



An
Bord
Pleanála

Inspector's Report PL 29N.246962

Appeal Reference No:

PL 29N.246962

Development:

PROTECTED STRUCTURE: Provision of a temporary development to the grounds of the All Hallows College, Grace Park Road, Dublin 9. The development will consist of the provision of a proposed temporary development to consist of a standalone 2 classroom primary school of modular construction consisting of 2 no. general classrooms, principal's office with associated circulation corridor, access doors, service connections and ancillary works which are within the curtilage of a Protected Structure at the All Hallows College, for use as a primary school for a period of 2 years.

Planning Application

Planning Authority:

Dublin City Council

Planning Authority Reg. Ref.:

2798/16

Applicant:

Department of Education & Skills

Planning Authority Decision:

Grant Permission with conditions

Planning Appeal

Appellant(s):

Aidan Kerins

Type of Appeal:

Third Party – V - Grant

Date of Site Inspection:

25th October 2016

Inspector:

Tom Rabbette

1.0 SITE LOCATION AND DESCRIPTION

The appeal site is located within the grounds of All Hallows College off Grace Park Road in Drumcondra in Dublin 9. The site is located along the eastern boundary of the All Hallows holding. There are two protected structures within the subject holding, Drumcondra House which is located to the south-west of the application site, was built in the 1720s and is of early Irish Georgian style, the other protected structure is known as the 'Temple', it is enclosed in the college cemetery to the south of the current application site. There are a number of other buildings of architectural interest within the curtilage most of which are associated with the college that operated at All Hallows, the college open in 1842. The application site is currently part of an open green area. The eastern boundary of the historic curtilage is located immediately to the east of the application site. There are a number of evergreen and deciduous mature trees located along this boundary adjacent the site. There is a large surface car park to the west and a large open green area to the north of the site.

2.0 PROPOSED DEVELOPMENT

The applicant, the Department of Education and Skills, is seeking permission to construction a prefabricated 2 classroom primary school on the site which is within the curtilage of All Hallows College. The prefabricated building is to be located along the eastern boundary of the campus. The applicant is seeking permission for a period of 2 years. The floor area of the subject structure is stated as 134 sq.m. In addition to the 2 classrooms, it will also accommodate an office and toilet facilities for the staff and pupils. The structure is to be surrounded by a proposed footpath that will connect to an existing footpath to the west of the proposed structure. It is also proposed to use an existing car parking area to the west to cater for additional vehicular traffic associated with the proposed temporary school. It is stated on file that the school is to accommodate Gracepark Educate Together National School. The school will utilise the existing vehicular entrance to the campus off Gracepark Road.

3.0 PLANNING HISTORY

2264/16: Retention permission granted to Rosmini Community School for 32 single storey prefabricated units within the curtilage of a protected structure at All Hallows College.

2442/16: Permission granted for alterations to link corridor between Drumcondra House (protected structure) and Chapel, works to Senior House, and works to Woodlock Hall.

3374/13: Permission granted for alterations to lobby area of Drumcondra House (protected structure).

2836/13: Permission granted for repair, alterations and improvement works to Drumcondra House (protected structure).

4.0 PLANNING AUTHORITY DECISION

4.1 Planning and technical reports

Planner's Report dated 24/06/16:

- Permission recommended subject to conditions.

Transport Infrastructure Ireland Report dated 26/05/16:

- No observations to make.

City Archaeologist's Report dated 13/06/16:

- The proposed development is bordering the Zone of Archaeological Constraint of a number of Recorded Monuments.
- Condition recommended.

Conservation Officer's Report dated 15/06/16:

- The context of the proposal is particularly significant as it is a surviving C18th planned landscape.
- The site is adjacent the walled boundary in part of the open parkland of the cultural landscape with a backdrop of trees.
- This historic complex has long been associated with education and comprises many layers of development since the construction of Drumcondra House.
- Drumcondra House is an early C18th plan form.
- The site of the principal structure has been modified and extended over several decades as part of the institutional use.
- There seems to be a somewhat disjointed approach to the maintenance and ongoing development of this complex and its built fabric.
- This type of historic complex needs to be managed in a holistic way to sustain it into the future and ensure its historic significance is safeguarded and not compromised.
- Prior to the approval of this proposal the applicant should confirm the status of this type of development within the context of an overall masterplan for this historic complex in order to avoid piecemeal development and ensure the significance of this protected setting is safeguarded.

