



An
Bord
Pleanála

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

**Inspector's Report on
Recommended Opinion
ABP-305867-19**

Strategic Housing Development

Location	No. 86 and No. 90-96 Jamestown Road. Inchicore, Dublin 8.
Planning Authority	Dublin City Council.
Prospective Applicant	Fastnet Properties LLC (Fastnet).
Date of Consultation Meeting	7 th January 2020.
Date of Site Inspection	8 th December 2019.
Inspector	Dáire McDevitt.

1.0 Introduction

Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the planning authority and the documentation received from the prospective applicant, 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 subject site is located approximately c. 7km north-west of Dublin's city centre, c.1.3km south of the Phoenix Park and c.1.1km south west of Inchicore village. It has a stated area of 0.627 hectares. The site is located in a predominantly light industrial area between CIE lands to the north and the Grand Canal to the south. To the northeast is Tyrconnell Road which is predominantly residential. Blackhorse Luas stop is c.525m to the southeast at Blackhorse Bridge.
- 2.2 The site is located on a transitional area between industrial and residential land uses. To the west of are bollards to stop through traffic and separate Jamestown Road and Kylemore Way. The area on the Jamestown side is accessed from Tyrconnell Road/Blackhorse Bridge and is predominantly residential and low rise. The area on the Kylemore Way side is accessed via Kylemore Road and is predominately commercial and employment generating lands. A row of two storey houses are located on the northern side of the Jamestown Road opposite the eastern portion of the site.
- 2.3 The site is in effect two separate plots that have an access road (right of way) separating them, both plots are bounded by fencing and security gates. The eastern plot (No. 86 Jamestown Road) has a vacant building on site, the former Jamestown Studio. The western plot (No. 90-96 Jamestown Road) consists of a number of smaller units with a weekend indoor market operating from the site. The access road

to the lands to the rear (light industrial/warehousing) runs between the two plots. A footpath runs along the side of the eastern block.

3.0 Proposed Strategic Housing Development

The proposed development is outlined as follows:

The demolition of all structures (c. 4,450sq.m of gfa) and clearance of all hardstanding on site.

On a site with a stated area of 0.627 ha (this excludes the right of way/road through the site):

- Eastern plot (No. 86) with an area of c. 0.1763ha.
- Western plot: (No. 90-96) with an area of c. 0.4086ha.

127 units proposed:

- Eastern Block (64 units & Crèche)
- Western Block (63 units).

Heights:

- Eastern Block ranging from 1 to 11 storey (32.6m).
- Western Block ranging from 3 to 5 storeys (17.78m).

Crèche: c. 214sq.m to cater for 20 places.

Open Space:

- Private: balconies and terraces.
- Semi-private: c.811sq.m & c.1574sq.m.
- Public: a contribution proposed in lieu of public open space.

Parking: 86 car parking spaces provided under the western block. 319 bicycle spaces (basement and surface).

Part V: 13 units

Unit mix:

Block	1 Bed (studio)	1 Bed (apartment)	2 Bed (apartment)	3 bed (apartment)	3 Bed (duplex)	Total
Eastern	0	30	19	0	14	63
Western	6	16	30	12	0	64
% of total	5%	36%	39%	12%	14%	100%

4.0 Planning History

The most recent history pertaining to this site is as follows:

PA Ref. No. 4146/18 refers to an application for the change of use, partial demolition and construction. The proposed development included the change is use of the existing property at No. 86 from industrial and warehousing to residential, partial demolition of the existing structure and construction works resulting in new northern and southern building components (3 no. storeys) and an additional floor on the remaining existing structure increase (increase from 2 to 3 storeys) to provide 23 no. apartment units (1no. studio, 11 no. 1 bed, 7 no. 2 bed and 4 no. 3 bed). Permission is also sought for: 1 no. communal balcony/terrace, 19 no. private balconies/terraces and 13 no. private conservatories with visibility on all elevations. 13 no. car parking spaces and 46 no. residential and visitor bicycle spaces to the east of the building; upgrades and alterations to boundary treatments and access, including new multi-

modal and pedestrian entrances onto Jamestown Road, rooftop solar photovoltaic array; landscaping and ground-level communal open spaces; site/public lighting; signage along the eastern façade; rainwater harvesting infrastructure and all ancillary site development and servicing works. Permission was refused for the following 2 reasons:

- 1. The development of an entirely residential development at this location would contravene the zoning objective Z10 'To consolidate and facilitate the development of inner city and inner suburban sites for mixed uses with residential the predominant use in suburban locations and office/retail/residential the predominant use if inner city areas' as set out under Section 14.8.10 of Dublin City Development Plan 2016-2022. Therefore the proposed development would be seriously injurious to the amenities of the area and contrary to the proper planning and sustainable development of the area.*
- 2. The proposed redevelopment and extension of the existing structure would result in substandard residential development with regard to the minimum required floor to ceiling height and the percentage of dual aspect apartments as required under Specific Planning Policy Requirements 4 and 5 (respectively) of the 'Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities (2018)'. Therefore the proposed development would be seriously injurious to the residential amenity of potential residents and contrary to the proper planning and sustainable development of the area.*

A first party appeal was lodged under **ABP 303376-19** This was subsequently withdrawn.

