



An  
Bord  
Pleanála

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

## **Inspector's Report on Recommended Opinion ABP-306197-19**

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### **Strategic Housing Development**

435 apartments, childcare facility and associated site works.

### **Location**

Saint Columbans, Hole in the Wall Road, Dublin 13

### **Planning Authority**

Dublin City Council

### **Prospective Applicant**

Bellwall Limited

### **Date of Consultation Meeting**

3<sup>rd</sup> February 2020

### **Date of Site Inspection**

29<sup>th</sup> January 2020

### **Inspector**

Sarah Moran

## 1.0 Introduction

- 1.1. Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the planning authority, the purpose of this report is to form a recommended opinion as to whether the documentation submitted with the consultation request under section 5(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 - (i) constitutes a reasonable basis for an application under section 4, or (ii) requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

## 2.0 Site Location and Description

- 2.1. The site is located in Donaghmede, in the northern suburbs of Dublin City and close to the boundary with Co. Fingal, close to the junction of the Hole in the Wall Road and the R139 at the Grange Road Roundabout. It is c. 900m east of key district centre lands and Clarehall Shopping Centre, c.1 km southwest of Clongriffin Dart station, c. 4km east of M50/M11 junction (J1/J3) and c. 8km northeast of Dublin city centre. To the north east is the Clongriffin high density mixed use residential/commercial development area, Baldoyle-Stapolin high density residential area and the recently established Father Collins Park, which is a high quality active and passive public open space serving the area. To the northwest is the high density development of Belmayne residential area.
- 2.2. The site (stated area 1.9 ha) comprises two plots, (i) the northern plot, no. 25 Hole in the Wall Road, a private residential dwelling and associated grounds and (ii) the southern plot, institutional buildings occupied by the St. Columban's Missionary religious organisation. Both plots have substantial amounts of mature trees, particularly at site boundaries. Part of the Columban buildings have been extensively damaged by fire. The site is bound by the Hole in the Wall Road to the east, by Clarehall Avenue / R139 to the south, by 4/5 storey blocks within the Grattan Hall apartment complex to the north and by two storey houses within the Grattan Lodge development to the west. There is a small, triangular area of land between the southern site boundary and the Grange Road Roundabout, which contains a pump house. The documentation on file indicates that this area is in private ownership. The

Priory Hall development is to the immediate north of Grattan Lodge. Both the R139 and the Hole in the Wall Road have dedicated bus lanes, with bus stops either direction adjacent the south of the site. The R139 is a QBC and a proposed Bus Connects route.

- 2.3. The site is owned by the prospective applicant. Dublin City Council have provided consent for works to the public road and footpaths at Hole in the Wall Road and the R139.

### 3.0 Proposed Strategic Housing Development

- 3.1. The proposed development involves 435 no. apartments as follows:

UNIT TYPE	NO. OF UNITS	%
Studio apartment	54	13%
1 bed apartment	146	34%
2 bed apartment	232	53%
<b>TOTAL</b>	<b>435</b>	

The development has a stated net residential density of 229 units/ha. There are 39% dual aspect units. The scheme is laid out as four apartment blocks ranging from 5 to 8 storeys in height, with a plot ratio of 1.86. The overall development is up to 27.1m high.

- 3.2. The development also includes:

- Residential amenity facilities and concierge / management suites in Blocks A and D (total area 672.1 sq.m.)
- Childcare facility at ground floor level of Block A (294 sq.m.), to provide 20 no. childcare spaces.
- 311 no. car parking spaces with 39 no. spaces at surface level and 126 spaces at lower ground level and 144 spaces at ground level below podium. The development includes 2-4 car club spaces, as per correspondence on file fro Go Car.

- 860 no. cycle parking spaces and 13 no. motorcycle spaces. A Bleeper Bikes facility is also proposed.
- Communal open space (2,748 sq.m., c. 20% of the site area) and public open space (2,084 sq.m., c. 15% of site area)
- 3 no. ESB substations, plant and waste storage areas.
- Vehicular and pedestrian entrance to Hole in the Wall Road, new pedestrian and emergency access to the R139 to the south.
- Demolition of existing buildings on the site.
- Part V proposals comprising transfer of 43 no. units on site to Dublin City Council.

