
- The appropriateness of a retail unit at this location in the context of the viability of the town centre where there is vacancy prevalent.

6.5.7 In relation to any **Other Matters**, An Bord Pleanála sought further elaboration/discussion/consideration of the following: impacts to bats and requirement to address technical matters raised by the Transportation Department of Longford Co. Co.

6.5.8 Both the prospective applicant and the Planning Authority were given an opportunity to comment and respond to the issues raised by the representatives of ABP. Those comments and responses are recorded in the 'Record of Meeting '306260' which is on file. I have fully considered the responses and comments of the prospective applicant and Planning Authority in preparing the Recommended Opinion hereunder.

7.0 Conclusion and Recommendation

- 7.1 Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 7.2 I have examined all of the information and submissions before me including the documentation submitted by the prospective applicant, the submissions of the Planning Authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the s.28 Ministerial Guidelines, and local policy, via the statutory plan for the area.
- 7.3 Having regard to all of the above, I recommend that **further consideration and/or possible amendment** of the documents submitted are required at application stage in respect of the following elements:
- Drainage and infrastructural constraints.
 - Development strategy.
- 7.4 Having regard to the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act **requires further consideration and amendment in order to constitute a reasonable basis for an application** under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 7.5 I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision making process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

8.0 Recommended Opinion

- 8.1 An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the

Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

8.2 Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála is of the opinion that the documentation submitted requires **further consideration and amendment** to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.

8.3 In the opinion of An Bord Pleanála, the following issues need to be addressed in the documents submitted to which section 5(5) of the Act of 2016 relates that could result in them constituting a reasonable basis for an application for strategic housing development:

1. Drainage and Infrastructural Constraints

- The wastewater infrastructural constraints associated with Edgeworthstown Waste Water Treatment Plant and associated network upgrade requirements which have yet to be constructed.
- The documentation at application stage should clearly indicate the nature of the constraints, the proposals to address the constraints and the timelines involved in addressing these constraints relative to the construction and completion of the proposed development. Clarity should be provided regarding the extent of works required to upgrade the Edgeworthstown WWTP as well as the consent process and timeline that will be required to undertake the upgrade works. The prospective applicant may wish to satisfy themselves that an application is not premature having regard to the information sought above. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

2. Development Strategy

Further consideration of documents as they relate to the development strategy for the site, in particular the architectural approach and overall layout of the proposed development in relation to:

- The configuration of the layout particularly as it relates to the creation of a hierarchy of high quality, functional and amenable public open spaces with maximum surveillance, appropriate enclosure, children's play, amenity and pedestrian connectivity should be given further consideration. Incidental and non usable strips of open space should be omitted. Unsupervised laneways between dwellings should be avoided.
- The overall design approach to the site to ensure that a range of high quality housing typologies are provided and that a high quality living environment is created with distinct character areas. Finishes and materials should be robust and ensure variety. Further consideration should be given to the interface of the development with the Bracklin Road.
- Further consideration of the documents as they relate to the layout and design of streets within the development and the requirements of DMURS regarding permeability and connections with existing street network; hierarchy of routes and street function; enclosure including building frontage, furniture and planting along streets; parking; widths of carriageways and footpaths; pedestrian crossing points; and types of junctions and corner radii. The submitted documents should demonstrate specific compliance with the particular stated provisions of DMURS. Generalised assertions regarding principles are not sufficient. If any cycle facilities are proposed, the specific compliance with the particular requirements of the National Cycle Manual should be demonstrated by the documents.
- That a high quality landscape strategy for the site is provided. Full details of boundary treatment should be provided. SuDS measures should be incorporated into the landscape proposals as appropriate.
- The design of the neighbourhood centre and crèche to ensure that the development appropriately addresses the street and that the layout is not dominated by surface car parking.

- The need to provide appropriate double fronted corner units particularly along road frontages and adjacent to public open spaces to ensure appropriate passive surveillance.
- Phasing strategy to ensure that phases are coherent and deliver an appropriate quantum of development.
- The documentation at application stage should clearly indicate how the 12 criteria set out in the Urban Design Manual which accompanies the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities have been complied with.

Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

8.4 Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. Childcare demand analysis and the likely demand for childcare places resulting from the proposed development.
1. Landscaping proposals including an overall landscaping masterplan for the development site. Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including details of play equipment, street furniture including public lighting and boundary treatments should be submitted. Report should address measure to protect existing trees and hedgerows to be retained.
2. A construction and demolition waste management plan.
3. A phasing plan for the proposed development which includes the phasing arrangements for the delivery of the public open spaces, surface water management proposals and Part V provision.
4. A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority.
5. A detailed report outlining any proposed works to be undertaken to the Bracklin Road in terms of pedestrian and cycle facilities, public lighting and any road

upgrade works necessary, particularly at the junction between Bracklin Park and Bracklin Road to facilitate the development and provide for appropriate connections to the wider area. The report should also detail who is going to undertake the works required and the timelines involved relative to the construction and completion of the proposed development. Details of areas to be taken in charge should be detailed. Letters of consent should be provided for any works outside of the applicant's control/ownership.

6. Detailed design of proposed surface water management system proposed including attenuation proposals and cross sections of all SuDS features proposed on site in the context of surface water management on the site.
7. Application drawings should include information in site levels and long sections through the development should be provided

8.5 Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. Minister for Culture, Heritage and the Gaeltacht (archaeology)
2. Heritage Council (archaeology)
3. An Taisce — the National Trust for Ireland (archaeology)
4. Irish Water
5. Longford County Childcare Committee

PLEASE NOTE:

8.6 Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Erika Casey

Senior Planning Inspector

2nd March 2020