



An
Bord
Pleanála

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

Inspector's Report on Recommended Opinion ABP-301733-18

Strategic Housing Development	101 apartments in 3 blocks (social housing units)
Location	High Park, Grace Park Road, Drumcondra, Dublin 9.
Planning Authority	Dublin City Council
Prospective Applicant	Respond Housing
Date of Consultation Meeting	5 th July 2018
Date of Site Inspection	20 th June 2018
Inspector	Sarah Moran

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 site is located in the established suburban area of Drumcondra, c. 4.5 km from Dublin City Centre. It is a former convent (High Park House) and church that are currently in institutional use as a 'family hub' providing accommodation for homeless families, also offices and community services, as operated by the Respond Housing Association. The housing association also have an office and associated facilities in a modern annex to the convent building. The site is a fragment of what was once a much larger institutional complex encompassing the lands at Grace Park Manor, Beechlawn nursing home and Highfield healthcare facility, originally High Park Estate, which has since been subdivided. The development site has a stated area of 2.142 ha. The site to the immediate south (0.0287 ha), Martanna House, is also owned by the Respond Housing Association but is not included in the red line site boundary. The development site is currently accessed via the Martanna House entrance from Grace Park Road, leading to a tree lined avenue to the convent buildings. There is a substantial amount of mature deciduous trees in front of the convent buildings and around the church. The area to the rear of the convent is currently in use as a surface car park but a play area is currently under construction at this location. There are also mature trees along the boundary shared with Highfield healthcare facility to the immediate west.
- 2.2. The immediate surroundings of the site are as follows:

- Martanna House to the south. The original structure has been demolished and the area is currently being developed as 8 social housing apartments for older persons, as permitted under reg. ref. 2045/13.
 - Grace Park Manor apartment development to the south (4-6 stories), accessed from the Swords Road.
 - Bonnington (formerly Regency) hotel and car park to the south west, accessed from the Swords Road.
 - Highfield healthcare facility to the west, accessed from the Swords Road.
 - Beechlawn nursing home to the north, accessed from Grace Park Road.
 - Undeveloped lands to the north west, known as the 'Barina' site.
- 2.3. There is a protected structure at the site under the current Dublin City Development Plan, RPS ref. 3239, "*High Park Church and projecting portion of original convent buildings*".
- 2.4. The constraint area of Dublin Port Tunnel runs beneath the south western corner of the site.
- 2.5. There is a footpath along Grace Park Road in front of the site. There are no cycle lanes along this stretch of Grace Park Road at present.
- 2.6. There is a 750 mm storm drain running along the eastern site boundary, inside the Grace Park Road frontage.

3.0 Proposed Strategic Housing Development

- 3.1. The development comprises the addition of 3 no. 4 / 5 storey blocks to provide 101 new social housing apartments with underground car and cycle parking, ancillary open space and play areas and access from Grace Park Road. The social housing is to be managed by the applicant Respond, an Approved Housing Body. The development is to operate as a campus, with the proposed housing to use the communal facilities currently available in the existing buildings at the site. The housing agency offices and associated facilities are also to be retained. The open spaces are to operate as a shared parkland space to serve the residential development, with certain areas accessible to the public.

3.2. The proposed housing mix is as follows:

Unit Type	No. of Units	Bedspaces
1 bed	39	78
2 bed	36	128
3 bed	26	130
Total	101	336

This mix is on foot of discussions with Dublin City Council Housing Department with regard to housing need. The stated residential density is 47 units/ha. The apartments are provided in 3 no. 4/5 storey blocks as follows:

- Block A adjacent to the Grace Park Road access. 4/5 storey height. 43 apartments.
- Block B in front of the convent building and close to the converted church. 3/5 storey height. 31 apartments.
- Block C to the rear of the convent building. 3/4 storey. 31 apartments.

3.3. The development also includes the following:

- New vehicle / pedestrian / cycle access to Grace Park Road at the northern end of the site, serving the basement car parks and the Respond offices and community facilities. This is to be laid out as a priority junction. Existing access via Martanna House to be used for pedestrian / cycle access only with a lockable gate open to the public during daylight hours. This is generally the same arrangement as previously permitted under PL29N.237222. Potential key pad access to adjoining sites at the Bonnington Hotel to the west and the Barina site to the north to create access to the Swords Road QBC via 3rd party lands.
- Underground car parking in 2 separate basement car parks, total of 140 no. car parking spaces. Car park below Blocks A and B with 92 spaces, parking for residents, staff and users of community facilities. Separate external pedestrian access for visitors and staff via a dedicated stair and lift emerging in the vicinity of the reception area. Car park below Block C with 44 spaces for residents only. Removal of existing surface car park in front of the convent building and creation

of a new surface piazza with set down area including 4 no. surface car parking spaces, all disabled accessible. Also motorcycle parking in the basement car park.