Engineering Department Drainage Division Report dated 31/05/16:

- No objection subject to conditions.
- Existing public sewer running through the lands, a clear distance of 3 m between the sewer and structures is required.

Roads Street & Traffic Department Report dated 16/06/16:

- No objections subject to conditions.

Objections/observations: An objection on file addressed to the p.a. makes reference to the following matters: unsightly structures; impact on views; impact on building of strong historical importance; continued use of structures that are supposed to be temporary, and a time-line is sought for the termination of use of such unsightly structures.

0190/16: Pre-application consultation on the 13/04/16. Issues raised include: protected structure; architectural assessment; play area; flood risk, and site notices.

4.2 Planning Authority Decision

By Order dated 27/06/16 the planning authority decided to grant permission for the proposed development subject to 11 no. conditions.

5.0 GROUNDS OF APPEAL

Aidan Kerins, All Hallow's Square, Beresford, Griffith Avenue, Dublin 9.

The contents of the third party's grounds of appeal can be summarised as follows:

- All Hallow's College is a protected structure of significant historical importance.
- It must be protected from inappropriate developments.
- For several years now there have been a growing number of portacabin structures placed around the All Hallow's College campus on a 'temporary' basis.
- The number of these cabins continues to grow.
- They block out views of these historical buildings from the public road.
- There appears zero visible progress on a more suitable permanent school being constructed to allow the removal of these unsightly portacabins.
- The continual expansion by the College/Department of Education and Skills of placing such structures around this State owned campus is grossly unfair to the local community.
- Such approvals would not be granted to personal or industrial applicants, particularly in such close proximity to historical buildings and additionally, retention allowed over so many years.
- The DCC current planning approval is for a further two years, at which point, a further extension may be sought.
- The appellant is not opposed to the development of an appropriately designed school at this site.
- The appellant's objections are specifically related to the ongoing temporary use of portacabin buildings as a school.

- The portacabins are an inappropriate building type in terms of design, layout, finish, elevation treatment, etc. on a protected structure.
- There are no measures to include for appropriate set-down areas for student drop-off and additional car parking for staff.
- These portacabins are unsightly in their present context and not in-keeping with the original design intent of the All Hallow's College campus.
- They are detrimental to the property values of the surrounding homes.
- The portacabins spoil the views from the surrounding properties/roadways into the buildings and open areas/playing pitches of All Hallow's College.
- The currant drainage system appears not to take into account DCC's SuDS requirements.
- Concerns raised about compliance issues relating to various parts of the Building Regulations.
- The appellant requests that the p.a. decision be overturned.

6.0 RESPONSES/OBSERVATIONS TO GROUNDS OF APPEAL

6.1 Planning Authority response

There is no response on file from the planning authority at time of writing.

6.2 First party response

The contents of the first party's response to the grounds of appeal can be summarised as follows:

- Following demographic analyses, the Minister for Education & Skills announced the establishment of seven new primary schools to meet growing demographic needs in a number of areas.
- The Drumcondra/Marino/Dublin 1 school planning area is one such area.
- The Minister announced that a new 16 classroom school would open in September 2016 to serve this school planning area.
- This new 16 classroom primary school is required to ensure that there are sufficient primary school places and in particular junior infant places for the children living in this school planning area.
- The school, as with all new schools, will grow on an incremental basis, taking in junior infant children only in its first year of operation (2016/2017).
- In its second year of operation it will take in junior infant children and the children which were in junior infants will move into senior infants in the 2017/2018 school year and so on.
- This is necessary to ensure that the school grows in a sustainable way and also minimises the potential for the school to have a negative impact on other schools in the area.

