



An
Bord
Pleanála

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

Inspector's Report on Recommended Opinion ABP-305535-19

Strategic Housing Development

Demolition of existing industrial buildings on site and construction of 211 no. apartments and associated site works.

Location

Glen Abbey Complex, Belgard Road, Cookstown Industrial Estate, Dublin 24.

Planning Authority

South Dublin County Council

Prospective Applicant

Sq. Ft. Property Services Limited

Date of Consultation Meeting

13th November 2019

Date of Site Inspection

3rd November 2019

Inspector

Una O'Neill

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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 appeal site is located to the west of Belgard Road, Tallaght, Dublin 24. The site is at the eastern edge of the Cookstown industrial estate. Belgard Luas stop is approx. 550m northwest of the site, Tallaght hospital is to the southwest of the industrial estate; Tallaght town centre is approx. 1km south; Tallaght village is approx. 1.5km to the southeast.
- 2.2. With a stated area of 0.73ha, the site comprises industrial/warehouse buildings. Adjoining land uses to the north and west are industrial / commercial in nature. Vehicular access is off the Belgard Road and is a shared access serving Comans Beverages Ltd. (drinks distributor) to the immediate west of the site, a vacant office building to the immediate east and a gym to the north. The access road is in the ownership of Comans Beverages Ltd, with the applicant having a right of way over this access. The area to the front of the building is an open parking area serving the warehouse units and the neighbouring gym. This parking area is also in the ownership of Comans Beverages Ltd. There is an existing laneway to the west of the appeal site which is bounded by an existing warehouse unit on the adjoining site operated by Comans Beverages Ltd. Colbert's Fort to the south comprises a small enclave of single-storey houses, accessed from Belgard Road.

3.0 Proposed Strategic Housing Development

- 3.1. The proposed development comprises demolition of the existing industrial buildings on site and the provision of two blocks of apartments comprising 211 no. Build-to-Rent units. The apartment blocks range in height from 4 to 10 storeys over basement.
- 3.2. The following details are noted:

Parameter	Site Proposal
Application Site	0.73 ha
No. of Units	211 Build to Rent apartments, with additional residents' facilities and amenities in the form of an entrance area (approx. 69.6m ²), a Residence's Lounge (approx. 150m ²), an area of 46.3m ² equipped with work stations, a concierge office (approx. 7.9m ²) and laundry room (approx. 12.7m ²).
Density	289 u/ha
Height	Block A – 10 floors Block B – 5 floors to southern section and 8 floors to eastern section
Parking	0.37 spaces per apartment 80 spaces in total – 73 at basement, 6 disabled spaces and 1 Go Car Space. 480 bicycle spaces.
Vehicular Access	From Belgard Road with pedestrian access from Colbert Fort. Emergency vehicular access also possible from Colbert Fort.

- 3.3. The breakdown of unit types is as follows:

Unit Type	Studio	1 bed	2 bed	3 bed	Total
Apartments	17	82	102	10	211
% Total	8%	39%	48%	5%	100%

23 units are identified for social housing.

4.0 Planning History

4.1. No recent planning history on the site.

5.0 Planning Policy

5.1. National Policy

5.1.1. Project Ireland 2040 - National Planning Framework

- National Policy Objective 3c: Deliver at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs, within their existing built-up footprints.
- National Policy Objective 4: Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- National Planning Objective 13: In urban areas, planning and related standards, including, in particular, height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.
- National Policy Objective 33: Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

5.1.2. 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 following policy documents and Section 28 Ministerial Guidelines are relevant:

- Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities (2009) and the accompanying Urban Design Manual: A Best Practice Guide (2009)
- Sustainable Urban Housing: Design Standards for New Apartments (2018)
- Urban Development and Building Heights, Guidelines for Planning Authorities (2018)
- Design Manual for Urban Roads and Streets (2013)
- The Planning System and Flood Risk Management (including the associated 'Technical Appendices') (2009)
- Childcare Facilities – Guidelines for Planning Authorities 2001 and Circular PL3/2016 – Childcare facilities operating under the Early Childhood Care and Education (ECCE) Scheme.

