



An
Bord
Pleanála

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

Inspector's Report on Recommended Opinion ABP-301257-18.

Strategic Housing Development	Demolition of existing building and construction of 111 residential units and associated site works.
Location	Lands to west of the Enfield Relief Road, Enfield, Co. Meath
Planning Authority	Meath County Council
Prospective Applicant	Legendstar Ltd
Date of Consultation Meeting	30 th April 2018
Date of Site Inspection	19 th April 2018
Inspector	Una Crosse

1.0 Introduction

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

The site, which is 3.84 hectares in area, is located to the east of Enfield town centre and west of the relief road which has been constructed around the south of the town. The irregularly shaped site is located to the south of an existing residential development of recent construction known as Royal Oaks from where it is proposed to access the proposed site. The site also addresses a minor county road to the west of the site, referred to as 'New Road' which is accessible from both the relief road and the Dublin Road and which is addressed by a number of one off houses. There are soccer pitches to the west of the site. The site is relatively flat and there is an agricultural building of c.95 sq.m on the site which it is proposed to demolish.

3.0 Proposed Strategic Housing Development

The proposed strategic housing development comprises **111** units as follows:

- 14 two-bed apartments
- 14 three-bed duplex units
- 56 three-bed houses – 8 terrace, 48 semi-detached
- 27 four-bed houses – 1 detached, 26 semi-detached.

The housing mix comprises:

- 1 bed units – 0%
- 2-bed units – 12.6%
- 3- bed units – 63%
- 4-bed units – 24.4%
- It is proposed to provide 219 car parking spaces based on 2 spaces per 3 bed unit + and 1.25 spaces for 2-bed units with 7 visitor spaces for apartments.
- A total of 5,716 sq.m of public open space is proposed.
- Part V provision is 11 units – 5 two-bed apartments, 2 three-bed duplex units and 4 three-bed mid terrace units.
- Vehicular access is proposed via the existing Royal Oaks housing development with pedestrian/cycle access routes proposed at two locations along the Relief Road and at one location on New Road.
- The development has a stated density of 29.2 per hectare based on a net developable area of 3.79 hectares (0.048 ha excluded).
- Irish Water have stated that the proposed connection to the network can be facilitated however they state in relation to water that additional water wells would need to be developed to cater for the proposal and that these works are not currently on the existing Irish Water capital investment programme.

4.0 **Planning History**

There is no history on the site but the following is an outline of the history pertaining to the existing scheme on the adjoining site.

Ref. TA150871 – Permission granted for 44 units (30 three-bed semi-detached, 12 four-bed semi-detached and 2 four-bed detached), new vehicular entrance on a site of 6.26 hectares.

A range of amending permissions, principally to house types, have been sought to the development which have been permitted.

5.0 National and Local Planning Policy

5.1 National Planning Framework

The recently published National Planning Framework includes a specific Chapter, No. 6, entitled 'People Homes and Communities'. It 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 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.

5.2 Section 28 Ministerial Guidelines

Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submissions 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')
- Design Manual for Urban Roads and Streets'
- Sustainable Urban Housing: Design Standards for New Apartments (2018)
- Childcare Facilities – Guidelines for Planning Authorities
- Architectural Heritage Protection – Guidelines for Planning Authorities.
- The Planning System and Flood Risk Management (including associated Technical Appendices).

5.2 Statutory Plan for the area

The relevant plan for the area is the Meath County Development Plan 2013-2019 which is in force until January 2019. Enfield is specifically addressed in Volume 5 of

the CDP with a written statement provided for same. A Land Use Zoning Objectives Map is included in Volume 5 (book of maps) with the Enfield map outlining that the site is zoned A2 new residential within Phase II release (post 2019). A strip of land adjoining the Soccer Club to the north is zoned open space. Section 4 refers to residential development which notes a population increase of 566 persons to 2929 between 1996 and 2011. It notes that the core strategy seeks to limit the further expansion of the town at a more moderate rate with a household allocation of c. 319 dwellings proposed. The average density set down for Enfield in the CDP is 25 units per hectare with a requirement for 12.8 hectares required to satisfy the household allocation. Lands identified for Phase 1 followed the application of the sequential approach. It is noted that new entrances onto the Enfield Outer Relief Road will be resisted. A design statement is required to accompany applications for multiple housing developments.

