



An
Bord
Pleanála

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

Inspector's Report on Recommended Opinion ABP-307285-20

Strategic Housing Development	Construction of 420 no. apartments, childcare facility and associated site works.
Location	Lands at St. Joseph's, Hansfield, Clonsilla, Dublin 15.
Planning Authority	Fingal County Council
Prospective Applicant	Firth Development Unlimited Company
Date of Consultation Meeting	13 th October 2020
Date of Site Inspection	5 th October 2020

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

- 2.1.1. The subject site is located within the area of Blanchardstown, in the administrative area of Fingal County Council. The site is located within the development boundary of Hansfield SDZ, at its southeastern boundary, approx. 425m from Clonsilla train station and approx. 544m walking distance from Hansfield Train Station.
- 2.1.2. The site, which comprises two separate parcels of land, has a stated area of 2.23ha and forms part of a larger site currently under construction. St. Josephs Hospital is located to the northwest. To the south of the site is a residential dwelling accessed from Clonsilla Road/Hansfield Road and the Royal Canal, a proposed NHA, along which is the Dublin Maynooth/Dunboyne rail line.

3.0 Proposed Strategic Housing Development

- 3.1. The proposed development comprises 420 apartments arranged in seven blocks, ranging in height from five to seven storeys.
- 3.2. The following details as submitted by the applicant are noted:

Parameter	Site Proposal
Application Site Area	2.23 ha
No. of Units	420
Density	188 units per hectare

Other Uses	Crèche – 226 sqm in area
Public Open Space	2441sqm of communal open space on site, equating to 11% of site area. Proposed use of Beechwood Park for class 1 open space.
Height	5-7storey apartment buildings and 2 storey crèche
Car Parking	230 spaces, all at surface level
Bicycle Parking	870 cycle spaces
Vehicular Access	From existing/under construction access off Hansfield Road through existing residential development. St. Joseph's Avenue to connect into existing street to the west, 'Park Heights', with this route identified as a Major Feeder Route in the Hansfield SDZ.

3.3. The breakdown of unit types as submitted by the applicant is as follows: 48% 1 bed; 48% 2 bed and 4% 3 bed.

3.4. It is proposed to connect into a proposed cycleway/footpath which travels east-west along the southern site boundary, outside the subject site, and permitted as part of a previous application relating to the adjoining development under construction (reg ref FW17A/0234). Vehicular access is via St. Joseph's Avenue, also permitted under reg ref FW17A/0234, and currently under construction, with St. Joesph's Avenue accessed off Hansfield Road to the north.

4.0 Policy Context

4.1.1. Project Ireland 2040 - National Planning Framework

- 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 27: Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.
- 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.

4.1.2. **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

4.2. **Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031**

Under the RSES a Dublin Metropolitan Area Strategic Plan (MASP) has been prepared to manage the sustainable and compact growth of Dublin. The aim of the Dublin Metropolitan Area Strategic Plan is to deliver strategic development areas identified in the Dublin Metropolitan Area Strategic Plan (MASP) to ensure a steady supply of serviced development lands to support Dublin’s sustainable growth.

The MASP identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities, which includes Hansfield SDZ lands in Blanchardstown, where the subject site is located. The RSES lists phasing/enabling infrastructure relating to the Hansfield lands, as ‘Public Transport, Clonsilla Station, water network and waste water upgrades’.

4.3. **Local Planning Policy**

Fingal Development Plan 2017-2023 (as amended by adopted Variation 2)

- The site is located on lands at Hansfield, which is within the Blanchardstown area.
- Blanchardstown is within the Dublin City and Suburbs boundary identified in the RSES. The MASP, contained within the RSES, has identified Blanchardstown on the North West Strategic Corridor which stretches from Dublin City Centre out along the Maynooth/ Dunboyne lines and DART expansion. This is a key strategic residential and employment corridor along a public transport corridor which contains development opportunities, including the lands at Hansfield and employment at strategic employment hubs such as Dublin Enterprise Zone.
- Hansfield is designated as a Strategic Development Zone (SDZ) and is a planned new sustainable community served by rail via the newly constructed railway station at Hansfield on the Clonsilla to M3 Parkway railway spur.