5.2. Local Planning Policy

5.2.1. South Dublin Development Plan 2016-2022

- **Zoning Objective REGEN:** 'to facilitate enterprise and/or residential-led regeneration'.
- SDCC Vision: New Regeneration zoning objective 'REGEN' has been introduced to support and facilitate the regeneration of underutilised industrial lands that are proximate to town centres and/or public transport nodes for more intensive enterprise and residential led development.
- Section 1.7.2 Metropolitan Consolidation Towns – Tallaght is a Metropolitan Consolidation Town.
- **Core Strategy (CS) Policy 2 Metropolitan Consolidation Towns**

It is the policy of the Council to support the sustainable long term growth of Metropolitan Consolidation Towns through consolidation and urban expansion.

- **CS2 Objective 4** – To promote and support the regeneration of underutilised industrial areas within areas designated with zoning objective Regeneration (REGEN);
- **CS2 Objective 6** – promote higher residential densities at appropriate locations, adjacent to town centres or high capacity public transport nodes (Luas/Rail);
- Section 1.9.0 Local Area Plans, Approved Plans and Studies: Local Area Plans will be prepared for areas where new development requires a co-ordinated approach and in particular for areas that are likely to experience large scale development or are in need of regeneration:
- **Core Strategy (CS) Policy 6 Local Area Plans**: It is the policy of the Council to prepare Local Area Plans as appropriate, and to prioritise areas that are likely to experience large scale residential or commercial development or regeneration.
 - **CS6 Objective 1**:

To prepare Local Area Plans for areas that are likely to experience large scale residential or commercial development or regeneration.
 - **CS6 Objective 2**:

To support a plan led approach in Local Area Plan areas by ensuring that development complies with the specific local requirements of the Local Area Plan, in addition to the policies and objectives contained in this Development Plan.
- Section 11.2.4 Regeneration Zone:

A Design Statement (see Section 11.2.1 Design Statements) accompanying development proposals in Regeneration (REGEN) zones should also address the following criteria:

 - Demonstrate a clear transition towards a more urban form of development and a traditional street network.

- Address connectivity and linkages in the area and demonstrate that the development of the site would not give rise to isolated piecemeal pockets of residential development that are disconnected from shops, amenities and/or other residences.
- Residential development should not be introduced at ground floor level adjacent to busy roads, and/or roads that are subject to significant movements by Heavy Goods Vehicles (HGVs).
- Given the transitional nature of Regeneration zones, precautions will be taken to ensure that the potential for noise pollution, air pollution or other nuisance from established industrial uses will not exceed acceptable environmental standards. The Planning Authority may seek a report from a suitably qualified person to identify and quantify sources of noise pollution, air pollution, or nuisance, assess the potential impacts on the proposed development and provide a series of recommendations to mitigate the impacts of any pollutants insofar as possible (e.g. orientation and layout of dwellings, positioning of openings and insulation).
- It may be necessary to consider improvements to the surrounding road and street network in conjunction with the Planning Authority, to calm traffic and improve pedestrian and cyclist access.
- **H8 Objective 4** – support proposals for more intensive enterprise and/or residential led development within areas designated for Regen subject to design safeguards;
- **Economic and Tourism (ET) Policy 2 Enterprise and/or Residential Led Development in Regeneration Zones:**
 - **ET2 Objective 2:**

To support proposals for more intensive compatible enterprise and/or residential led development on lands designated with Zoning Objective 'REGEN', subject to appropriate design safeguards and based on a traditional urban form that adhere to urban design criteria.
- **Section 5.1.5 of Dev Plan – Building heights in urban centres:**

- **UC6 Objective 3:**

To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centre, Regeneration and Strategic Development Zones, and subject to an approved Local Area Plan or Planning Scheme.

- **Tallaght Town Centre Local Area Plan**, adopted in 2006, extended in 2011 and is now expired.

- **Draft Tallaght Town Centre 2020-2026** has been published.