The site appears to correspond to Site H identified in Table 1 of the evaluation of residential lands, described as 'land to the east and south of Enfield Celtic football Club having an area of 6.84 hectares. The proposed yield is 171 units at a density of 25 units per hectare. The site has a ranking of 9 as set out in Table 2 which provides an evaluation of the lands under a number of criteria. Policies related to water supply and wastewater services are included in Policy WWS POL2 which seeks to expedite the provision of the new waste water scheme and of an adequate water supply to allow development to proceed. Land Use policy LU POL 2 regards the Relief Road as the southern boundary of the town of Enfield and seeks to protect the strategic function of this road. Movement policy MA POL 1 & 2 seeks to support the improvement of existing rail infrastructure with increased suburban services to Enfield and Kilcock and seeks to encourage Iarnrod Eireann to extend the commuter train service to Enfield.

6.0 **Forming of the Opinion**

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.

6.1 Documentation Submitted

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, a Completed Application Form, Cover Letter including schedules, details of Part V, letter of consent from MCC, minutes of meetings with MCC and Irish Water COF, Statement of Consistency, A3 booklet of Architectural, engineering and Landscape Drawings, Architectural Drawings, Engineering Drawings, Architectural Design Statement, Engineering Assessment Report, Flood Risk Assessment, EIA Screening Report, AA Screening Report, Landscape Design Strategy, Arboricultural Assessment including Drawings, Cultural Heritage Assessment, Report on Archaeological Testing, Enfield Housing Market Report.

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:

- Most of the site is zoned for residential use (3.7 ha) with an area of 0.084 zoned open space and remainder (0.048 ha) unzoned but included for drainage and pedestrian link proposals.
- Residential zoning as Phase II which is post 2019 which is referenced as meaning post 22 January 2019 when the current Plan expires with development not likely to take place prior to that date allowing for compliance etc;
- Lands zoned open space represent 2.2% of the site (0.0843ha) and while zoned, not used as open space but is currently waste ground with a total of 5,716 sq.m of public open space proposed including zoned area with the loss of the small

area of open space not considered material with 11,999 sq.m of open space between existing and proposed phases of development.

- Density requirement different for edge of centre and edge of small town with reference to peripheral and/or less accessible urban locations as set out in the Apartment Guidelines with development proposed as a natural extension of the Royal Oaks development and given character of area and housing market where there is a greater demand for family homes, 29 units per hectare is considered an efficient and balanced density;
- Report on housing and demand in Enfield notes demand for predominately 3 bed units with some 4 beds;
- Proposed site is accessed via phase 1 which can accommodate same with no material adverse impact on any of the junctions modelled in the TIA with proposal informed by DMURS;
- Proposed to divert the constructed network for Phase 1 connect in to new proposal and discharge to the existing 225mm diameter sewer to the west of the site on the New Road. Upgrade works are required to the WWTP with connection completed after completion 2010/2021 with interim solution to install a temporary treatment system
- Correspondence (21/Dec/18*) enclosed from Irish Water notes that in relation to water, additional groundwater wells would need to be developed to cater for the proposed development and these works are not currently on the existing IW capital investment programme;
- Further correspondence (3/Jan/18) notes same stating that IW does not currently have any plans to carry out the works required to provide the necessary upgrades and capacity. They continue by stating that if you wish to have such works progressed that IW will require the provision of a contribution of a relevant portion of the costs for the required upgrades. It states in relation to wastewater that upgrade works are required to increase capacity of Enfield WWTP and IW currently has a project on current investment plan to provide the necessary upgrade and capacity which is scheduled to be completed by 2020/2021 (subject to change) and proposed connection could be completed as soon as possible after this date.