- As per Variation 2 (adopted June 2020), ‘Hansfield Strategic Development Zone (SDZ) in Dublin 15 continues to work as a successful policy tool with approx. 1,000 units occupied to date on the overall SDZ lands since the inception of the scheme’.
- **Objective SS01** Consolidate the vast majority of the County’s future growth into the strong and dynamic urban centres of the Metropolitan Area while directing development in the core to towns and villages, as advocated by national and regional planning guidance.
- **Objective SS01b** Consolidate within the existing urban footprint, by ensuring of 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and 30% of all new homes are targeted within the existing built-up areas to achieve compact growth of urban settlements, as advocated by the RSES.
- **Objective SS12** Promote the Key Town of Swords and the Metropolitan Area of Blanchardstown, respectively, as Fingal’s primary growth centres for residential development in line with the County’s Settlement Hierarchy.
- **Zoning Objective RA** – Residential Area, the objective of which is to ‘Provide for new residential communities in accordance with approved local area plans and subject to the provision of the necessary social and physical infrastructure’.

Hansfield Strategic Development Zone

- The subject site is location with ‘Zone 6, Canal’ as per the SDZ Planning Scheme, which also states:
 - The establishment of a well-defined boundary along the railway line edge is important.
 - It is an objective to secure the provision of pedestrian and cycle access to the Canal Walkway.
 - The key development parameters for this zone are detailed below.

Zone Area: 12.67 ha

Approximate Density: c. 74/ha

Approximate Number of Dwellings: 940

Quantum of Commercial Floorspace (m²): To accommodate a crèche if required

Quantum of Commercial Floorspace that is retail floor space: 0

Floorspace of community facilities: 0

- Section 5.1 of the Scheme states:
 - ‘The number of dwellings stated as being within each zone, in the following sections, are subject to fluctuation by +/- 5 per cent. However cumulative dwelling numbers for the entire SDZ lands shall be +/- 150 dwellings from the overall target of 3000.’
- Open Space: The Framework Diagram illustrates public open space located along the eastern boundary of the application site.
- Landmark Buildings: The urban design framework diagram illustrates the location of landmark buildings at the northwest and south east corners of the site and in the central area of the St. Joseph’s, at the eastern end of the Phase 2 lands. Landmark buildings help to create a focus or sense of place and legibility for the neighbourhood as a whole.
- Residential Density: Overall net residential density for the development of the SDZ lands will be within the range 35 to 50 units/ ha. However, as with the dwelling type mix, there are locations within the SDZ lands, which are suitable for increased densities. These areas are in close proximity to public transport (Clonsilla train station and the QBC on Ongar Road) and around the village centre as follows:
 - ...Zone 6 - Within 1Km of Clonsilla Train Station.
- It is envisaged therefore that these areas will contain a higher proportion of apartments and townhouses. Given the indicative nature of the Planning Scheme it is considered reasonable to apply a level of flexibility of +/- 150 dwellings within overall Planning Scheme to allow for detailed design to occur.
- Phasing Plan – Section 10. The phasing of development is related to unit numbers rather than being time specific. Similarly, the phasing of development is not location specific, and may occur within any of the Planning Scheme zones, subject to the necessary specific infrastructure and physical connections being provided.

Phasing is broken down into following phases: Phase 1A, 0-500 dwellings occupied; Phase 1B, 501-1000 dwellings occupied; Phase 2, 1001-2000 dwellings occupied; and Phase 3, 2001-3000 dwellings occupied.

- Section 10.2 – ‘...unless all the required works for a particular phase of residential development are completed, the total number of dwelling units that may be permitted will not increase beyond that phase’.

5.0 Section 247 Consultation(s) with Planning Authority

5.1. Email consultation took place on 20th May 2020, where it is stated clarity in relation to a number of aspects were sought including:

- Compliance with specific requirements for Zone 6 of the Planning Scheme
- Compliance with phasing requirements of Planning Scheme
- Integration of the proposal with neighbouring permitted developments
- Quantity and quality of open space provided
- Childcare demand
- Noise assessment
- Ecological assessment
- Car parking provision

6.0 Planning History

FW17A/0234 – Permission GRANTED for 213 residential units (155 residential units applied for).

FW18A/0021 – apartment block to west – 95 units.

