



An
Bord
Pleanála

**S. 6(7) of Planning and
Development (Housing)
and Residential
Tenancies Act 2016
Inspector's Report on
Recommended Opinion
ABP-303265-18**

Strategic Housing Development

Mixed use development in 9 blocks (3 to 15 storeys) 560 no. apartments, enterprise space, retail units, foodhub/café/exhibition space, residential amenity, creche, men's shed.

Location

1-4 East Wall Road, Dublin 3

Planning Authority

Dublin City Council

Prospective Applicant

Glenveagh Living Limited

Date of Consultation Meeting

6th February 2019

Date of Site Inspection

16th January 2019

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 on East Road, to the immediate north of a railway line. This is an area with a mix of land uses that has undergone significant changes in the last couple of decades. Land uses on East Road include small scale retail / commercial / light industrial, 2 storey housing dating to the 19th and 20th centuries, An Post sorting office, the Island Key commercial development (up to 8 storeys) and apartment blocks including Teeling Way (3 storeys) to the immediate north of the subject site. There is also a 2 storey infill development, Merchants Square, to the immediate east of the site. The North Docklands Area on the other side of the railway line is an SDZ undergoing a transition from low rise / industrial warehousing type uses to a new urban quarter with mixed use development and new streets and spaces. East Road is accessed via a narrow bridge over the railway line (single carriageway).
- 2.2. The site has a stated area of 2.145 ha and is currently in light industrial use as a trailer hire, maintenance and sales depot with access from East Road. The site boundary also includes 2 existing 2 storey redbrick houses that are currently in use as the East Wall Men's Shed.

3.0 Proposed Strategic Housing Development

- 3.1. The development comprises:
- Demolition of all existing structures on site.

- 9 blocks (3-15 storeys). The 15 storey element (Block D2T) located at the southern corner of the site, facing the junction of the railway line and East Road.
- 560 apartments with courtyard open spaces at podium level. The proposed housing mix is as follows:

Unit Type	No. of Units	%
Studio	60	11%
1 bed	220	39%
2 bed	235	42%
3 bed	45	8%
Total	560	

- Civic plaza and central open space at ground level, accessed from East Road with commercial / residential amenity / community uses at ground floor level.
- Relocated vehicular access from East Road. 241 undercroft car parking spaces. 810 cycle parking spaces. Alterations to existing road layout of East Road.
- Part V proposals comprising transfer of 56 no. apartments on site.
- The following additional land uses:

Land Use	Floor Area (sq.m.)
Creche (65 childcare spaces)	538.1
3 no. retail units	344.4
Food hub / café / exhibition space	680.8
Enterprise Space	2442.5
Men's Shed	91.8
Residential amenity space	361.6

3.2. Details of the proposed 9 blocks:

Block	Height floors	GFA (sq.m.)	Land use
A1 East Road frontage	3-7	4,044.	70 res units Ground floor retail facing East Road Ground floor enterprise units Podium courtyard
A2 Northern end of site, Teeling Way boundary	4-7	4,448.3	69 res units Ground floor enterprise units Podium courtyard
A3 Centre of site, Teeling Way boundary	4-7	3,970	56 res units Ground floor enterprise units Foodhub / café / exhibition space
B1 Eastern end of site, Merchants Square boundary	3-4	1,355	16 res units Men's Shed Podium courtyard
B2 Eastern end of site, Merchants Square boundary	5-6	2,712	34 res units Ground floor enterprise units
C1 Southern side of site	6-8	4,313.4	62 res units Ground floor enterprise units 1 st floor creche with play area
C2 Southern end of site	5-10	5,547	85 res units Tenant amenity space Podium courtyard
D1	8	5,072.6	78 res units
D2 incl DT2	8-15	5,553.1	90 res units Podium courtyard