- In relation to foul water, Engineering Assessment report it states that it is proposed to divert a section of the existing foul network serving phase 1 and connect to new proposed foul layout and discharge into the existing 225mm foul sewer running along New Road. It is stated that Irish Water have confirmed that a package treatment plant can be provided on site to a 20/30 standard and this treated effluent can be discharged to the existing network. Waterman Moylan Drwg P125 shows the proposed location of the temporary treatment plan to the west of the site adjoining New Road at a location where two units are proposed to be located after completion of the WWTP upgrade;
- In relation to water supply Engineering Assessment report states that proposed to connect watermain into recently constructed watermain network serving Phase 1 and connect into existing 150mm watermain line running along the New Road to west of the site. Irish Water have advised of problems with supply and are investigating options to improve supply and advised that in interim that the provision of a temporary well on site would be acceptable to them. Waterman Moylan Drwg P126 shows location of proposed groundwater boring well and treatment plant to the east of the site along the boundary with the Relief Road within the proposed open space.
- In terms of surface water it is proposed that surface water from the site will drain via gravity and discharge at a restricted rate (3.1l/s) into the existing culverted surface water network to south of the site with flow restriction achieved by means of hydrobrake or similar installed at downstream manholes at each attenuation tank.
- The nearest European site (River Boyne and River Blackwater SAC and SPA is 11km as the crow flies and given significant separation no impacts envisaged;
- EIA screening report states EIA not mandatory and sub-threshold not required;
- Site in flood risk zone C with land use suitable with risks and consequences of flooding mitigated across the development with residual risk either low or negligible for each source;

- Archaeological testing undertaken in February 2018 with nothing of archaeological significance noted with the potential noted as low and no further mitigation is recommended.
- Architects design statement outlines the site context and the design evolution;
- Cultural heritage assessment (dated January 2018) recommends in its mitigation measures that programme of Archaeological testing is undertaken in advance of construction;
- Arboricultural assessment identifies trees and hedging on site and root protection areas identified for the trees to be retained;
- Noted that site is located 835m from nearest bus stop in town centre with train station 1.5km. Enfield is served by Bus Eireann, Citylink and Kearns bus services with 7 routes in total to Dublin City Centre and 18 Irish Rail daily departures to Dublin City Centre with 9 return services.
- Reference to statement in Apartment guidelines to peripheral and or less accessible urban locations (3) states that these locations are generally suitable for limited very small-scale higher density development that may wholly comprises departments or residential development of any scale that will include a minority of apartments at low –medium density <45 dwellings per hectare net.

6.2 Planning Authority Submission

A submission was received by An Bord Pleanála on the 17th of April 2018 from Meath County Council. The ‘opinion’ of the planning authority included, inter alia, the following:

- The submission outlines the development proposal, the section 247 meeting, a site description, planning history and planning policy pertaining on the site.
- Enfield currently designated as a small town but under Variation No. 3 of the CDP intended to advance status to a Moderate Sustainable Growth Town given its important locational advantages, rail station and M4;
- Core strategy envisages need for 319 units to meet population growth in the settlement up to 2019 with 54 constructed to date;