FW18A/0162 – Permission GRANTED within the Village Centre for...

FW17A/0078 – Permission GRANTED for Village Green open space.

7.0 Submissions Received

Irish Water

In order to accommodate a connection for water services the following is required:

- Approximately 750m of existing 4” main to be upgraded to 200mm NB. The first 400m is being complete by the applicant under phase 1 as it currently falls within their site. The remaining 350m will be completed by Irish Water under the connection agreement. All the upgrades will be fully funded by the developer.
- The applicant has been advised that there is Irish Water infrastructure (685mm Steel, 1000mm Concrete watermains and a 300mm sewer main) within the site boundaries. The applicant has engaged with Irish Water Diversions section and a confirmation of feasibility of a Diversion has been assessed.
- New connection to the existing network is feasible without network upgrade.

8.0 Forming of the Opinion

- 8.1. 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.

Documentation Submitted by Applicant

- 8.1.1. 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.
- 8.1.2. 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. This statement has been submitted, as required.
- 8.1.3. I have reviewed and considered all of the documents and drawings submitted.

Planning Authority Submission

- 8.1.4. 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, Fingal 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 4th August 2020.
- 8.1.5. Fingal County Council's written opinion includes a description of the site and proposed development, planning history, record of pre planning meeting, policy considerations, departmental reports, and an assessment of the proposed development. The content of the report is summarised as follows:

- Overview: Principle of the development of these lands for higher density development, incorporating increased building height is considered acceptable by the Planning Authority. It is considered that further consideration of the architectural and urban design approach would result in a higher quality design which is consistent with the character of the site as envisaged in the Hansfield Planning Scheme and landmark building designations. Furthermore, the current layout is dominated by surface car parking in a number of locations which would be detrimental to the amenities of the scheme.

The two main issues are set out as follows:

1. Overall Design and Layout

- A more cohesive urban design strategy is required – development lacks a discernible focus and does not effectively respond to its context.
- Design of blocks is repetitious, save for changes in height.
- Design of the buildings as proposed is not considered to adequately respond to the landmark designation. Some of the buildings in this area are the tallest proposed. However, landmark buildings are not solely those which exceed the height of adjoining development and given that the increase in the buildings is incremental, the difference is not such as would distinguish landmark sites from other blocks. Block 5 is a landmark building site and occupies a corner site in the scheme yet is not distinguished from the adjoining blocks. The design of this building requires greater definition of the massing of façade sections and clearer design intent to strengthen the scheme.

2. Car Parking

- Built environment is dominated by car parking. Surface car parking proposed located along St. Joseph's Avenue and between the blocks in Phase 2. Extensive car parking between the two blocks in Phase 3. Open space to eastern edge of Phase 2 is surrounded by parking on two sides, giving rise to safety as well as visual amenity issues. Basement or undercroft preferable, subject to satisfactory architectural and urban design in relation to latter option.

The following detailed issues are set out in the report:

Detailed Issues – Layout and Design

- Proposed block layouts would benefit from greater communal open spaces between blocks to improve the quality of the public realm, surrounding environment and amenity including reducing hard standing and car parking provision in these locations.
- Block 7 provides a strong building line along Hansfield to the east. It appears from the elevation drawings of Block 7 that there are pedestrian entrances into the scheme along this block. These should also be included on the site layout plan. The scale of the building in this location should also be considered in the context of the form of development located to the east.
- The proposed blocks are identical in terms of proportions, materials and finishes. The elevational treatment and proposed window/ door alignments and locations should be considered further to create more interest and rhythm across the individual elevations and contiguous elevations. Similarly, the balconies are predominantly external, protruding balconies. The introduction of integrated balconies would be one means of creating variety.
- The apartment buildings are all accessed via central entrances. Including own door units at ground floor level would be a means of enhancing the activity along St. Joseph's Avenue in particular.

Detailed Issues – Unit Mix

- 48% one bedroom units, 48% two bedroom units and 4% three bedroom units. The applicant has indicated that across St. Joseph's as a whole, the residential mix would be 37% one bedroom; 40% two bedroom, 17% three bedroom and 6% four

bedroom. A more balanced housing mix would include a larger percentage of three bedroom units and there is potential within the current scheme to provide this.