PA Ref. No. 4319/16 refers to a grant of permission for the use of Units 1 and 2 Jamestown Park as an indoor market, operating at weekends only, with public hours on Saturdays and Sundays of 10am to 5pm both days, with trader activity an hour earlier and later each day; provision of onsite parking and 2 no. associated non-illuminated signage boards on the north and east elevations (3m² & 5m² respectively) for a period of 5 years.

PA Ref. No. 3662/11 refers to a grant of temporary permission for an indoor market.

PA Ref. No. 3206/14 refers to a grant of permission for the conversion and subdivision of a former industrial unit to 7 no. live work units and alterations to existing commercial units. The proposed works to be carried out include: provision of a further storey and roof terraces along the eastern and western facades above part of the main building; a second storey over a single storey element of the existing north end of the building including a new access stairs; partial demolition of structures along the eastern façade; alterations to the facades; signage along the eastern facade; provision of 15 no. designated car parking spaces; rain water harvesting with water tanks and heat pumps on the southern roof and associated site works.

Sample of SHD Pre Application Consultations/Applications in the area:

300184 Cairn Homes Ltd granted permission for student accommodation (399 bed spaces) at The Donnelly Centre, Cork Street, D8.

303436 Creedon Group Ltd & GSA Developments Ltd granted permission for Student Accommodation (235 bed spaces) and 37 Built to Rent Apartments at Mill Street, Sweeney's Terrace and Clarence Mangan Road, D8.

305483 refers to a current application for alterations to internal floorplans granted under 303436.

303756 refers to pre application consultation by Molaga Capital Limited for Mixed Use building with student accommodation (317 bed spaces) at 355 South Circular Road, D8.

303435 refers to a grant of permission for 265 Build to Rent apartments, retail/café unit at the former Dulux factory site, Davitt Road, D12.

304383 refers to a grant of permission for 492 Built to Rent residential units at lands at Concord Industrial Estate, Naas Road, Wilkinstown, D12.

5.0 National and Local Planning Policy

5.1 National

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 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 (2018)
- Design Manual for Urban Roads and Streets (2013)
- The Planning System and Flood Risk Management (including the associated Technical Appendices) (2009)
- Urban Development and Building Heights, Guidelines for Planning Authorities (2018)
- Childcare Facilities, Guidelines for Planning Authorities (2001)

5.2 Local

The Dublin City Development Plan 2016-2022 is the operative County Development Plan.

The site in zoned **Z10 Inner Suburban and Inner City Sustainable Mixed Uses**

Objective: To consolidate and facilitate the development of inner city and inner suburban sites for mixed uses, with residential the predominant use in suburban locations, office/retail/residential the predominant uses in inner city areas.

Residential use is permitted under the Z10 zoning objective.

The surrounding area is Z6 (Employment/Enterprise) and Z1 (Sustainable Residential Neighbourhoods).

Section 16.7.2 sets a general height limit of 16m in the outer city, or 24m at rail hubs which are defined as within 500m of Luas stops.

The site is area 2 for the parking standards on **Table 16.1**, which allow a maximum of 1 car space per dwelling, per 100m² of floor space in supermarkets or per 275m²

of other retail or main street uses. Table 16.2 sets a minimum standard of 1 bicycle parking space per dwelling or 150m² of retail use.

Relevant residential policies and development management standards as set out in the plan, including:

QH1 To have regard to the DoEHLG Guidelines on ‘Quality Housing for Sustainable Communities-Best Practice Guidelines for Delivering Homes and Sustaining Communities’ (2007). ‘Delivering Homes Sustaining Communities – Statement on Housing Policy’ (2007), ‘Sustainable Urban Housing: Design Standards for New Apartments’ (2018) and ‘Sustainable Residential Development in Urban Areas’ and the accompanying Urban Design Manual: A Best Practice Guide (2009).

QH6 To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive city.

QH7 To promote residential development at sustainable urban densities throughout the city in accordance with the core strategy, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.

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.