3.3. The site is sub-threshold for EIA with regard to schedule 5, Part 2, Class 10(b) of the Planning and Development Regulations 2001 (as amended).

## 4.0 Planning History

### 4.1. Columban Missionary Site

#### 4.1.1. Reg. Ref. 2854/17 PL29N.249368

Permission granted for 203 no. apartments, a gym, a childcare facility, a community room and a basement car park in four blocks, 4-5 storeys high. Stated residential density c.149 units / ha. Car parking provision of 1.2 spaces per unit. The Board granted permission subject to amendments comprising the omission of apartments nos. 181,182, 196, 197, 208 and 209 in Block D and the omission of the associated archway, with the stated reason '*In the interests of orderly development and residential amenity*'.

#### 4.1.2. Reg. Ref. 3403/18 ABP-302929-18

Permission granted by Dublin City Council for revisions to Reg. Ref. 2854/17, to develop as a Build to Rent scheme with 22 no. additional apartments, i.e. a total of 225 no. residential units. Stated residential density c. 165 units/ha. I note that the Inspector's Report considered the site to be a 'central and / or accessible' urban location with regard to the guidance on residential density provided in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, in the assessment of proposed residential density in that case,

due to the frequency and proximity of local bus services. The Board decided to dismiss a third party appeal for the following reason:

*Having regard to the limitations imposed under section 34(3A) and 34(3B) of the Planning and Development Act, 2000, as amended, where the Board is restricted in its determination of the application to considering the modifications proposed by the applicant, and where an appeal is limited to a materially significant change to the approved external appearance of the proposed development, the Board considers that the grounds of appeal are outside of the limitations imposed by section 34(A) and 34(B) and decided under the provisions of section 138(1)(b)(i) of the Act, to dismiss the appeal.*

*In deciding not to accept the Inspector's recommendation to grant permission, the Board considered that the appeal cannot be determined by it in view of the provisions of section 34(B) of the 2000 Act and accordingly, dismissed the appeal.*

#### **4.2. 25 Hole in the Wall Road, Northern Part of Development Site**

##### **4.2.1. Reg. Ref. 3203/07**

Permission granted for 48 no. apartments in 3 no. 4 storey blocks.

##### **4.2.2. Reg. Ref. 1237/06 PL29N.218702**

ABP refused permission for 60 apartments in one 4 storey block. There was one refusal reason relating to scale and impacts on residential amenities.

## **5.0 National and Local Planning Policy**

### **5.1. Section 28 Ministerial Guidelines**

5.1.1. Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submissions from the planning authority, I am of the opinion that the directly relevant section 28 Ministerial Guidelines are:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated Urban Design Manual)
- Design Standards for New Apartments – Guidelines for Planning Authorities, as updated March 2018.
- Design Manual for Urban Roads and Streets

- The Planning System and Flood Risk Management (including the associated Technical Appendices)
- Childcare Facilities Guidelines for Planning Authorities
- Urban Development and Building Heights Guidelines for Planning Authorities, 2018.

## 5.2. Dublin City Development Plan

5.2.1. The development site is zoned 'Z1 To protect and improve residential amenities.' It is also within the boundary of Strategic Development Regeneration Area (SDRA) 1. Development plan section 14.8.13 SDRAs:

*"...not all of the identified strategic development and regeneration areas are zoned Z14 in their entirety ...[and] the relevant zoning objective for each area shall be applied to any development proposals."*

Section 15.1.1.1 SDRA 1 North Fringe (Clongriffin-Belmayne). Relevant key points include:

- Over 3,400 new homes and 41,000 sq.m. of commercial floor area in place, also water and drainage infrastructure, a Clongriffin Dart station and public square, sections of the new main street boulevard and redesign of Father Collins Park.
- Aim of providing approx. 8,000 new residential units upon completion.
- Objective to achieve a sufficient density of development to sustain efficient public transport networks and a viable mix of uses and community facilities.
- Objective to promote the creation of a high-quality public domain by establishing a high standard of design in architecture and landscape architecture.
- Objective to use building heights to define key landmark locations, including:
  - Minimum heights of five storeys for the key district centres at Clongriffin rail station and the N32/Malahide Road junction.
  - Minimum heights of four to five storeys for the Main Street boulevard.
  - A landmark structure of 10-14 storeys (office height) adjacent to the rail station.