3.3. An EIAR is to be submitted with the application.

4.0 Planning History

4.1. 4803/08 PL29N.232517

4.1.1. Permission sought for mixed use development comprising a hotel, office accommodation, retail floor space, gym and pool, healthcare centre and cafe/restaurant accommodation in 4 no. blocks (4 to 17 storeys) above a shared 3 storey basement car park (1,044 no. parking spaces) with access from East Road. Permission was also sought for the construction of a Linear Park running from north to south on the application site. Dublin City Council refused permission for 3 reasons relating to:

- Contravention of development plan building height policy by reason of prominence, height and overall poor architectural quality, insufficient urban design and strategic rationale, absence of contribution to the public domain, negative visual impact on the immediate streetscape and adjoining area.
- Contravention of Z14 zoning which aims to seek social, economic and physical development or rejuvenation of an area with mixed use including residential. No residential component is proposed as part of this application, the proposed development would not aid in the economic and physical rejuvenation of the area as it results in very unanimated uses during the night time and weekends.
- Having regard to the design, height, scale and proximity to site boundaries, it is considered that the proposed development would seriously injure the residential amenities of the area and/or development potential of property in the vicinity, by reason of overlooking, overshadowing, visual intrusion, traffic congestion, particularly properties to the north, east and west of the site, and would set an undesirable precedent for similar type development in the area.

An appeal to ABP was withdrawn.

4.2. 0107/02 PL29N.129420

4.2.1. Permission sought for 4 blocks (4-5 storeys) containing a creche, retail units, office space and 81 no. apartments with associated underground parking & storage, surface parking spaces, internal roads, drainage including temporary on-site sewage

treatment plant and landscape works. The Board refused permission for the following 3 reasons:

1. Having regard to the proposed entrance arrangements, through an arched gateway-type entrance, and the internal road layout which indicates access for a future link to the adjacent site to the south, it is considered that the proposed development would constitute a poor urban design approach to the redevelopment of this site, would result in an unsatisfactory residential environment for the residents of the proposed development and would prejudice an integrated approach to the development of this site and the adjacent lands. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
2. Having regard to the scale of the proposed development and its location on East Road, the provision of car-parking on site, and the inadequate existing and proposed provision for public transport and cycling, it is considered that the proposed development would be likely to generate car-parking demand in excess of the off-street spaces available and so would generate parking on the public road, create obstruction for road users and would, therefore, increase traffic congestion and endanger public safety by reason of traffic hazard.
3. It is considered that the proposed five storey Block 3, because of its height and proximity to the northern boundary of the site, would seriously injure the amenities of property to the north, by reason of overshadowing and visual obstruction. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

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

5.2. Dublin City Development Plan 2016-2022

5.2.1. The site has the standard residential zoning objective Z14 *'To seek the social, economic and physical development and/or rejuvenation of an area with mixed use of which residential and Z6 would be the predominant uses.'*

5.2.2. Chapter 5 Quality Housing. Policy QH8:

"To promote the sustainable development of vacant or under-utilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and the character of the area."

5.2.3. Development plan section 4.5.4 deals with taller buildings. It states:

"Clustering of taller buildings of the type needed to promote significant densities of commercial and residential space are likely to be achieved in a limited number of areas only. Taller buildings (over 50m) are acceptable at locations such as at major public transport hubs, and some SDRAs. For example, the North Lotts and Grand Canal Dock SDZ planning scheme provides for a limited number of tall buildings at Boland's Mills, the Point, Spencer Dock Square and Britain Quay.

There are also a few areas where there are good transport links and sites of sufficient size to create their own character, such that a limited number of mid-rise (up to 50m) buildings will help provide a new urban identity. These areas of the city are the subject of a local area plan, strategic development zone or within a designated SDRA."

There are no specific objectives relating to building height at the development site.

Policy SC16 applies:

To recognise that Dublin City is fundamentally a low-rise city and that the intrinsic quality associated with this feature is protected whilst also recognising the potential and need for taller buildings in a limited number of locations subject to the provisions of a relevant LAP, SDZ or within the designated strategic development regeneration area (SDRA).