- Current indications from the school authorities are that 28 junior infant children will attend the school in September 2016.
- Given that there is a need to commence operation in temporary accommodation pending the delivery of the school's permanent accommodation, the Department has informed the school that it can take in one junior infant class only each year while the school is in temporary accommodation.
- When the school moves into its permanent accommodation it can accommodate two classes of junior infant children each year.
- The project to provide a new permanent school building is on the Department's 6-year construction programme for 2018.
- The provision of the permanent building for this school is at planning stage but it is projected that the building will be completed by September 2018.
- The permanent school building will be delivered via a rapid delivery mechanism on the All Hallows campus subject to a positive planning application.
- Preparations are underway in the Department to prepare the planning application.
- The Department is liaising with DCU in the context of their masterplan for the campus and with DCC in this regard.
- It is planned that the temporary accommodation for the school would be removed by September 2018, at which point it is envisaged that the school will move into its permanent accommodation.
- The applicant refers to the 11 conditions attached to the p.a. decision to grant permission.
- The Department has made arrangements to ensure that all conditions would be implemented, including employing an archaeologist and an arborist to oversee the works to install the temporary accommodation.
- The maximum number of children using the planned temporary accommodation for this school will be 28 in 2016 and 56 in 2017, it is planned that the school will move into its permanent school building in 2018.
- The temporary accommodation is to be located in an unobtrusive area of the campus away from the buildings and would not intrude on the views of the campus.
- Given the appeal, the Department has made arrangements for the school to open in September 2016 in local accommodation on a very temporary basis.
- The current application is a completely separate development to the temporary accommodation which is already on site accommodating the post-primary school, Pobailscoil Rosmini.
- It was necessary for Pobailscoil Rosmini to vacate its permanent school building (which is located on the Grace Park Road adjacent the Childvision campus on the opposite side of Grace Park Road from All Hallows) following severe weather-related damage. It commenced

operations on a temporary basis from some 21 prefabs on the All Hallows campus, these prefabs have temporary permission which will cease in May 2018.

- A major building project for Pobailscoil Rosmini has been included in the 6-year construction programme 2016-2020 and is scheduled to commence construction in 2017 at its permanent location on the Grace Park Road.
- There were no appeals in relation to the Pobailscoil Rosmini prefabs.
- All of the existing prefabs on the site relate to the post-primary school, Pobailscoil Rosmini, the current application relates to a new primary school for Gracepark Educate Together National School (GETNS).
- The appellant's assertion that a further extension may be sought by GETNS is conjecture.
- Prefab structures are used on a temporary basis nationwide to provide urgently needed school accommodation pending the delivery of a more permanent solution.
- Vehicular and pedestrian access was agreed with the local authority and the Roads Department are satisfied with the proposals.
- The location of the temporary accommodation was agreed upon by the Department and DCU so as to be as non-intrusive as possible and to minimise the impact of the temporary structure.
- It is planned to be located in an unobtrusive area of the campus away from the buildings and would not intrude on the views of the campus.
- This type of building is used regularly for this purpose and comply with all the various building regulations.

7.0 POLICY CONTEXT

The statutory plan in place at the time of the planning authority's decision was the Dublin City Development Plan 2011-2017. The authority has since adopted a new Development Plan for the area. The Dublin City Development Plan 2016-2022 has been adopted and came into effect on the 21/10/16.

Dublin City Development Plan 2016-2022:

The site is located in an area where the land-use zoning objective is 'Z15 - to protect and provide for institutional uses' as indicated on Map B of the CDP. That map also indicates protected structures and sites of archaeological interest on the associated landholding of All Hallows (although not within or immediately adjacent the application site itself). Other relevant policies, objectives and sections of the CDP include the following:

Chapter 11 'Built Heritage and Culture' including:

Section 11.1.5.1 The Record of Protected Structures

Section 11.1.5.2 Protected Structures – Policy Rationale

Section 11.1.5.3 Protected Structures – Policy Application

Chapter 12 'Sustainable Communities and Neighbourhoods' including:
Section 12.5.4 Schools and Educational Facilities

Copies of the above extracts are in the attached appendix for ease of reference for the Board.

8.0 ASSESSMENT

8.1 I have examined all the plans, particulars and documentation on file. I have carried out a site inspection. I have had regard to relevant provisions of the statutory development plan for the area. I have also had regard to the contents of '*Architectural Heritage Protection – Guidelines for Planning Authorities*', in my opinion the main issues arising are:

- Principle of development
- Impact on architectural heritage and visual amenity
- Set-down area and car parking
- Other legal codes
- Flood Risk
- Impact on trees
- Appropriate Assessment

Principle of development

8.2 The proposal relates to the installation of a prefabricated 2 classroom structure for use as a primary school for a period of two years. The land use zoning objective for the site, Z15, permits such educational use in principle at this location. The site is within the grounds of All Hallows campus, it has a long-established educational use, it has recently been acquired by DCU.