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 submission and the discussions which took place during the tripartite consultation meeting. I shall provide a brief detail on each of these elements hereunder.

6.2. Prospective Applicant's Case

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.

6.2.2. This information included, inter alia, a Completed SHD Application Form, Planning Report and Statement of Consistency, AA Screening Report, Architectural Design Statement, Architectural Drawings, Bat Survey, Building Lifecycle Report, Daylight and SunCast Report, DMURS Statement, Energy and Sustainability Report, Engineering Drawings, EIAR Screening Report, Flood Risk Assessment, Infrastructure Report, Landscape Proposals and Design Rationale, Lighting Report, Surface Water and Foul Calculations Report, Transport Statement, and Utility Report.

6.2.3. I have reviewed and considered all of the documents and drawings submitted.

6.3. Planning Authority Submission

6.3.1. In compliance with section 6(4)(b) of the Act of 2016 the planning authority for the area in which the proposed development is located, South Dublin County Council, submitted a note 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 29th October 2019.

6.3.2. South Dublin County Council's opinion included a description of the site and proposed development, planning policy context, planning history, and an assessment of the proposed development. The content of the report is summarised as follows:

- Policy of the Development Plan
 - Proposal is in compliance with development plan zoning, however PA has concerns regarding site constraints.
 - Proposal does not comply with section 11.2.4 of the development plan due to physical constraints, proposed access arrangements, and inadequate environmental assessment of the development.
- Draft Tallaght Town Centre LAP 2020-2026
 - Draft LAP published on 12th September 2019.
 - Proposed development would provide for 3.5% of the residential capacity for Cookstown area under the Draft LAP on 1.5% of the lands. The proposal is too dense for this location.
 - Proposed development would be inconsistent with the Draft Local Area Plan policy on sequential development and would be inconsistent with the proper planning and sustainable development of the area.
 - Objective of the draft LAP that development is should extend outwards from the town centre, with land closest to the centre and public transport nodes being given priority. The application site is not considered to be a town centre, or perimeter site, or a site located beside a high quality public transport; it is not sequential development.

- Draft LAP indicates that can only proceed with non-sequential development, ie development outside of these areas, in exceptional circumstances; eg where there is a barrier to dev, or if have a proposal for a site greater than 2 ha in area, where PA may consider the proposal can establish its own identity and amenity in the transition phase of development. The site is not of an appropriate size (0.74ha) for non-sequential residential development within this regeneration area, which is part of an industrial areas and is constrained by its size, access arrangements and adjoining uses. The applicant has been advised to explore the potential for acquiring neighbouring sites.
- Unit mix is set out in section 5.2.1 of the draft plan, where a min 30% of units within any new residential development shall have a minimum of 3 bedrooms.
- Tenure mix is set out in section 5.2.2 of the draft plan, where a min 30% of dwellings units for owner occupation/private sale; max 60% of dwelling units for Build to Rent; min of 10% of dwelling units for social housing (Part V). It is the PA view therefore that no more than 60% of the units should be for build to rent.
- Density, plot ratio and height are addressed within section 3.3 of the draft plan. Plot ratio of 0.75-1.0 is specified. Buildings at this location should be 3-4 storeys in height. A gradual change in height is required at the transition with Colbert's Fort. The proposed development exceeds the plot ratio and is too dense and the height limits have been exceeded.
- Site Context and Adjoining Uses
 - The site is at present unsuitable for residential development. The juxtaposition of residential development and associated amenity areas with the adjoining light industry/drinks distribution site would provide a poor standard of development with inadequate levels of residential amenity for future occupiers.
 - Site is small and has a narrow rectangular shape. The impact of this juxtaposition of sites cannot be overcome through an alternative design approach.