Detailed Issues – Residential Amenity

- 33% of the units are dual aspect. Given the suburban and greenfield nature of the site, it is considered that a higher percentage of dual aspects units is desirable.
- Proximity of Block 5 to the lower density housing to the east, and particularly, the potential for overlooking from balconies into the private amenity space of units 31 and 33 along St. Joseph's Avenue.
- Amenity value of communal open space C, situated as it is between Block 5 and two areas of car parking, is questionable.
- Of the apartments studied in the daylight, sunlight and overshadowing study, no data has been provided on the average daylight factors for kitchens. It is considered that the study should be expanded to include this information.
- Private amenity space for a number of apartments is located adjacent to the entrances to the apartment buildings. It is considered that the floor layout for these units should be amended to increase the separation distance between the entrance and the balcony/terrace in order to provide greater privacy for these spaces.

Detailed Issues – Access and Transportation

- The Traffic and Transport Assessment does not include assessment with all committed development. The Assessment should be expanded to include this.
- Internal transportation report states the following:
 - Deficit of parking provided with no visitor parking available.
 - Clarification on the capacity and staffing of the crèche and consequently the parking and set-down area for it.
 - Bicycle parking should be provided within each block for each residential unit. A schedule should be submitted which details the residential cycle parking for each block.
 - Car parking spaces in surface parking areas are undersized.
 - Placing of traffic calming ramps.

- Connections to adjoining development to the west.
- EV charging points.
- Boundary and lighting to shared pedestrian and cycleway.

Detailed Issues – Open Space and Landscaping

- Applicant proposes to allocate lands in Beech Park to meet public open space requirements. It should be noted that while Beech Park has been maintained by Fingal County Council for many years it has yet to be taken in charge. It is considered that the transfer of lands between Castlethorn Developments and Fingal County Council should be finalised as part of this application. Notwithstanding the proposal to allocate lands in Beech Park, there is a shortfall of public open space to serve the development. This could be addressed by way of financial contribution. However, it is noted that the Planning Scheme illustrated the provision of open space along the eastern boundary to the site. This is where Block 7 is located. If this piece of open space is not to be delivered, and taking into account the linear nature of the open space provided in the permitted scheme to the north (Reg. Ref. FW17A/0234), then the remaining open space in the development needs to be of high quality.
- Proposed pedestrian path and cycleway at the south of the site would make a positive contribution to the scheme. There is a considerable gradient difference between this site and the adjoining land to the west which, it is believed, is not fully represented in the drawings submitted. A detailed section drawing of this location should be prepared and submitted with the planning application to demonstrate that the route can be development. Details of agreements reached with the adjoining site owner in respect of the route should also be submitted.
- Additional details need to be submitted regarding play provision in the communal areas. While play areas have been illustrated, the provision for different age groups has not been shown.
- The ESB substations and meter rooms are located in 2 different areas of open space. The Planning Authority does not encourage the location of such infrastructure in public open space and a revised location is sought (Objective DMS 18 of the County Development Plan refers).

Detailed Issues – Water Services

- The proposed development appears to follow the drainage strategy approved under Phase 1 (FW/17A/0234). Additional details are required in respect of this as outlined in the report received from the Water Services Section in Appendix C. The Fingal County Development Plan 2017-2023 supports the use of SuDS and green infrastructure as an integral part of surface water management. It is recommended that the surface water strategy is examined and revised to incorporate greater use of green infrastructure. The Development Plan, in particular, promotes the use of green walls and roofs and these should be incorporated into the proposal.

Detailed Issues – Childcare Facility

- Detailed information in relation to number of spaces to be provided. Information should demonstrate that adequate childcare provision has been made for the wider area given that a single facility is proposed to serve the 3 phases of St. Joseph's.

Detailed Issues – Other Issues

The following is requested to be submitted:

- Flood risk assessment;
- A statement in accordance with Objective DMS03a of the County Development Plan outlining:
 - Compliance with the sequential approach in relation to development of the area, potential for sustainable compact growth,
 - The scale of employment provision and commuting flows,
 - Extent of local services provision i.e. administration, education- particularly third level, health, retail and amenities,
 - Transport accessibility,
 - Environmental sensitivities, resources and assets and,
 - Current and planned infrastructure capacity.
- Full details of the proposed drainage and water supply network (including calculations and long sections).
- Social infrastructure audit.