Impact on architectural heritage and visual amenity

8.3 The appellant has raised specific concerns relating to the use of prefabricated temporary structures in the grounds of All Hallows. The concerns relate to the impact these structures have on the historical setting of the holding which contains two protected structures and a number of other structures that are of architectural heritage although not themselves protected structures. The appellant refers to the growing number of these prefabricated classroom buildings within this historical curtilage. It is held that they block out the views of the structures of architectural heritage. The appellant stresses that he is not opposed to the development of an appropriately designed school at the site, it is the design and nature of the prefabricated structures that is considered inappropriate given the sensitive context. The appellant refers to some 21 existing prefabricated buildings in and around the holding and objects to yet another such building now being added. The appellant refers to confusion within the local community relating to the use of the existing

prefabricated structures and the use of the proposed structure vis-à-vis use as a primary school or a secondary school.

- 8.4 I do not consider the appellant's concerns unwarranted or unreasonable. There are some 30 prefabricated structures similar to that now proposed already located within the curtilage of All Hallows. The design of these prefabricated structures, and the number of these structures, detract from the setting of the buildings of architectural heritage interest and the associated landscaped grounds. There is a concern that yet another prefab building will add to the proliferation of such structures in this sensitive location. In that regard, I note the concerns raised by the p.a. Conservation Officer in her report dated 15/06/16. The CO states, *inter alia*, that prior to the approval of the current proposal the applicant should confirm the status of this type of development within the context of an overall masterplan for this historic complex in order to avoid piecemeal development and ensure the significance of this protected setting is safeguarded.
- 8.5 While I share the concerns of both the appellant and Conservation Officer to some extent, I am of the opinion that the applicant's response to the grounds of appeal has brought a great deal of clarity to the main issue of concern here. The applicant has clarified that the existing prefabricated structures in the grounds of All Hallows relate to a temporary accommodation solution for a local secondary school that had to vacate its permanent location on the east side of Gracepark Road due to severe weather damage to that school building. It is stated in the response to the grounds of appeal that this secondary school commenced operations in prefabricated structures in All Hallows in September 2013, a retention permission for the prefabricated structures was granted in 2016 for a period of two years, permission for the use of these existing prefabricated classrooms will cease in 2018. Once the works to the permanent school on the east side of Gracepark Road are complete, the secondary school will return to its own permanent accommodation and the prefabs at All Hallows will be removed.
- 8.6 I draw the Board's attention to planning reg. ref. 2264/16 which appears to confirm the situation as outlined by the applicant in their response to the grounds of appeal (site layout plan, Executive Order and Planner's Report in appendix attached to this report).
- 8.7 The proposed classroom building that is now before the Board is unrelated to the existing temporary secondary school operations at All Hallows. The proposed classroom building subject of this application relates to a new primary school for Gracepark Educate Together National School. It is a temporary solution while the numbers of the new primary school build up and it is stated that a new purpose-built national school is being planned and designed for a site within All Hallows, it will be subject of planning application in the near future. It is stated in the response to the grounds of appeal that the Department of Education and Skills is liaising with DCC and DCU (who

are now the owners of All Hallows) in relation to a masterplan for the campus. It is planned that the temporary accommodation for the school would be removed by September 2018, at which point it is envisaged that the school will move into its permanent accommodation.

- 8.8 Having regard to the clarification submitted by the Department of Education and Skills in their response to the grounds of appeal concerning the use of the existing prefabs on the site and the proposed use of the prefab that is the subject of this application, I am of the opinion that, in the circumstances and given the stated need of the classroom building, a refusal on the grounds of impact on the architectural heritage and visual amenity of the area is unwarranted. The development description clearly states that the subject prefab is for a period of 2 years. The prefabricated structure can be easily removed, therefore, in terms of architectural heritage impact, it is reversible. The prefab is a remove from the historic buildings on the site, there are no physical works proposed to any of the existing buildings or structures in the curtilage. I concur with the applicant's 'Architectural Heritage Assessment Report' submitted with the application where it states that the proposed development due to its temporary nature, does not incur a permanent disproportionate loss, physical degradation, damage or destruction of surviving historic fabric. The development does not contribute to the demise of the architectural character of the protected structures on a permanent basis.