- 120 no. cycle parking spaces, some at basement level and some at surface level.
- Refuse storage areas in the underground car parks.
- Maximum height of the buildings < 2m lower than the ridge height of High Park House.
- Over 50% of the site to remain as open parklands / grounds. Relocation of existing access avenue from Grace Park Road to create a public open space with play area between Blocks A and B and the Grace Park Road frontage. The layout of the area to the rear of the convent building includes a linear park with a previously permitted play area that is currently under construction. Community garden with allotments to the south of the church and Block B.
- Tree retention, tree protection measures and landscaping. Over 75 new trees to be planted.
- Surface water management with outflow restricted to GSDS recommended maximum outflow to the public storm drain at the Grace Park Road frontage. Water from basement car parks to be pumped to a petrol interceptor. SUDS measures. Wastewater disposal to public mains in accordance with Dublin City Council requirements. Water supply via public main, the applicant has submitted confirmation of feasibility correspondence from Irish Water.

3.4. The development does not include a child care facility. A statement of rationale for same is submitted.

3.5. The development is to be exempt from Part V requirements as it is social housing, relevant correspondence from Dublin City Council is submitted.

4.0 **Planning History**

4.1. 4050/09 PL29N.237222 Subject Site and Martanna House

Permission sought for the demolition of the Martanna House building and derelict buildings to the side and rear of the former convent and the construction of 150 no.

apartments and a Day Centre facility in 5 no. 3-5 storey blocks with 168 no. car parking spaces; new stairs & lift at south wing of existing convent building; new single storey glass conservatory connecting the existing church and convent building; redevelopment of the existing former church as a communal facility; new boundary treatment to Grace Park Road, the redevelopment of the existing site entrance at Martanna House and the construction of a new separate entrance at Grace Park Road. The Board granted permission subject to the omission of Blocks A and B and the omission of part of Block C, therefore permission was granted for 85 apartments in the 5 storey Blocks C, D and E. The only elements of this permission carried out were demolition of ancillary structures and a fire damaged rear wing of the convent; the conversion of the church to a communal facility and the replacement of part of the high convent wall along Grace Park Road with a low wall and railings.

4.2. 3186/17 Subject Site

Respond did not carry out the residential blocks C, D, and E as permitted under PL29N.237222. They applied for an extension of duration of that permission in 2015, however this was refused by Dublin City Council as its height at 5 stories exceeded a height restriction of 13.5m under the then current 2011-2017 City Development Plan, which had been introduced into the development plan since the original grant. This application relates to the retention of the communal facility (former church) and link structure connecting High Park House to former church. It was submitted by Respond in order to regularise the constructed parts of PL29N.237222 in advance of the current proposal.

4.3. 2045/13 Martanna House

Permission granted to demolish Martanna House hostel and construct a 2 storey building containing 8 no. social housing apartments for older persons at the site immediately adjoining to the south on Grace Park Road. Construction has commenced with completion expected by the end of 2018.

5.0 National and Local Planning Policy

5.1. Section 28 Ministerial Guidelines

5.1.1. 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 section 28 Ministerial Guidelines and other national policy documents are:

- ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ (including the associated ‘Urban Design Manual’)
- ‘Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities’ (March 2018)
- ‘Design Manual for Urban Roads and Streets’
- ‘The Architectural Heritage Protection Guidelines for Planning Authorities’
- ‘Childcare Facilities Guidelines for Planning Authorities’
- ‘Framework and Principles for the Protection of the Archaeological Heritage’

5.2. Dublin City Development Plan 2016-2022

5.2.1. The site has the standard residential zoning objective ‘Z1 – To protect, provide and improve residential amenities’.

5.2.2. Housing policy QH4:

“To support proposals from the Housing Authority and other approved housing bodies and voluntary housing bodies in appropriate locations subject to the provisions of the development plan.”

5.2.3. Development plan section 8.5.10 Dublin Port Tunnel. Policy MT22:

“To require the submission of a Development Assessment for all development proposals located in the vicinity of both Dublin Port Tunnel, the proposed DART Underground protected corridor, or any proposed public transport tunnel. Detailed requirements for Dublin Port Tunnel are set out in Appendix 6, and Iarnrod Eireann should be consulted in relation to heavy rail.”