- PA precluded from consideration of Phase 2 (post 2019) lands within the current Plan period;
- ABP advised that new Draft Meath CDP (2019-2025) expected to be published mid-2018 with proposal to move lands on subject site to Phase 1 release;
- Net density of 28.8 units considered appropriate at edge of town location;
- Proposed design, finishes, siting and density considered consistent with character of the area and existing development to the north;
- Minimum of 15% public open space required with proposed open space well supervised and laid out to serve the proposal but concern at location of side car parking spaces along open space areas hindering full usability;
- ABP requested to apply a condition requiring compliance in relation to boundary treatment;
- Proposals submitted in any SHD application must comply with the Meath CDP;
- Rear boundary walls and screen walls should comprise 2m high capped walls;
- Recommend ABP refer proposal to TII for comments;
- Layout facilitates access to third party lands to the south of proposal;
- Service vehicles required to reverse onto public open space to facilitate turning movements to front of units 68 & 69 and should be amended with access to houses 11, 68 and 83 restricted and should be reviewed;
- Adequate sightlines required from all dwellings and noted car parking in accordance with CDP with applicant requested to ensure adequate access and sightlines for all car parking spaces with proposed parking for unit 34 in front of unit 33 undesirable;
- Vehicle priority to be identified at access junctions, footpaths to be minimum 2m and 3m for shared;
- Public lighting conditions recommended;
- Recommend ABP consult with Irish Water with IW indicating in letter to applicant that additional ground water wells required but not on existing capital investment programme;

- Currently very limited spare capacity in Enfield Water supply scheme with pre-connection enquiries recently processed for a number of proposed large scale developments and current water supply arrangements not sufficient to meet needs of lands subject of pre-connection enquiries and committed development;
- Expansion of WSS required but IW have no plans to undertake expansion works with applicant invited to engage with IW regarding a financial contribution towards expansion works but no indication from applicant or IW of any agreement;
- Applicant proposes a borehole on the site as a temporary solution to water supply deficit and suggest IW agreeable however IW advised MCC that no agreement was given as such would fall outside IW remit and no information provided by applicant to support viability of onsite proposal with extensive information required;
- Section 7.13 of CDP refers to temporary onsite infrastructure with no assurance provided of a permanent capital expansion by IW with no plans for a definite capital investment plan to undertake expansion;
- Similar to water supply, currently limited spare capacity in wastewater treatment plant with insufficient capacity to meet needs of proposed and other developments in Enfield;
- IW indicate upgrade works required to increase capacity with a project on current invest plan for 2017-2021 to provide upgrade;
- In order to consider a temporary plant, MCC require confirmation from IW of timeline for delivery of upgrade works and until date for such upgrade works provided MCC do not consider an onsite solution is acceptable;
- Detailed calculations required for sizing of each attenuation system and details of the proposed attenuation system and overflow basins required;
- Investigation required of existing surface water drainage network and capacity within same with applicant to undertake any remedial works required;
- Detail section of location and depth of existing surface water drainage pipe from adjacent soccer field relative to proposed dwellings;

- Details required in relation to bin storage and details of emission from site during construction stage in addition to details of waste streams generated with conditions proposed;
- Part V and Taking in charge requirements outlined;
- Recommend ABP refer proposal to DAU (archaeology), report notes nothing of archaeological significance noted and condition attached;
- No proposed childcare facility with two crèches in Enfield having capacity for 35 spaces and noted no correspondence from Meath County Childcare Committee with ABP requested to refer proposed to this committee given its size;
- Art work required (developments over 75 units) with type of art work to be agreed with MCC Arts Office, estate name to be agreed and condition regarding broadband outlined;
- ABP requested to refer proposal to OPW in relation to flood risk management and NPWS in relation to AA with nearest European site located c.18km to the east;

6.3 Consultation Meeting

A Section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 30th April 2018, commencing at 11.00 AM. 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.

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

- Settlement Status, Phasing and Zoning
- Development strategy including density, housing mix and layout/open space
- Water Supply and Wastewater Treatment
- Surface Water and SuDS
- Archaeology
- Any other matters