- Urban Design
 - South Dublin Development Plan policy is referenced, specifically policy H11 residential design and layout; H6 sustainable communities; H7 urban design.
 - Section 9 of the draft LAP sets out design criteria. Section 2.6 indicates block size and form and appropriate external finishes and appearance of the development.
 - Proposal does not provided for a full block of development, only $\frac{3}{4}$ of a traditional urban block. The adjoining industrial building would have a major detrimental visual impact on the communal amenity space and residential development as a whole, providing for a poor level of residential amenity.
 - PA would support a separate access to the site and not a shared access with the industrial estate. The development is not set back from this shared access road.
 - PA would support own door access at ground level to give an animated street.
 - There are conflicting adjoining uses which would cause noise or other nuisance to future residents.
 - Eastern perimeter provides for a poor streetscape, pending development of the site to the east which is out of the control of the developer.
 - Western streetscape, which would be temporary pending delivery of adjoining site, would be extremely poor set between the existing industrial building and defensive boundary of this development and its communal open space.
 - North facing single aspect units proposed. No detail on numbers of dual aspect units proposed.
 - Overbearing visual impact on existing residential development of Colbert's Fort to the south.
 - A fine urban grain and lower height required along the southern boundary.

- Public realm department consider the public open space is of poor quality and the public plaza to Colbert's Fort is dominated by a circulation path and hard landscaping and is not up to standard, revised proposals for overall layout required.
- TTA not accurate in terms of assumptions, however, based on PA assumptions, impact on road network would not be significant; parking provision at 0.37 is low.
- A Mobility Management Plan is required.
- A Construction and Environmental Waste Management Plan is required.
- Concern over the use of a shared access road with an existing industrial facility. If road is not to be shared with the industrial facility to the west, certainty is required in relation to this and this road would require to be redesigned as an urban street.
- Surface water layout and figures used questionable/lacking; attenuation system is significantly undersized; not clear why pumping surface water is required and gravity should be used.
- Applicant to have regard to the HeatNet project and the proposed scheme should be district heating enable.
- The Ecology and Bat survey found no bats or bat roosts. However no mitigation during the demolition or construction stage.
- Conclusion:
 - The proposed development would be premature and inappropriate given the severe site constraints which presently apply. Development on this and adjoining sites should be proposed as part of a single application in order for the PA to be in a position to recommend a grant of permission to develop out of sequence with the recommended sequence of development under the draft LAP, notwithstanding the issues to be assessed by the PA in any event.

7.0 The Consultation Meeting

- 7.1. A Section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 13th November 2019, commencing at 14.00 pm. Representatives of the prospective applicant, the Planning Authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.
- 7.2. The main topics raised for discussion at the tripartite meeting were based on the Agenda that issued in advance and contained the following issues:

1. Prematurity of SHD with regard to South Dublin Development Plan 2016-2022 and status of draft Tallaght Town Centre Local Area Plan 2020-2026.
2. Development strategy, specifically in relation to context/location of site, juxtaposition with neighbouring land/land uses, and REGEN development criteria.
3. Density, height and amenity for future occupants.
4. Design Issues, including inter alia the number of north facing single aspect units.
5. Site services.
6. Any other matters.

Prematurity of SHD in context of status of draft Tallaght Town Centre Local Area Plan 2020-2026

- 7.2.1. ABP representatives sought further elaboration on the policy context:
- Further consideration of documentation in relation to whether the proposed development is premature pending the adoption of the Tallaght Town Centre Local Area Plan.

7.3. Development Strategy

- 7.3.1. ABP representatives sought further elaboration on development strategy:
- Immediate context of site, set back from Belgard Road and between sites in separate ownership.
 - Amenity and outlook for future residents.

- Traffic impact and HGV access.
- Mitigation in terms of noise, air pollution, nuisance etc.
- Site interface to west and east.
- Public realm to the north and pedestrian movement.
- Dwellings to the south and impact on these.
- Timeline for development of the wider area, specifically the adjoining sites.

7.4. Density, Height and Amenity

7.4.1. ABP representatives sought further elaboration on following:

- Height strategy for the area.
- Location of site set back from the road and it's immediate context between sites.
- Amenities for future occupants in terms of outlook and access to wider amenities given industrial estate context.

7.5. Design Issues

7.5.1. ABP representatives sought further elaboration on the following design issues:

- Provision of a number of north facing single aspect apartment units.
- Pedestrian movement into/out of the site at the entrance from Belgard Road.
- Crèche provision and compliance with guidelines.