5.2.4. Development plan section 11.1.5.3 on protected structures.

- 5.2.5. Chapter 16 development standards. The following are noted in particular:
- 16.3.3 10% public open space requirement for all residential schemes.
 - 16.4 density standards. No maximum density. Target of 100 units / ha in the Housing Strategy.
 - 16.5 plot ratio. Permissible plot ratio for Z1 outer city is 0.5 – 2.0.
 - 16.6 site coverage. Z1 indicative site coverage 45%-60%
 - 16.7 building height. The site is not located in an area designated as suitable for taller buildings, e.g. and LAP, SDZ or SDRA, therefore the 'low rise' category applies. A height limit of 16m applies for residential development in the outer city.

5.2.6. Development plan map J strategic transport and parking areas. The entire development site is within zone 3. Table 16.1 car parking standards:

- 1 space / 100 sq.m. GFA office space.
- 1.5 / dwelling
- 1 space / 10 bedspaces of Institutional Residential use
- 1 space / 2 dwellings sheltered housing

Table 16.2 cycle parking standards:

- 1 per residential unit all zones
- 1 space / 200 sq.m. offices.

6.0 Forming of the Opinion

6.1. 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 submissions 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, the following:

Completed application form; details of section 247 consultations with Dublin City Council; site location map; masterplan layout; design statement; drawings, sections and elevations of existing and proposed buildings; floor plans existing and proposed; boundary details; land use masterplan existing and proposed; photomontages; schedule of compliance with open space standards; landscaping proposals; tree constraints plan, impact assessment and protection plan; arboricultural report; details of drainage and water supply; flood risk assessment; Irish Water correspondence; AA screening report; environmental report; planning reports; childcare requirements report; architectural heritage impact assessment; daylight analysis and shadow study; impact assessment on Port Tunnel; archaeological impact assessment; transport impact assessment, Dublin Port Tunnel site assessment; Part V correspondence with Dublin City Council; community facilities audit; report on public consultation carried out by Respond.

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.

6.2.2. I have reviewed and considered all of the above mentioned documents and drawings.

6.3. Planning Authority Submission

6.3.1. In compliance with section 6(4)(b) of the 2016 Act the planning authority for the area in which the proposed development is located, Dublin City Council, submitted a copy of their section 247 consultations with the prospective applicant and also submitted their opinion in relation to the proposal. These were received by An Bord Pleanála on 26th June 2018. The submission includes a report by Dublin City Council Roads & Traffic Planning Division.

6.3.2. The planning authority's 'opinion' included the following matters:

- The development is permissible under the Z1 zoning objective. The principle of higher density development in an apartment format has been established at the site under the previous permission 4050/09 PL29N.237222.
- The proposed density is acceptable to the planning authority. The plot ratio, site coverage and height are in accordance with development plan standards.
- The planning authority considers that the internal floor areas of all apartments and the no. of apartments per core comply with the City Development Plan and with the 2018 apartment guidelines. Internal circulation areas are satisfactory. The applicant should ensure that the application complies with the 2018 ministerial guidelines.
- The proposed housing mix is acceptable and in accordance with the 2018 apartment guidelines, specifically SPPR1.
- The communal entrance point to Block B is recessed into the block, this could be redesigned with regard to the need to create a safe and welcoming entrance. Communal pedestrian entry points to Block C should be redesigned to incorporate highly visible and safe entry points with good illumination and cover over. The functioning of the pedestrian entry points to the rear of Block C is unclear. Entrances to the west elevation should be restricted to property management staff and residents of the ground floor apartments.
- The applicant should provide a photomontage image of development as viewed from the west and northwest of the site, i.e. the grounds of Highfield Hospital and from Grace Park Manor.
- No concerns stated regarding the private, public and communal open spaces.
- The submitted Daylight Analysis report shows that 4 of the 5 amenity areas meet the BRE guidelines for level of sunlight to amenity areas and that 1 does not, the location of a memorial garden. This is acceptable. A small minority of habitable rooms do not meet the required standard when the impact of mature trees on site is taken into account. The planning authority considers this acceptable in this instance with regard to development plan objectives to retain as many trees as possible and to the views of local residents regarding tree retention.