5.2.2. Also relevant:

- Section 16.4 Density Standards. As per national planning policy.
- Section 16.5 Plot Ratio. Indicative plot ratio of 0.5 – 2.0 for Z1 outer city. Higher plot ratio may be permitted adjoining public transport corridors.
- Section 16.6 Site Coverage. Indicative site coverage of 45% - 60% for Z1 lands. May be higher adjoining public transport corridors.
- Section 16.7 Building Height. Up to 16m in outer city outside designated locations within SDRAs.
- Section 16.10 Standards for Residential Accommodation including a 10% public open space requirement on Z1 lands.
- Section 16.7 building height, maximum height of up to 16m in the outer city.

### 5.3. **Clongriffin Belmayne (North Fringe) Local Area Plan 2012-2018 (extended to 2022)**

5.3.1. There has been considerable progress and delivery of infrastructure in this developing area including:

- a) Approx 3,400 homes completed to date
- b) Approx 41,000 sq.m of commercial floor space constructed
- c) Construction of Clongriffin Rail Station and the No 15 Bus Service, accessing the Malahide Road QBC, which terminates in Clongriffin
- d) The North Fringe Sewer and North Fringe Watermain projects
- e) Significant sections of the main street network, including the distributor roads, completed
- f) Two primary schools, Educate Together and St Francis of Assisi, successful established (in temporary accommodation with progress towards permanent sites being advanced)
- g) The innovative 21ha Fr Collins Park
- h) Park and Ride public car park and town centre plaza at Clongriffin completed

5.3.2. LAP section 7.6 general minimum net density of 50 units/ ha should be achieved subject to appropriate design and amenity standards in the LAP area.

5.3.3. There are no specific height objectives for this location in the LAP.

## 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; Planning Report and Statement of Consistency; Letter of Consent from Dublin City Council (public spaces outside of application site); Part V proposals and Letter of Validation from Dublin City Council; Letter of Feasibility from Irish Water; Planning Report; Community and Social Infrastructure Audit; EIA Screening Report; details of S247 pre-planning consultation and minutes; site layout, elevations, floor plans, sections; details of foul and surface water drainage and roads layout; Transportation Report; landscaping details and Landscaping Masterplan; Archaeological Report; AA Screening Report and Ecological Assessment; Bat Assessment; Daylight Assessment; Flood Risk Assessment; Mechanical and Electrical Services Engineering Report; Residential Travel Plan and Car Parking Strategy.

6.2.2. Section 5(5)(b) of the Act of 2016 requires the submission of a statement that, in the prospective applicant's opinion, the proposal is consistent with both the relevant objectives of the development plan or local area plan concerned, and the relevant guidelines issued by the Minister under section 28 of the Act of 2000. These statements have been submitted, as required.

6.2.3. 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 their opinion in relation to the proposal. These were received by An Bord Pleanála on 24<sup>th</sup> January 2020. The planning authority's 'opinion' included the following matters.

#### 6.3.2. Planning Comment

- Proposed residential density generally acceptable due to the availability of public transport in the area, noting recent precedent for SHD proposals in the wider area.
- Note recent ABP permission for a 9 storey 29.8m high BTR development on Z1 lands at Clare Hall, which exceeded the development plan standard of 16m. Having regard to recent permissions, the overall area is emerging as a higher density area with increased building heights up to 17 storeys permitted by ABP at Clongriffin. It is preferable that the higher portions of the development be located towards the south east and eastern portions of the site. Recommend that the applicant submit a Material Contravention Statement.
- Agrees that combining the two sites will provide for greater efficiencies and coordination of design and for greater efficiencies than adjoining potentially competing sites.
- Notes recent pre-app for a development up to 9 storeys high on lands adjoining the subject site onto Grange Road that are currently occupied by a pumphouse. The comprehensive development of the adjoining lands would be desirable.
- Layout seems cramped. Potential privacy conflicts between blocks in close proximity to each other. Might be preferable to omit Block B, shorten Block C from the north and attach it to Block D1 so as to allow for a more spacious internal layout.
- Recommend that the proposed render finish be replaced by more brick or similar robust materials with limited use of render or lighter panels especially on less sunlit elevations. Any extensive plinth or external elevations should be softened, e.g. with 'green walls'.