5.2.4. The site is located in SDRA 6 Docklands (SDZ and Wider Docklands Area), within the Docklands Area of the SDRA. Development plan section 15.1.1.7 applies. The following points of same are noted in relation to residential development:

- Holistic approach to housing that will achieve successful integration of residents, neighbours and the wider community.
- Promote the expansion of the Docklands' residential population, cater for life-cycle requirements of the existing population and provide recreational facilities for children across a range of ages.
- Provide for residential choice with schemes conducive to family living, longterm rental and home-ownership
- Achieve successful interaction between the SDZ scheme and surrounding streets and public realm to retain and foster a strong sense of neighbourhood within communities
- Ensure that residential developments optimise the unique Docklands character in terms of visual context, maritime location, heritage assets and community identity
- Provide physical, social and amenity infrastructure in tandem with new housing
- Safeguard residential amenity and ensure appropriate transition in scale. Design of new development to have regard to the context, setting and amenity of existing housing within the SDZ and wider Docklands area
- Provision of Part V and use of the voluntary and co-operative model to achieve mixed tenure communities, also provision of support housing in conjunction with housing agencies.
- Encourage 'own front doors' and defensible open space as far as practicable

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; Application Fee; Irish Water correspondence; letter of consent from Dublin City Council; Planning Report; Statement of Consistency; Preliminary EIAR Summary Report; Plans, sections and elevations; Design Statement; Part V proposals and Estimate of Costs; Landscape Drawings and Design Rationale Report; Draft Appropriate Assessment Screening Report; Infrastructure Design Report; Traffic and Transport Assessment; Parking Strategy Report; Statement of Compliance with DMURS; Site Specific Flood Risk Assessment; Preliminary Construction Management Plan; Wind Microclimate Study; Sunlight and Daylight Access Analysis; Photomontages; Enterprise Management Plan; Sustainability Report; Site Lighting Report.

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 23rd January 2019. The planning authority's 'opinion' included the following matters:

6.3.2. PA Comment on Principle of Development

- The proposed land uses are all permissible in principle within the Z14 zoning objective.
- Z14 indicative plot ratio of 1.0 and 3.0, indicative site coverage 50%.
- The site could accommodate more non-residential / employment uses, particularly at the lower levels. The lack of a basement level ensures that a significant area at ground floor level is occupied by car parking behind the retail and employment frontages.
- The development plan requires a minimum of 5% of space in the Docklands SDRA area to be used for social, cultural, creative and artistic purposes and the location should be clearly indicated.
- The proposed childcare provision is considered adequate with regard to the proportion of 1 bed / studio units in the housing mix.

6.3.3. PA Comment on Residential Quality, Design and Layout of Development

- 62.5% of the apartments would be single aspect (37.5% dual aspect). There are concerns about single aspect units facing northwest and northeast. The site is a sizeable standalone brownfield site of sufficient size to allow for freedom to provide more than the minimum required 33% dual aspect units.
- Includes a report by Dublin City Council Parks and Landscape Services.
- The nearest public park is the East Wall Recreation Centre, 150m to the west of the site. The East Wall area is considered to be deficient in public space relative to the city as a whole. The Parks and Landscape Services Division states concerns in relation to the need to provide for an area of public open space that can be identified as a park, accessible to the local community and to residents of the scheme. The park should be well designed and provide for active and passive recreational facilities.
- The planning authority has no objection to the location of the proposed public open space subject to meeting the minimum 10% public open space requirement and the provision of public open spaces to a high quality with an acceptable level of sunlight, useable and genuinely accessible to the East Wall Area.

- The communal open spaces should be clearly delineated and separate from the 10% public open space, except for one courtyard that appears to be publicly accessible. It should be demonstrated that these spaces can meet the requirement for 3,395 sq.m. of communal open space as set out in the departmental guidelines.
- Lack of basement parking means that large areas of the ground floor area are occupied by undercroft parking behind the employment and retail frontages.
- Recommendations regarding the design of the communal open space areas to provide privacy and be guided by shadow analysis.
- The applicant should consider the relocation of the resident / tenant amenity spaces from the south west frontage of the new public square to allow for a use in this area which better complements the public nature and function of this space.
- All flat or gently sloping roofs should be green roofs, c. 70% roof area.
- Recommends conditions regarding the design and operation of public open spaces, those to be taken in charge and not taken in charge.