- There are 5 no. north facing single aspect apartments in Block A. The PA will only consider north facing units where they overlook a significant public amenity. The proposed apartments overlook an area of communal open space, basement access and car parking. The planning authority does not consider that this constitutes a significant public amenity. The aspect of these apartments is not considered acceptable and should be reconsidered.
- The childcare map provided indicates very few childcare facilities close to the development site. The majority of units in the scheme are 1 or 2 bed (62%). The 2018 apartment guidelines acknowledge that 1 and possible 2 bed units are not to be considered in the requirement for childcare facilities. The applicant should submit details of the assessment of Dublin Childcare Committee regarding the provision of childcare in the area.
- The submitted community audit does not demonstrate how the development will contribute to the range of community infrastructure, e.g. the use of the former church at the site as a communal facility. The applicant should provide details of same, also a map indicating walking distances to indicating the full range of social infrastructure in the area.
- The planning authority has no objection to the development in the context of the protected structure at the site with regard to the previous permission.
- The archaeological assessment should be revised to take account of the current proposal with basement car parks. The applicant shall facilitate an archaeological appraisal of the site prior to the commencement of development.
- A building lifecycle report should be included with the proposal.
- The drawings indicate possible pedestrian access points for residents subject to the consent of adjoining landowners at the south west and north west corners of the site. The planning authority welcomes these. The traffic assessment identifies potential linkages to Swords Road via the Bonnington Hotel and Barina site. These linkages would significantly reduce walking times to the QBC on the Swords Road and would be welcomed by the planning authority.
- The proposed vehicular access from Grace Park Road reflects the location permitted under 4050/09 PL29.327222. Insufficient details are provided regarding

the entry treatment from Grace Park Road, also visibility splays. Consideration should be given to the provision of a pedestrian route along the eastern side of the access road.

- Details of the structural impact assessment on the Port Tunnel to be submitted with the application should be agreed with TII.
- The planning authority has no objection to the level of car parking proposed. There are some anomalies in the application regarding the total no. of parking spaces, this should be clarified in the application. The layouts of the basement car parks should be clarified.
- The cycle parking provision is in accordance with development plan standards. The planning authority has no objection to the level, location and format of cycle parking provided.
- The submitted Transport Assessment assumes that 40% of trips from the development will be via sustainable modes. The planning authority is satisfied with the general scope, content and conclusions of the TA. Several minor anomalies are noted, which should be addressed in the TA submitted with the application. Full auto track drawings should be submitted with the application.

6.4. Submission of the National Monuments Service

- 6.4.1. The National Monuments Services notes that the submitted Archaeological Impact Assessment is dated 14th September 2012 and relates to a previous proposal for the development site, ref. PL29N.237222. It recommends than a revised Archaeological Impact Assessment be submitted with any application on the site.

6.5. Submission of Transport Infrastructure Ireland

- 6.5.1. The main points made may be summarised as follows:
- The development site is over part of the Dublin Port Tunnel reservation.
 - Refers to City Development Plan objective 8.5.10. The development part covers 'zones 1 and 2' of the tunnel and there the developer is required to submit structural civil engineering and groundwater assessment for review by TII as part of any application for consent.

- Due to time constraints, TII is unable to review the structural impact assessment submitted as part of the consultation documents.
- TII advises that this assessment is essential given the importance of the M50 Dublin Tunnel prior to any application being submitted.
- The submission notes the development permitted under PL29N.237222, comments that the proposed Block C generally coincides with the permitted Block E that appears to encroach upon zones 1 and 2 of the tunnel. The previously permitted block did not include a basement car park, as is currently proposed.

6.5.2. The submission notes the following deficiencies in the documentation submitted:

- The site layout plan does not indicate distances to boundaries or to the centre line of the Port Tunnel.
- The site survey does not contain topographical heights to the rear of the site.
- The basement layout for Blocks A, B and C indicates the FFL of Block C at 33.106. TII assume that all heights are relative to O.S. datum and thus indicate that the cut to form the basement will be >3m.

6.6. Consultation Meeting

6.6.1. A section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 5th July 2018. 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.

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

1. Residential density in the context of national and local planning policy.
2. Residential amenity, proposed and existing.
3. Urban design, public realm, interaction with the protected structure at the development site. Visual impacts to Grace Park Road. Tree retention and landscaping.
4. Traffic impacts. Vehicular, pedestrian and cycle connections. Car and cycle parking provision. Potential impacts on Dublin Port Tunnel.

5. Appropriate Assessment

6. Any Other Matters

6.6.3. In relation to residential density in the context of national and local planning policy, ABP representatives sought further elaboration / discussion on:

- Proposed density of 47 units / ha, potential for higher density given the location of the site close to the city centre, public transport connections and to a wide range of services and amenities and with regard to national policy as per the National Planning Framework and the apartment guidelines.

6.6.4. In relation to residential amenity, proposed and existing, ABP representatives sought further elaboration / discussion on:

- Permission already granted for the block to the rear of the convent building.
- Potential impacts on the hospital to the rear, also the nursing home to the north.
- Detailed comments of Dublin City Council regarding apartment design are noted.