- Retention of existing trees on site to be maximised.
- 39% of units are dual aspect. DCC does not consider that this is a 'central or accessible' urban location as per the Apartment Guidelines and instead consider that this is a suburban or intermediate location. A minimum of 50% dual aspect units is therefore recommended. Require justification for any single aspect units with a northern outlook especially where there is no compensatory view or outlook.
- Schedule of Accommodation indicates that 8 no. units will have private open spaces smaller than the minimum requirements.
- Lack of buffers or privacy strips to ground floor apartments. Also issues relating to balconies in close proximity and lack of privacy screens between balconies.
- Limited detail provided on proposed play facilities.
- The level of accessibility to public open spaces should be clarified and public pedestrian circulation be distinguished from resident circulation, also details of gates and boundary treatments.
- Recommend a thorough Daylight and Sunlight Assessment of all public and communal open spaces.
- The green buffer at the western site boundary to Grattan Lodge is similar to that established by previous permissions. Recommend opaque glazing to stairwells facing Grattan Lodge and Grattan Wood.
- Recommend that additional CGIs and photomontages from various locations in the area are submitted.

### 6.3.3. DCC Transportation Planning

- Several specific concerns regard the proposed roads design and layout.
- Maximum of 1.5 car parking spaces per dwelling at this location as per development plan map J. Proposed car parking provision is the same ratio as that permitted under the previous applications at this site.
- No parking provision for the creche. Clarification required re creche parking and set down area.

#### 6.3.4. DCC Drainage Division

- Further clarification of the submitted surface water strategy required.

#### 6.4. **Irish Water**

6.4.1. Irish Water has issued a Confirmation of Feasibility for 437 residential units. The proposed development, as assessed for the Confirmation of Feasibility, identified that no upgrades or consents were required for a water connection. With regards to waste water the following two options for connection are available;

1. Connection to a 525mm sewer across the Hole in the Wall Road, Donaghmeade, directly East of the development. No upgrades or third party consents other than a road opening licence would be required. Delivery of this infrastructure would be by Irish Water with the cost of the delivery borne by the developer.
2. Connection to a 225mm sewer running past the development to the east. This 225mm sewer runs past your development to the East and connects to a pumping station that is in private ownership. In order to connect to this sewer, the applicant would be required to arrange agreement with the owners in advance. The pumping station would also have to be taken in charge by Irish Water and any remedial works to bring it up to Irish Waters standards would be carried out by Irish Water. All scoping and upgrade works to bring this private infrastructure up to Irish Waters standards would be at the applicant's expense. Third party consents may be required in regard to any upgrades.

#### 6.5. **Consultation Meeting**

6.5.1. A section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 3<sup>rd</sup> February 2020. 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 advance and contained the following issues:

1. Design and Layout of Residential Development. Impacts on Visual and Residential Amenities. Building height.
2. Roads and transportation issues; vehicular access; pedestrian and cycle connections; car and cycle parking provision.

3. Drainage and Flood Risk

4. Any other matters.

6.5.3. In relation to the design and layout of residential development, impacts on visual and residential amenities and building height, ABP representatives sought further elaboration / discussion on:

- Nature of proposed development, i.e. whether or not it its Build to Rent.
- ABP requested clarification regarding the ownership / use of the adjacent wedge of land at the Grange Road roundabout and the potential of incorporating these lands into the development site.
- The site has a prominent location and potential visual impacts need to be carefully considered. Concerns in relation to the nature and durability of the proposed external finishes. Need for greater clarity in CGI's & elevations.
- The planning authority has raised the issue of potential material contravention of development plan building height policy.
- Quality of residential accommodation, dual / single aspect units, traffic noise impacts from the R139, overlooking between residential units.
- Public realm and landscaping at ground level, tree retention, areas to be taken in charge, sunlight / daylight analysis of public open spaces, microclimate issues at ground level.
- Applicant to consider potential impacts on adjoining residential amenities.
- Rationale for the location of the creche in the corner of the site, also need for further details of the proposed pedestrian connections to the creche.
- Potential impacts on residential amenities due to traffic noise at units close to the road frontage. Noise interaction with the road in front of the site.
- Also potential noise issues associated with flight paths in close proximity to the site.