Set-down area and car parking

- 8.9 The appellant states that there are no measures to include for appropriate set-down areas for student drop-off, and additional car parking for staff.
- 8.10 It is proposed to utilise the existing entrance off the Gracepark Road serving the campus to access the site that is located within this campus, no new vehicular entrance or roadways are proposed here. There is a large surface car park located immediately to the west of the application site. It is proposed to use this car parking area to cater for the additional vehicular traffic associated with the proposed development (ref: 'Hardstanding & Watermain Layout', drg no. 16.118-103 submitted with the application). I note there is also surface car parking at other locations in the campus. It is also proposed to construct a footpath around the proposed classroom building and connect this to the existing footpath immediately to the west of the site. Bicycle and scooter parking is also being proposed adjacent the building. The pedestrian and vehicular access proposals are outlined in Section 5 'Roads and Traffic' of the report prepared for the applicant by Jason Redmond & Associates Consulting Engineers submitted with the application. That report holds that, based on a survey of existing usage and capacity, the car park adjacent the site has considerable spare capacity to serve the proposed development. It also notes that most of the students attending the school will live within a 600 m radius of the school, that report states that the internal road network will be

sufficient to allow for access to the school for all road users. The 'Roads Streets & Traffic Department' of the p.a. in its report of the 16/06/2016, having considered the proposed access and car parking, indicated no objection to the development.

- 8.11 It is indicated that the proposed structure will accommodate a maximum of 56 children, but in its first year of operation will accommodate only 28. Given the limited number of pupils being accommodated and the limited staffing requirements, the associated trip generation cannot be considered excessive. For the scale of development proposed, the car parking, bicycle and pedestrian facilities appear reasonable. The school is utilising an existing entrance off the public road, the car park/set-down area has sufficient capacity and is located well away from the public road within the campus. Many of the pupils will be within walking distance of the school and the footpath network along the public roads and streets in the area is good. I do not consider that the proposed development poses an unacceptable risk to pedestrian or motorist safety.

Other legal codes

- 8.12 The appellant holds that the proposed structure does not comply with the Building Regulations, the appellant cites Parts B, L and M of the Building Regulations in particular.
- 8.13 In response to the grounds of appeal the applicant states that this type of building is used regularly for this purpose and complies with all the various Building Regulations.
- 8.14 The Board is restricted to considering the proper planning and sustainable development of the area having regard to specific issues as laid out in s.34(2)(a)(i)-(vi) of the Planning & Development Act 2000 (as amended). Even if permission is granted, the applicant has responsibilities under other separate legal codes, such as compliance with the Building Regulations. This assessment and recommendation to the Board relates solely to considerations pertaining to the proper planning and sustainable development of the area, it does not assess compliance with other legal codes. A grant of permission in itself does not of course exempt compliance with those other codes, a grant of permission does not in itself permit a person to carry out any development, the Board will be aware of the provisions of s.34(13) of the Planning & Development Act 2000 (as amended) that states: "A person shall not be entitled solely by reason of a permission under this section to carry out any development."
- 8.15 I therefore would not recommend refusal in relation to this issue.

Flood Risk

- 8.16 The River Tolka is located some 600 m south-west of the site. Section 2.4 of the report by Jason Redmond & Associates Consulting Engineers submitted with the application states that the Tolka has been subject to flooding in the area. However, citing the OPW flood maps, that report indicates that no flood events have been recorded on the site. It concludes that the risk of flooding to the proposed development is minimal. There is nothing on file to contest this conclusion, flood risk was not raised in the grounds of appeal.

Impact on trees

- 8.17 In their decision to grant permission the p.a. sought the relocation of the structure further west on site primarily to minimise the potential impact on the existing trees along the eastern boundary. In the response to the grounds of appeal the applicant indicated no objection to any of the conditions applied to the p.a. decision. In the event of a grant of permission I would recommend that the Board condition final site layout to be agreed with the p.a. prior to the commencement of development.
- 8.18 The Planner's Report also referred to the applicant being advised through the planning application process that there would be concerns in respect of locating the temporary school in a tree belt from the point of view of the potential impact on trees and in respect of general safety issues. The p.a. decision went on to condition that the trees in the vicinity of the site be retained unless otherwise agreed with the p.a. The condition sought the involvement of an arborist in the development works. In the response to the grounds of appeal the applicant has stated that it has made arrangements to ensure that all conditions as applied by the p.a. would be implemented, including employing an arborist to oversee works to install the temporary accommodation. In the event of a grant of permission I would recommend a similar condition, the condition should seek the retention of all trees where practicable to allow for the removal of some trees if required for safety (or other) reasons to the satisfaction of the p.a.