9.0 The Consultation Meeting

9.1. A Section 5 Consultation meeting took place via a Conference Call on the 13th October 2020, commencing at 14.30. 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.

9.2. 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. Planning Policy Context – SDZ
2. Layout and Public Realm – surface level parking strategy; open space location, quantity and quality; pedestrian/cyclist connection west and south; western tree lined boundary.
3. Block Layout and Design
4. Residential Amenity
5. Transportation
6. Water Services
7. Any Other Matters

9.2.1. Point 1

In relation to the SDZ for the area, ABP representatives sought further elaboration/discussion/consideration in relation to:

- The number of units currently occupied in the SDZ area.
- SDZ requirements for Zone 6, the framework plan and phasing programme – clarify compliance with density figures for Zone 6; dwelling mix; compliance with framework plan and delivery of public open space on the site as identified in the SDZ; deliverability of connection to Canal walkway/towpath; deliverability of Feeder Road connection west; delivery of Village Green and when is that anticipated; improvements to Clonsilla Station and whether these have been undertaken as per the SDZ, which states requirement for the creation of a second entrance to Clonsilla Station at the western extremity of the existing platforms to facilitate access from the

SDZ lands, incorporation of a ticket booth, and a pedestrian bridge over the Royal Canal.

- Material Contravention to be submitted concerned with dwelling mix, height, and parking. To further consider range of other potential issues arising.
- Height strategy and SDZ - consideration of section 3.2 of the Urban Development and Building Heights Guidelines.
- Main area of proposed open space referred to (Beech Park) is outside the SDZ area and is not mentioned in the SDZ planning scheme. Ensure proposal addresses open space requirements of SDZ.
- Need for clear reasoning and justification in relation to any proposed deviations from the approved planning scheme.

9.2.2. **Point 2**

In relation to Layout and Public Realm, ABP representatives sought further elaboration/discussion/consideration in relation to:

- Rationale for car parking strategy which proposes all parking at surface level, any alternatives considered, and impact of this approach on the public realm and quality of the open space.
- Dominance of car parking, particularly between Block 2/3, Blocks 4/5, west of Block 5 and also around Blocks 6 and 7.
- Connection of adjoining pedestrian/cycle path to existing path along Canal, as required by SDZ and any difficulties envisaged in achieving this. Documentation needs to be clear on how and when this is to be delivered, in accordance with phasing programme set out.
- Documentation needs to be clear on how and when connection to road to west will be fully delivered and connected into from both sides, in accordance with phasing programme set out.
- Trees on adjoining site to west, which is a townland hedgerow boundary – consider impact from development on these adjoining trees, which have been retained as part of development to the west. Consider extent of tree survey report, which at present does not consider these trees.

9.2.3. **Point 3**

In relation to the Block Layout and Design, ABP representatives sought further elaboration/discussion/consideration in relation to:

- Rationale in relation to the height strategy, scale and massing of proposed blocks. Compliance with SDZ in relation to height.
- SDZ and landmark building locations. Not clear on what makes the proposed blocks 7 and 1 landmark buildings.
- Further detail in relation to architectural detailing and finishes.

9.2.4. **Point 4**

In relation to Residential Amenity, ABP representatives sought further elaboration/discussion/consideration in relation to:

- Sunlight daylight analysis relating to all the blocks.
- Design and function of public open space.
- Quality of the public realm.

9.2.5. **Point 5**

In relation to the Traffic and Transportation, ABP representatives sought further elaboration/discussion/consideration in relation to:

- Traffic Assessment – note that delivery of east-west connection of St. Joseph's Avenue with adjoining site is not included in the analysis.
- Documentation needs to be clear on how and when connection to road to west will be fully delivered and connected into from both sides. To consider also level differences, ditch and retention of trees in this area. This phase is the final phase of development in Zone 6. Delivery of feeder road is required.
- Connection of cycle-pedestrian point to the west – terminates at the ditch as per submitted drawings. Details and certainty in relation to delivery of the connection to the canal walkway is required as this is a key element of Zone 6, as per the SDZ planning scheme.

9.2.6. **Point 6**

In relation to the Water Services, ABP representatives sought further elaboration/discussion/consideration in relation to:

- Surface water management and addressing of issues raised by PA.