6.5.4. In relation to roads and transportation issues; vehicular access; pedestrian and cycle connections; car and cycle parking provision, ABP representatives sought further elaboration / discussion on:

- Vehicular access to the development and in particular the crèche and associated drop off area.
- Car parking provision and management.

6.5.5. In relation to Drainage and Flood Risk, ABP representatives sought further elaboration / discussion on:

- Connections to existing services, issues raised by the Planning Authority.

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

- All bat assessment, ecological assessment, etc. to be up to date, e.g. potential bat roosts, also incorporate findings of previous bat assessments carried out at the site.
- EIA screening, Schedule 7A information to be submitted.
- Archaeology. The site is close to Recorded Monument DU015-069001 & 069002, Grange Church and Graveyard. Refer to NMS.
- Rationale for proposed childcare provision with regard to the Childcare Guidelines, the Apartment Guidelines and the availability of childcare places locally.

6.5.7. 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-306197-19' 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 **requires further consideration and amendment to constitute 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 **requires further consideration and amendment to constitute a reasonable basis for an application** for strategic housing development to An Bord Pleanála.

- 8.3. In the opinion of An Bord Pleanála, the following 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. Design and Layout of Residential Development**

Further consideration or justification of the documents as they relate to the design and layout of the development and to potential impacts on visual and residential amenities, in particular the delivery of high quality façades to the R139 and Hole in the Wall Road, with regard to the prominence of the subject site on the Grange Road Roundabout and its visibility in the wider area. 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. The prospective applicant should satisfy themselves that the design strategy for the site provides the optimal architectural solution for this location and that it is of sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term. The development should achieve strong frontages to both roads, notwithstanding the presence of an intervening site at Grange Road Roundabout and should provide a positive contribution to the public realm at street level including pedestrian and cycle connections, landscaping and boundary treatments. The applicant should also have regard to the long term management and maintenance of the proposed development.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted relating to density and layout of the proposed development.

- 8.4. Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and

Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. 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. Architectural report and accompanying drawings which provide details of the proposed materials and finishes to the scheme including the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances and boundary treatment/s.
4. Photomontages, contextual elevations, cross sections, visual impact analysis, shadow analysis and landscaping details to indicate potential impacts on visual and residential amenities, to include views from the wider area and adjacent residential properties.
5. Cross sections to indicate levels of adjacent public roads and residential properties, access roads and open spaces within the proposed development and the basement / undercroft car park.
6. 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.
7. A microclimate study of the overall development site (to address matters including down draft and wind tunnelling effects).

8. A detailed landscaping plan for the site which clearly sets out proposals for hard and soft landscaping including street furniture, where proposed, to include consideration of the frontages of the scheme to the R139 and Hole in the Wall Road. Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including details of play equipment, street furniture including public lighting and boundary treatments should be submitted.
9. Rationale for proposed play area provision with regard to relevant development plan policy.
10. Tree Survey, Arboricultural Impact Assessment and details of measures to protect trees and hedgerows to be retained at the site.
11. A site layout plan showing which, if any, areas are to be taken in charge by the planning authority.
12. Address issues raised in the report of Dublin City Council Drainage Division included in the Planning Authority's Opinion dated the 23<sup>rd</sup> January 2020.
13. Address issues raised in the report of Dublin City Council Transportation Planning Division dated 17<sup>th</sup> January 2020.
14. Car parking quantum, rationale and details of parking management, including parking for crèche staff. Details of cycle parking provision at basement / undercroft and surface levels. The strategy shall also include details of any areas which are applicable for car club facilities and details for electric vehicle charging.
15. Cycling strategy in any traffic impact assessment, detailing the appropriate provision of bicycle parking in line with national and/or local standards and include details of all surface parking ensuring appropriate longevity and shelter.
16. Childcare demand analysis, including but not restricted to the justification for size of the proposed crèche, the likely demand and use for childcare places and the accommodation of additional requirement resulting from the proposed development.
17. Archaeological Impact Assessment.

18. The information referred to in article 299B (1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.

8.5. Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority
4. Dublin Childcare Committee
5. Minister for Culture, Heritage and the Gaeltacht
6. Heritage Council
7. An Taisce — the National Trust for Ireland
8. Irish Aviation Authority and Department of Defence
9. Dublin Airport 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.

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Sarah Moran

Senior Planning Inspector

11<sup>th</sup> February 2020