7.6. Site Services

7.6.1. ABP representatives sought further elaboration on the following:

- Surface water drainage strategy and attenuation proposals.
- Traffic impact assessment and parking rationale.

7.7. Any Other Business

7.7.1. ABP representatives sought further elaboration on the following:

- Notification of Department of Defence and Air Corp.
- SPPR 7 and 8 of the apartment guidelines.

- Address PA comments in relation to Heatnet system.

8.0 Assessment

- 8.1. 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.
- 8.2. I have examined all of the information and submissions before me including the documentation submitted by the prospective applicant, the submissions of the Planning Authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the s.28 Ministerial Guidelines, and local policy, via the statutory plan for the area.
- 8.3. 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 as set out in the recommended Opinion below.

Conclusion

- 8.4. 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.
- 8.5. 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.

9.0 Recommended Opinion

- 9.1. 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.
- 9.2. 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.**
- 9.3. In the opinion of An Bord Pleanála, the following issues need to be addressed in the documents submitted to which section 5(5) of the Act of 2016 relates that could result in them constituting a reasonable basis for an application for strategic housing development:
1. An Bord Pleanála notes that a LAP for the area is currently at draft stage. The prospective applicant should satisfy themselves that the proposed development is not premature pending the adoption of a LAP for the area. Should an application be submitted prior to the adoption of a statutory LAP, the documentation at application stage should seek to demonstrate that the proposal would not give rise to piecemeal, haphazard and non-integrated development given its current context and that any proposed development at this juncture would not compromise potential redevelopment of adjacent lands. The documentation should also seek to demonstrate how the proposed development provides a scheme of appropriate residential amenity given the proximity to, and interface with, existing light industrial/commercial development on adjoining lands.
 2. In the event an application is made, the documentation shall address the following matters:

- a. Further consideration/justification of height in relation to South Dublin Development Plan 2016-2022, specifically objective UC6 Objective 3.
- b. Number of north facing units and consideration of Section 28 Ministerial Guidelines Sustainable Urban Housing: Design Standards for New Apartments (2018).
- c. Consideration of the requirement for a crèche in light of Section 28 Ministerial Guidelines on childcare facilities.
- d. Demonstrate that the external finishes, materials and detailing of the proposed buildings, together with the landscaping and surface/boundary treatments of the outdoor spaces would be of a sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term.

The 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 arising from this notification:

1. Examination of a greater number of apartments in terms of daylight/sunlight analysis to ensure adequate amenity for future residents.
2. Visual impact assessment in relation to impact of height of development, with specific reference to dwellings on Colbert's Fort.
3. Site layout plan to be considered in the context of DMURS and pedestrian movement from the proposed apartment blocks to the entrance of the site.

4. Certainty to be demonstrated over future of shared access road with neighbouring industrial development to the west and redesign of this road as a street.
5. Noise impact assessment to be undertaken given context of site adjoining an industrial warehouse unit.
6. Response to issues raised in the reports issued by the Roads Department and Environmental Services Department, as addressed in the PA Opinion dated 29th October 2019 and attached in appendices D and E.
7. A life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban housing: Design Standards for New Apartments (2018). The report should have regard to the long term management and maintenance of the proposed development. The applicant should consider the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, podium design, pathways, and all boundary treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.
8. Mobility Management Plan.
9. Construction and Demolition Waste Management Plan.
10. A detailed schedule of accommodation which shall indicate compliance with relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2018.
11. A proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains in use as Build-to-Rent accommodation. There shall be a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residents units are sold or rented separately for that period (your attention is drawn to the provisions of Specific Planning Policy Requirement 7 of the 'Sustainable

Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2018).

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. Department of Defence
3. The Irish Aviation Authority
4. Transport Infrastructure Ireland
5. National Transport Authority
6. Coras Iompair Eireann
7. South Dublin 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 O'Neill
Senior Planning Inspector

2nd December 2019