9.2.7. **Point 7**

In relation to the Any Other Matters, ABP representatives sought further elaboration/discussion/consideration in relation to:

- Advised that there is no provision for further information at application stage, all details to be submitted at application stage; ensure consistency between documentation submitted by various consultants.
- A robust assessment is required in relation to SDZ planning scheme.
- Consideration of EIA Screening/EIAR requirements, as per the legislation, having regard to the scale of the development, phases 1-3.

9.2.8. 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 307285' 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.

10.0 **Conclusion and Recommendation**

10.1. 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.

10.2. 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.

10.3. 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** in order to constitute a reasonable basis for an application under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

10.4. 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.

11.0 Recommended Opinion

11.1. The Board 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.

11.2. 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.

11.3. 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. Further consideration/justification of the documents as they relate to the Hansfield SDZ, including delivery of identified open space on site as per the

framework plan, details and certainty over timing of delivery of east-west feeder road, details and certainty in relation to connection to canal walkway, delivery of village green, details of timing and delivery of improvements to Clonsilla Station, details of compliance with density for Zone 6, height strategy, and unit mix as per the SDZ planning scheme, as well as all other aspects of the planning scheme which affects the development.

2. Further consideration of the documents as they relate to the overall layout of car parking at surface level and the impact of this arrangement on the creation of a high quality public realm, visual impact on residents of the scheme, and delivery of quality open space.

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

11.5. 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. Review of submitted Traffic and Transport Assessment, which should include the east-west feeder road, as identified in the SDZ, and which is required to be delivered as part of the SDZ.
2. Site layout plan to be reviewed in context of DMURS including consideration of impact of parking at surface level on the public realm, and layout of parking spaces, noting that DMURS indicates perpendicular parking should generally be restricted to one side of the street to ensure parking does not dominate the street.
3. Detailed drawings, cross-sections, elevations and additional CGIs of the site to demonstrate that the development provides an appropriate interface with the adjoining lands and provides for a quality public realm.
4. Consideration of the scale of blocks 6 and 7 and internal layout of these blocks with long internal corridors.

5. In addition to issue of Block 7 being proposed on land identified as public open space in the SDZ, consideration of appropriate interface and set back from Hansfield Road, as established by the SDZ.
6. Details of the proposed materials and finishes to the scheme including the treatment of balconies. 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.
7. Details of boundary treatment across the site, including any boundary proposed with the pedestrian/cyclist route to the south and boundary treatment to Hansfield Road to the east.
8. A plan detailing the hierarchy and function of public open space across the site, including the recreational needs of children of different age brackets, as per the Design Standards for New Apartments Guidelines. Cross sections of proposed open space north of Block 7 should also be submitted.
9. Review of tree survey and arboricultural report submitted, to include consideration of existing trees to the west of the site, which may be impacted by the proposed development and which are to be retained. The survey should also include a clear plan of trees to be removed and retained as part of this development and measures to ensure protection of those proposed to be retained.
10. Ecological Impact Assessment.
11. Wind micro-climate study, including analysis of balconies and any upper level roof gardens.
12. Internal daylight/sunlight analysis.
13. Noise Impact Assessment.
14. Mobility Management Plan.
15. A detailed Construction Environmental Management Plan.
16. 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, including its specific planning policy requirements.

17. A building 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.
18. Detailed SUDS strategy for the site and Flood Risk Assessment.
19. Response to issues raised by the Parks and Green Infrastructure Division, Transportation Planning Section, Water Services Division and Architects Department of FCC, as per the reports submitted in Appendix C of the Planning Authority Report, received on 4th August 2020.
20. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.
21. 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, unless it is proposed to submit an EIAR at application stage.
22. An Appropriate Assessment screening report and/or Natura Impact Statement.

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. Waterways Ireland
5. Inland Fisheries Ireland
6. Minister for Culture, Heritage and the Gaeltacht (archaeology and nature conservation)
7. Heritage Council (nature conservation)
8. An Taisce (nature conservation)
9. Coras Iompair Eireann
10. Commission for Railway Regulation
11. The relevant Childcare Committee

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Una O'Neill
Senior Planning Inspector

2nd November 2020