QH20 To ensure apartment developments on City Centre sites are models of international best practice and deliver the highest quality energy efficient apartments with all the necessary infrastructure where a need is identified, to include community hubs, sports and recreational green open spaces and public parks and suitable shops contributing to the creation of attractive, sustainable, mixed use and mixed income neighbourhoods.

Chapter 16.4 sets out requirements for density standards.

Chapter 16.5 refers to plot ratio standards.

SN5 refers to the requirement that developments of 50+ units require an audit of existing facilities in the area and demonstrate how the proposal will contribute to the range of supporting infrastructure.

6.0 Section 247 Consultation(s) with Planning Authority

It is stated that one pre-application consultation took place with the planning authority on the 23rd day of March 2019.

7.0 Forming of Opinion

7.1 Introduction

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 brief detail on each of these elements hereunder.

7.2 Documentation Submitted

7.2.1 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, completed application form, Planning Report and Statement of Consistency, Justification for the development mix on Z10 lands Report, Architectural drawings and Architectural Design Statement, Engineering drawings and Reports, Landscape Plan and Landscape proposal Booklet, Appropriate Assessment Screening, Irish Water Pre-Connection Enquiry letter,-Compliance with DMURS letter, Flood Risk Assessment, Parking Strategy, Traffic & Transport Assessment.

7.2.2 Section 5(5)(b) of the 2016 Act requires the submission of a statement that, in the prospective applicant's opinion, the proposal is consistent with both the relevant guidelines issued by the Minister under section 28 of the Act of 2000.

These statements have been submitted and are contained with the document titled 'Planning Report & Statement of Consistency'.

7.2.3 I have considered all of the documentation submitted by the prospective applicant, relating to this case.

7.3 Planning Authority Submission

7.3.1 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 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 the 5th of December 2019.

7.3.2 The Planning Authority's 'opinion' included the following matters: copies of records of Section 247 consultations, planning history, site location and context, zoning, policy and appendices containing internal reports.

7.3.3 The planning authority's opinion refers to key planning considerations as follows:

Principle of development:

- The Site is zoned **Z10 Inner Suburban and Inner City Sustainable Mixed Uses**. Objective: To consolidate and facilitate the development of inner city and inner suburban sites for mixed uses, with residential the predominant use in suburban locations, office/retail/residential the predominant uses in inner city areas.
The surrounding area is Z6 (Employment/Enterprise) and Z1 (Sustainable Residential Neighbourhoods).
- There is a requirement for mixed uses on Z10 lands and the argument put forward by the Applicant that the Crèche is the mixed use element is not accepted.
- It is considered that the proposed development, involving the provision of 100% residential would contravene the Z10 zoning.
- The proposed development would be premature having regard to the ongoing study of employment/industrial lands (Z6) in the vicinity of the site in the Kylemore/Naas Rd area. The study will inform the future

development, movement, water services, flood risk and amenities and the future statutory planning routes to be taken with these lands.

Plot Ratio & Site Coverage:

- The indicative plot ratio for Z10 is 2.0-3.0.
- Proposed plot ratio is 2.311 if whole site area is used and 2.482 if only the site area of the 2 plots are used.
- Indicative site coverage for Z10 is 50%, proposed 43.5% (combined sites and excludes ROW).

Height/Design & Layout:

Buildings:

Block at No. 86 is curved and ranges in height from 1 to 11 storeys, stepping in at the south at first floor level and at the north at 6th floor level. Highest point is 32.6m.

Block at No 90-96 is u-shaped and is 3 storeys along the northern and southern arms and 5 storeys along the eastern length (excluding the basement) along Jamestown Rd and the access road that separated the two plots. Highest point is 17.78m.

- Plan sets out 24m within 500m of Luas in low-rise areas.
- No objection in principle to height, taking into account national guidelines.
- No objection in principle to the design and layout approach but concerns raised with regard to the scale of the oval tower element in relation to adjoining properties along Jamestown Road.
- VIA required.
- Internal layout of apartments comply with 2018 guidelines.
- Proposed mix of units complies with guidelines.
- Dual aspect (74%)
- Studio/1 bed (41%)
- Block B has been staggered to address impact on adjoining 2 storey houses.
- The Footbridge, referred to in the design statement linking the 2 blocks, has not been indicated on the plans.

Daylight/Sunlight and Overshadowing Study:

- Study shows some overshadowing in the December period, but not excessive.

Open Space:

- Private Open Space (balconies and terraces).
- Communal Open Space (811sq.m required and 1574sq.m is provided)
- No public Open Space and a financial contribution in lieu is proposed.

Childcare:

- Proposed to provide 214sq.m crèche to cater for 20 places.