6.3.4. PA Comment on Impacts on Visual and Residential Amenities

- Concerns about visual impacts of higher elements of the scheme on low rise housing in the East Wall area. Wider visibility acceptable in the context of SDZ development to the south of the railway line. Need for a very high quality design with a more lightweight appearance. Further photomontages / axiometric views would be useful.
- Development is designed to minimise overlooking to adjoining residential properties.
- Blocks B1 and B2 are stepped down at the boundary with Merchants Square. Adequate separation distances are achieved.
- Any development at the site to a sustainable density is likely to result in some additional overlooking / overshadowing. Relevant national policy is noted.

6.3.5. PA Comment on Traffic and Transportation

- Includes comment from the Transportation Planning Dept.

- The site is well served by public transport in close proximity including Docklands railway station, the Luas line (Spencer Dock stop) and a number of bus routes along East Road and East Wall road that are likely to be increased in frequency as part of the Bus Connects plan. The Greater Dublin Cycle Network Plan will also impact on the site providing an alternative route between Clontarf Road and Docklands and linking to the quays. Connolly Station and the proposed Clongriffin / Tallaght BRT interchange are 1.4 km from the site.
- Several road improvements are required to facilitate the development including upgrading of the East Road / Church Road junction to a priority controlled junction, upgraded junction arrangements to provide dedicated pedestrian crossing facilities and provision of cycle lanes along East Road. These provisions are to be carried out at the expense of the applicant. They may need to be included in the red line site boundary.
- The proposed 3 no. parking spaces on East Road close to the junction with Church Road should be omitted for road safety reasons. The site is in car parking area 2 which requires a maximum provision of 1 space / residential unit and the development allows for 0.4 car parking spaces / residential unit. This is in keeping with Council policy to minimise car use in accessible areas of the city and the submitted parking rationale is accepted. The proposed cycle parking provision is acceptable.
- Details of refuse servicing and collection are required.
- Areas to be taken in charge need to be identified.
- The development is acceptable subject to further particulars to be submitted with the application in relation to the above matters, also confirmation from a car club provider detailing commitment to a car share scheme, detailed car and cycle parking management plans.

6.3.6. PA Comment on Site Services

- Includes comment from DCC Drainage Division, which states no objection subject to conditions.

- Further flood risk assessment to be carried out assuming a one year high tide event during 100-year rainfall event and showing the impact of 20% climate change.

6.4. Irish Water Comment

6.4.1. Irish Water has issued a Confirmation of Feasibility and comments on the proposed development. The following points of same are noted:

- The applicant must carry out upgrades to the IW network to facilitate the development (previous correspondence refers to new connections to trunk watermains on East Wall Road, possibly using an existing connection to a trunk watermain at the junction of East Wall Road and the Port tunnel). These will not require planning permission or other third party or statutory consents other than a road opening licence from the planning authority.
- The IW network requires reconfiguration works in the vicinity of the East Road Pumping Station to accommodate the development. IW is currently doing a survey of the network, which is not yet complete. This survey will determine the correct location to connect to the IW network. The likely result is that a network extension will be required. This will not require planning permission or other third party or statutory consents other than a road opening licence from the planning authority.

6.5. Consultation Meeting

6.5.1. A section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 6th February 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.

6.5.2. 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. Principle of development, Z14 zoning objective, objectives for SDRA 6, building height.
2. Design of development, visual impacts and interaction with the public realm. Impacts on residential amenities.

3. Quality of residential accommodation.
4. Traffic, transportation, parking provision, works to East Road to facilitate the development.
5. Site Services
6. Any other matters

6.5.3. In relation to the principle of development, Z14 zoning objective, objectives for SDRA 6, building height, ABP representatives sought further elaboration / discussion on:

- The overall development strategy for the site
- Details of proposed residential, commercial, community and other land uses.
- Management company for the commercial development
- Proposed heights in the context of national and local planning policy.