- In relation to Settlement Status, Phasing and Zoning An Bord Pleanála sought further elaboration/discussion/consideration of the following: the settlement status of Enfield in the County Plan and proposed variation No. 3, the proposed publication of the draft County Development Plan and possible extension of the existing County Development Plan beyond January 2019 and considerations related to the Phase II lands and the rationale for the open space zoning on the strip of land adjoining the soccer club.
- In relation to Development strategy including density, housing mix and layout/open space An Bord Pleanála sought further elaboration/discussion/consideration of the following: the density of the proposed development having regard to proposed changes to the settlement status of Enfield and the locational advantages offered by the train service, the high proportion of 3 & 4 bed semi-detached units proposed, the layout of the proposal vis a vis the creation of an urban edge along the relief road, creation of connections and good quality open spaces and pedestrian connections from the site to the town centre via New Road.
- In relation to Water Supply and Wastewater Treatment An Bord Pleanála sought further elaboration/discussion/consideration of the following: the existing capacity of the water supply and foul water systems and the proposals to upgrade same having regard specifically to proposed upgrades and the requirement to secure consent for same, the proposed temporary interim solutions for both and the taking in charge considerations surrounding same.
- In relation to Surface Water and SuDS An Bord Pleanála sought further elaboration/discussion/consideration of the following: the proposed storm water management network proposed and the provision of additional SuDS measures on the site.
- In relation to Archaeology An Bord Pleanála sought further elaboration/discussion/consideration of the following: the pre-testing undertaken and the comments sought from the National Monuments Services.
- In relation to any other matters An Bord Pleanála sought further elaboration/discussion/consideration of the following: the settlement status of the town in the context of Variation No. 3 and Part V.

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 301257' 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**

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.

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.

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: infrastructure constraints, residential phasing and density, layout, unit mix which are set out in the Recommended Opinion below.

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.

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

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.

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.

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:

Infrastructural Constraints

1. Further consideration/clarification of the documents as they relate to both water supply and wastewater infrastructure constraints in the network serving the proposed development. The documentation at application stage should clearly indicate the nature of the constraints, the proposals to address the constraints, whether such constraints require statutory consent and/or may be subject to a compulsory purchase process and if such consent has been received or CPO completed, who is going to undertake the works required and the timelines involved in addressing these constraints relative to the construction and completion of the proposed development. (The prospective applicant may wish to satisfy themselves that an application is not premature having regard to the information sought above).

Residential Phase 2 Lands

2. Further consideration of the documents as they relate to the zoning of the site for Phase 2 residential. This consideration, including a justification for any application for development, should have regard to, inter alia, the Meath County Development Plan 2013 – 2019 as it relates to the phasing of residential development and, in particular, the quantum and location of Phase 1 lands within the above mentioned plan area which remain undeveloped. This consideration and justification should also have regard to, inter alia, the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009) as it relates to the sequential approach and phasing.

Density

3. Further consideration of documents as they relate to the density in the proposed development, specifically in relation to the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009) as they refer to edge of centre sites. Particular regard should be had to the need to develop at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage given the proximity of the site to the existing rail connections and to established social and community services in the immediate vicinity. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating to density and layout of the proposed development.

Design, Layout and Unit Mix

4. Further consideration of documents as they relate to the layout of the proposed development particularly in relation to the 12 criteria set out in the Urban Design Manual which accompanies the above mentioned Guidelines and the Design Manual for Urban Roads and Streets. In addition to density which is addressed above, the matters of unit mix, the configuration of the layout particularly as it relates to the Relief Road and the creation of a high quality open spaces should be given further consideration. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

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. 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.
2. Details of all materials proposed for the proposed buildings, open spaces, paved areas, boundary and retaining walls.
3. A full and complete drawing that details all boundary treatments.
4. A plan of the proposed open space within the site clearly delineating public, semi-private and private spaces.
5. A detailed phasing plan for the proposed development should be provided.
6. A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority.

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. Transport Infrastructure Ireland
2. National Transport Authority
3. Minister for Culture, Heritage and the Gaeltacht (archaeology and nature conservation)
4. Heritage Council (archaeology and nature conservation)
5. An Taisce — the National Trust for Ireland (archaeology and nature conservation)
6. Irish Water
7. Meath County Childcare Committee

PLEASE NOTE:

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.

Una Crosse

Senior Planning Inspector

May 2018