Community & Social Infrastructure:

- Policy SN5 sets out that developments of 50+ units require an audit of existing facilities in the area and demonstrate how the proposal will contribute to the range of supporting infrastructure.

Access & Car Parking:

- See Transportation Division Report.

Other matters:

- FRA prepared.
- See Drainage Division Report.

Conclusion

The Planning Authority has serious reservations regarding the appropriateness of this proposal given the Z10 zoning, The Planning Authority is of the view that the development of an entirely residential development at this location would contravene the zoning Objective Z10.

Therefore the proposed development would be seriously injurious to the amenities of the area and contrary to the proper planning and sustainable development of the area. In addition it is considered that the proposed development would be premature having regard to the ongoing study of employment /industrial lands (Z6) in the vicinity of the site in the Kylemore/Naas

Road area. In this regard it is recommended that any application for an entirely residential development on this site be refused.

If the applicant pursues the application the following should be addressed:

1. Z10 objective.
2. Study of the employment/industrial lands (Z6).
3. Scale of the oval tower element and its visual impact re: existing residential along Jamestown Rd and on the wider area.
4. Clarification re: footbridge that links west and east blocks.
5. Audit of existing community and social infrastructure.
6. Requirement of Transportation Division.
7. Requirements of Drainage Division.

Other Technical Reports

Transportation Planning Division Report (3rd December 2019)

Further details required, including:

- Clarity regarding the pedestrian crossing of the existing laneway and proposed vehicular basement ramp required.
- Clarity on the proposed access ramp and how the 'shared surface' nature of the ramp will be communicated.
- Details of number and type of traffic generated from the light industrial units to the rear of the site. Traffic Management proposals to address the management of informal parking along the laneway, potential crèche drop off, refuse vehicles, service vehicles, etc.
- Details of waste collection and storage.
- Details of crèche drop offs and how they shall be managed.
- Details of loading bays to be provided.
- Access arrangement for emergency vehicles.
- Details of footpaths
- TTA needs to be reviewed to address informal parking along Jamestown Road.
- A preliminary construction management plan.
- Mobility Plan and Residential Travel Plan.

- Parking: visitor parking, crèche (and staff) car/bike, EVC

Drainage Department Report (not dated).

Further details required, including:

- Basement drainage to comply with the requirements as set out in section 3.18 of the Greater Dublin Regional Code of Practice for Drainage Works.
- Surface water details.
- Details of areas to be TIC.
- Details of phasing of works

Housing Department (13th November 2019)

The applicant has engaged with the housing department in relation to the developments and are aware of the Part V obligations pertaining to the site if permission is granted.

I have reviewed and considered all of the documentation submitted by the planning authority relating to this case.

7.4 Submission from Irish Water

Confirmation of Feasibility issued for this site for 128 no. residential units subject to the following:

Water: New connection to the existing 4” watermain on Jamestown Road is feasible without upgrade.

Wastewater: a new connection to the foul sewer on Jamestown Road will be subject to modelling to confirm capacity in the network and to determine, what, if any upgrade works are required to the waste water network. IW does not currently have any plans to commence upgrade works to its network in this area, therefore, any costs for the upgrade will be borne by the developer.

All infrastructure should be designed and installed in accordance with the Irish Water Codes of Practice and Standard Details. A design proposal for the water and/or wastewater infrastructure should be submitted to Irish Water for

assessment. Prior to submitting the SHD application, the applicant is required to submit these detailed design proposals to Irish Water for review.

8.0 Consultation Meeting

8.1 A Section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 7th day of January 2020, commencing at 14.30 am. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.

8.2 The main topics raised for discussion at the tripartite meeting were as follows:

1. Development strategy for the site to include consistency with land use zoning objective Z10.
2. Study of adjoining employment/industrial lands (Z6).
3. Site interface and right of way through the site, footbridge linking the blocks.
4. Design and impact on adjoining residential amenities.
5. Visual Impact Assessment.
6. Traffic, access & parking strategy.
7. Any other matters.

8.3 In relation to Development strategy for the site to include consistency with land use zoning objective Z10 An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following:

- Compliance with land use objective.

8.4 In relation to the study being undertaken of adjoining employment/industrial lands (Z6) An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following:

- Address the potential impact of the study on the application site and proposed development.