6.5.4. In relation to the design of development, visual impacts and interaction with the public realm. Impacts on residential amenities, ABP representatives sought further elaboration / discussion on:

- Proposed landscaping scheme and provision of hard and soft landscaping.
- Which areas of the scheme are to be public / accessible to residents only.
- The visual impact of the development on adjacent residential areas and on the wider area.
- Rationale for use of undercroft parking rather than basement provision.
- Amenities for tenants

6.5.5. In relation to the quality of residential accommodation, ABP representatives sought further elaboration / discussion on:

- Proposed landscaping scheme and provision of hard and soft landscaping.
- Which areas of the scheme are to be public / accessible to residents only.
- The visual impact of the development on adjacent residential areas and on the wider area.
- Rationale for use of undercroft parking rather than basement provision.

- Amenities for tenants
- Use of brick finishes

6.5.6. In relation to traffic, transportation, parking provision, works to East Road to facilitate the development, ABP representatives sought further elaboration / discussion on:

- Undercroft parking and basement provisions
- Is there dedicated parking provision for the creche.
- Car parking management.
- MUD Act in the context of this development

6.5.7. In relation to site services, ABP representatives sought further elaboration / discussion on:

- Flood risk
- Irish Water

6.5.8. In relation to any other business, ABP representatives sought further elaboration / discussion on:

- AA
- Submission of EIAR
- Distribution of Part V units

6.5.9. 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 ABP-303265-18' 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 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 **constitutes a reasonable basis for an application under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.**
- 7.4. 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, and submissions received from statutory consultees referred to under Section 6(10) of the Act, An Bord Pleanála is of the opinion that **the documentation submitted would constitute a**

reasonable basis for an application for strategic housing development to An Bord Pleanála.

8.3. 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 arising from this notification:

1. Rationale for proposed building height with regard to the criteria provided in section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities.
2. Proposals to address the development plan requirement that a minimum of 5% of space in the Docklands SDRA area is to be used for social, cultural, creative and artistic purposes with the location of same clearly indicated on the submitted plans.
3. Photomontages, cross sections, visual impact analysis, shadow analysis, boundary treatment and landscaping details to indicate potential impacts on visual and residential amenities, to include views from the wider area including in particular adjacent residential areas; axiometric views of the scheme and CGIs.
4. Daylight/Sunlight analysis, showing an acceptable level of residential amenity for future occupiers of the proposed development, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development. The analysis should also consider potential overshadowing impacts on adjoining residential areas.
5. Analysis of wind microclimate at ground level.
6. A detailed landscaping plan for the site which clearly sets out proposals for hard and soft landscaping including street furniture where proposed and indicates which areas are to be accessible to the public.

7. Revised roads and vehicular access layout at East Road, to address issues raised in the report of Dublin City Council Transportation Planning Division dated 15th January 2019.
 8. Rationale for proposed car parking provision, to include details of car parking management and car share scheme.
 9. A site layout plan, which clearly indicates what areas are to be taken in charge by the Local Authority.
 10. Surface water drainage proposals to address issues raised in the report of the Engineering Department – Drainage Division of Dublin City Council dated 21st January 2018.
 11. Site Specific Flood Risk Assessment, based on a one year high tide event during 100-year rainfall event and showing the impact of 20% climate change as per the 'Dublin City Development Plan 2016-2022 Strategic Flood Risk Assessment', to consider downstream / displacement impacts as a result of the proposed development.
 12. A noise report, which addresses the potential noise impact from the adjoining railway line and clearly outlines proposed noise mitigation measures, if so required.
- 8.4. 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. Irish Water
 2. Transport Infrastructure Ireland
 3. National Transport Authority
 4. Dublin City Childcare Committee
 5. Córas Iompair Éireann
 6. Commission for Railway Regulation

7. Iarnród Éireann

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

22nd February 2019