Appropriate Assessment

- 8.19 The application was accompanied by an Appropriate Assessment Screening Report as prepared by Kingfisher Environmental Consultants (received by the p.a. on the 04/05/16). That report concluded that the no significant adverse effects are expected to arise to any Natura 2000 sites from the proposed development. It further concluded that the project can be screened out of further stages of Appropriate Assessment and may proceed.
- 8.20 Having regard to the nature and scale of the development proposed and to the nature of the receiving environment, namely an urban and fully serviced location, I consider that no appropriate assessment issues arise.

9.0 CONCLUSIONS AND RECOMMENDATION

I recommend that the Board uphold the planning authority's decision and grant permission for the proposed development subject to the conditions as indicated below.

REASONS AND CONSIDERATIONS

Having regard to the land use zoning objective for the area, the established land use on the associated holding, and also having regard to the temporary nature of the development proposed, it is considered that, subject to compliance with conditions below, the proposed development would not seriously injure the amenities of the area or of property in the vicinity, would not adversely impact on the architectural heritage of All Hallows campus, would not be prejudicial to public health, and would be acceptable in terms of traffic safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

CONDITIONS

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. This permission shall apply for a period of two years from the date of this order. The primary school structure shall then be removed unless, prior to the end of the period, planning permission shall have been granted for its retention for a further period. The site shall be reinstated on removal of the primary school structure. Details relating to the removal and reinstatement shall be submitted to, and agreed in writing with, the planning authority at least one month before the date of expiry of this permission.

Reason: In the interests of clarity, architectural heritage protection and the proper planning and sustainable development of the area.

3. The primary school structure shall be located further west on the site to the satisfaction of the planning authority. Prior to the commencement of development, the applicant shall submit to, and agree in writing with, the planning authority an amended site layout plan at a scale of not less than 1:200 indicating compliance with this condition.

Reason: To minimise the potential impact on existing trees in the vicinity of the site.

4. Existing mature and semi-mature trees on and adjacent the site shall be retained where practicable to the satisfaction of the planning authority. Prior to the commencement of development, the applicant shall submit to, and agree in writing with, the planning authority a report as prepared by a suitably qualified person indicating proposals in relation to the trees in and adjacent the site. This report shall indicate, *inter alia*, tree protection measures for the construction period.

Reason: To protect the existing trees, landscape and the visual amenities of All Hallows.

5. The internal road network serving the proposed development including turning bays, junctions, parking areas, footpaths and kerbs shall comply with the detailed standards of the planning authority for such road works.

Reason: In the interests of amenity and of traffic and pedestrian safety.

6. Water supply and drainage arrangements, including the disposal of surface water, shall comply with the requirements of the planning authority for such works.

Reason: To ensure adequate servicing of the development, and to prevent pollution.

7. The developer shall facilitate the archaeological appraisal of the site and shall provide for the preservation, recording and protection of archaeological materials or features which may exist within the site. In this regard, the developer shall:

(a) notify the planning authority in writing at least four weeks prior to the commencement of any site operation (including hydrological and geotechnical investigations) relating to the proposed development, and

(b) employ a suitably-qualified archaeologist prior to the commencement of development. The archaeologist shall assess the site and monitor all site development works.

The assessment shall address the following issues:

- (i) the nature and location of archaeological material on the site, and
- (ii) the impact of the proposed development on such archaeological material.

A report, containing the results of the assessment, shall be submitted to the planning authority and, arising from this assessment, the developer shall agree in writing with the planning authority details regarding any further archaeological requirements (including, if necessary, archaeological excavation) prior to commencement of construction works.

In default of agreement on any of these requirements, the matter shall be referred to An Bord Pleanála for determination.

Reason: In order to conserve the archaeological heritage of the area and to secure the preservation (in-situ or by record) and protection of any archaeological remains that may exist within the site.

Tom Rabbette
Senior Planning Inspector
26th October 2016