6.6.5. In relation to urban design, public realm, interaction with the protected structure at the development site; visual impacts to Grace Park Road; tree retention and landscaping, ABP representatives sought further elaboration / discussion on:

- Interaction of basement construction with trees and landscaping at ground level.
- Consideration of impacts on the setting of the protected structure, with regard to the history of the overall demesne and convent site.

6.6.6. In relation to traffic impacts; vehicular, pedestrian and cycle connections; car and cycle parking provision; potential impacts on Dublin Port Tunnel, ABP representatives sought further elaboration / discussion on:

- Apartment guidelines, policy to minimise parking in central / accessible urban locations. Prospective applicant to consider the proposed provision in light of the performance related approach of the apartment guidelines.
- Dublin City Council opinion report requires further details of the entrance to Grace Park Road.
- TII comments r.e. potential impacts on Dublin Port Tunnel.

- 6.6.7. In relation to Appropriate Assessment, ABP representatives sought further elaboration / discussion on:
- The AA screening report submitted with the pre-application documentation considers sites within 10 km of the development. The AA guidelines recommend a radius of 15 km. 10 km may be reasonable at this urban location, however justification should be provided in the screening submitted.
- 6.6.8. In relation to Any Other Matters, ABP representatives sought further elaboration / discussion on:
- Childcare, any liaison with the Dublin City Childcare Committee.
 - Revised archaeological assessment to take account of basement car parks.
- 6.7. Both the prospective applicant and the planning authority were given an opportunity comment and respond to the issues raised by the representatives of ABP. Those comments and responses are recorded in the 'Record of Meeting ABP-301733-18' 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 section 28 Ministerial Guidelines, and local policy, via the statutory development 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 element:

Residential density

details of which are set out in the Recommended Opinion below.

- 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 issue needs 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:

Residential Density

Further consideration of the documents as they relate to the residential density of the proposed development. This consideration and justification should have regard to, inter alia, the minimum densities provided for in the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas', the updated 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities', the National Planning Framework and the relevant provisions of the Dublin City Development Plan 2016-2022. It should also have regard to the location of the development site close to Dublin City Centre and in an established residential area that is well served by public transport and has a wide variety of services and amenities. 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.

- 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. Photomontages, cross sections, visual impact analysis, shadow analysis and landscaping details to indicate potential visual impacts on Grace Park Road and on the setting of the protected structure High Park House and church and on the residential amenities of Grace Park Manor, Highfield healthcare facility and Beechlawn nursing home.
 2. Clarification of any proposed connection to third party lands, e.g. key pad access, along with wayfinding measures within the development to promote use of same.
 3. Rationale for proposed childcare provision (or lack of same) with regard to, inter alia, the 'Childcare Facilities Guidelines for Planning Authorities', circular letter PL 3/2016, and the 'Sustainable Urban Housing Design Standards for New

Apartments – Guidelines for Planning Authorities’ (2018), to provide details of existing childcare facilities in the area and demand for childcare provision within the proposed scheme. The applicant is advised to consult with the relevant Childcare Committee in relation to this matter prior to the submission of any application.

4. Development assessment of potential impacts on Dublin Port Tunnel, with regard to the requirements of Dublin City Development Plan 2016-2022 Appendix 6, the requirements of Transport Infrastructure Ireland as set out in its submission to An Bord Pleanála dated 2nd July 2018 and the TII document ‘Guidance Notes for Developers. The assessment of surface and sub-surface developments in the vicinity of Dublin Port Tunnel’. Particular consideration is to be given to potential impacts associated with basement construction in the vicinity of the Port Tunnel.
 5. Rationale for the proposed car parking provision with regard to Dublin City Development Plan 2016-2022 Table 16.1 car parking standards and the performance related approach set out in the ‘Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities’ (2018) in relation to infill sites in urban areas.
 6. Full auto track drawings of all proposed car parking areas.
 7. An Archaeological Impact Assessment shall be submitted which responds to the comments outlined in the report received by the Board from the National Monuments Service which is attached and which includes consideration of potential archaeological impacts of the construction of basement car parks.
 8. AA screening report.
- 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. The Minister for Culture, Heritage and the Gaeltacht
 2. The Heritage Council
 3. An Taisce
 4. An Chomhairle Ealaíon

5. Fáilte Ireland
6. Irish Water
7. Transport Infrastructure Ireland
8. National Transport Authority
9. Relevant 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.

Sarah Moran
Senior Planning Inspector

24th July 2018