- 8.5 In relation to site interface and right of way though the site and a footbridge linking the blocks An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following:
- Own door units fronting onto an access road to industrial units/warehouse.
 - Details of footbridge.
 - Right of way, level of use and type of vehicles.
 - Interface between the two plots.
- 8.6 In relation to Design and impact on residential amenities An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following:
- Impact on residential amenities of adjoining houses along Jamestown Road. In particular overbearing and overshadowing impact.
 - External Materials and finishes and inter relationship between the two sites which read as two separate entities.
 - Proximity of blocks and residential amenity of prospective residents.
 - Residential amenity for future residents given the adjoining uses. Noise Impacts and potential mitigation measures.
- 8.7 In relation to Visual Impact Assessment An Bord Pleanála representative sought further elaboration/discussion/consideration on the following:
- CGIs and Cross Sections showing the proposal in the context of adjoining developments.
 - Long and short views.
- 8.8 In relation to traffic, access and parking strategy An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following:
- Parking (car and bicycle) strategy, management proposals and rationale/justification for parking.
 - Traffic levels associated with the access road (right of way) and potential conflicts.
 - Crèche set down area & parking.
 - Mobility Management Plan.

8.9 In regards to other matters, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- Matters raised in internal report of PA in relation to drainage and transportation divisions.
- Matters raised in IW submission to ABP dated 12th December 2019.
- Proximity to Severso/COMAH site.

9.0 Conclusion and Recommendation

9.1 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.

9.2 I have examined all of the information and submissions before me including the documentation submitted by the prospective applicants, the submissions of the planning authority and the discussions which took place at the tripartite meeting on the 7th January 2020. I have had regard to both national policy, via the section 28 Ministerial Guidelines and local policy via the statutory plans for the area.

9.3 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 to constitute a reasonable basis for an application** for strategic housing development to An Bord Pleanála.

9.4 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.

10.0 Recommended Opinion

- 10.1 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.
- 10.2 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.
- 10.3 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. Zoning and site context

Further consideration or justification of the documents as they relate to the quantum of residential development proposed at this specific location having regard to the following:

- a) The requirements of objective Z10 zoning relating to mix of land uses and the comments of the planning authority on same as outlined in their Opinion submission dated 4th of December 2019.
- b) Potential impacts on the residential amenities of the proposed units arising from proximity to, and interface with, existing (and potentially future) adjacent light industrial/warehouse land uses on the Z6 zoned lands. In this regard the further consideration/justification should include, inter alia, a noise impact assessment of potential impacts arising from adjacent uses and include appropriate mitigation measures

(if feasible). In addition, the documentation at application stage should include cross-sections of the proposed development relative to existing light industrial/warehouses uses adjacent the site.

- c) Potential conflict arising from trip generation associated with existing (and potentially future) adjacent light industrial/warehouse uses, including along the shared access road through the site. In this regard the further consideration/justification should address the following:
- (i) A Traffic and Transport Impact Assessment (TTIA) of the development, the scope of which is to be discussed in advance with Dublin City Council.
 - (ii) Details relating to the future of the shared access road with neighbouring industrial/warehousing unit and proposals to address potential conflict of vehicular and pedestrian movements.
 - (iii) A Carparking Strategy and Mobility Management Plan.
 - (iv) A response to the matters raised in the Transportation Planning Division report (dated 3rd of December 2019) as indicated in the Planning Authority's Opinion dated 4th of December 2019.

Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

2. Design strategy

Further consideration and/or justification of the documents as they relate to the design strategy for the two blocks at application stage. Some of the documentation submitted at pre-application stage suggests the two blocks are to be treated as aesthetically separate entities, while others implied a more homogeneous approach to the two blocks. The clarification should clearly indicate the palette of materials and finishes to be used on both blocks.

In this regard the further consideration/justification should include, inter alia, a Visual Impact Assessment, this should include long views towards the site from the north, south, east and west. In addition, the

documentation at application stage should include Computer Generated Images and cross-sections showing the interface of buildings and streetscapes.

10.4 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. Rationale/Justification for the proposed building height with regard to the criteria provided in section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018).
2. A housing quality assessment which provides the specific information regarding the proposed apartments required by the 2018 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements. A building lifecycle report for the proposed apartments in accordance with section 6.13 of the 2018 guidelines should also be submitted.
3. A detailed Sunlight and Daylight Impact Assessment.
4. School Demand and Concentration Report, which identifies demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demand.
5. A draft Construction & Environmental Management Plan and a draft Waste Management Plan.
6. Address issues raised in the Drainage Department report included in the Planning Authority's Opinion dated the 4th December 2019.

7. Address issues raised in the Irish Water Submission (report dated 12th of December 2019).

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. Dublin Childcare Committee.
3. Córas Iompair Éireann.
4. Transport Infrastructure Ireland.
5. Health & Safety Authority.

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.

Dáire McDevitt
Planning Inspector

17th January 2020