



An
Bord
Pleanála

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

**Inspector's Report on
Recommended Opinion
ABP-308172-20**

Strategic Housing Development

260 no. apartments and associated site works

Location

Site at Belmayne P4, corner of Churchwell Road and Churchwell Crescent, Belmayne, Dublin 13

Planning Authority

Dublin City Council

Prospective Applicant

Balgriffin Park Limited

Date of Consultation Meeting

28th January 2021

Date of Site Inspection

17th December 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 development site is an undeveloped flat, rectangular plot located at the south western corner of the Belmayne urban district, identified as 'P4'. It is accessed via Belmayne Avenue, off a roundabout on the R139. The R107/Malahide Road/R139 junction is nearby to the southwest. The Mayne River is located c. 400m to the north. The site is bound as follows:

- Belmayne Main Street along the southern site boundary. Undeveloped lands to the south and west. There is a proposed Bus Connects corridor linking Clongriffin and the city centre along Main Street.
- Churchwell Road to the north (Block P3). A 3 storey building with own door duplex units at ground floor level and apartments overhead with 4 storey bookend apartment elements.
- Churchwell Crescent to the east (Block P5). A 5 storey over basement apartment block. Belmayne Main Street is further to the east of the site, with 6 storey frontages and some commercial units at ground floor level.
- Existing pedestrian/cycle route along the western site boundary.

3.0 Proposed Strategic Housing Development

- 3.1. The proposed development involves the following key points:

Site Area	c.1.4 ha gross / 1.22 ha net
No. of Residential Units	Total 260 units 4 no. studios (1%) 103 no. 1 beds (40%) 137 no. 2 beds (53%) 16 no. 3 beds (6%)
Other Development	Residential support facilities: 109 sq.m. Reception, communal offices and meeting rooms: 191 sq.m.
Height	2-7 storeys
Residential Density	213 units/ha
Amenity Space	3,344 sq.m. 30% of site area
Roads	Vehicular access from Churchwell Crescent
Cycle Parking	Total 400 no. spaces 384 no. undercroft spaces for residents, 1.5 spaces/unit
Car Parking	Total 199 no. spaces 180 undercroft spaces for residents, 0.69 spaces/unit 19 on-street spaces at Churchwell Road including 4 no. car share spaces 8 no. motorcycle parking spaces
Part V	26 units to be agreed with DCC

3.6. The development is laid out around two internal courtyards at podium level over an undercroft car park. Communal amenity space is provided at the internal courtyards. The apartments are accessed via 6 no. cores and from own door access at ground floor level. There is vehicular access to the undercroft car park from Churchwell

Crescent at the eastern site boundary. There are active frontages at ground floor level, with apartments and duplex units that have own door access. The proposed communal facilities are located on the ground floor of Core 1, at the south western corner of the development facing Main Street and the pedestrian/cycle route. The communal facility contains a reception, offices, sanitary facilities and two multipurpose rooms. A residential support facility is also located in this area, including a management company/concierge base. The pedestrian/cycle route along the western side of the site is to be integrated into the layout.

- 3.7. Surface water from the development is to discharge via Hydrobrake to an existing attenuation tank to the north of the development site and then to the River Mayne via an existing outfall. The development is to connect to the existing foul drainage network and foul sewer at Churchwell Crescent to the east of the site. The proposed water supply is via the existing watermain to the north of the site on Churchwell Road. The submitted Site Specific Flood Risk Assessment indicates that the site is entirely located within Flood Zone C.
- 3.8. An AA Screening Report and an EIA Screening Report are submitted.

4.0 Planning History

4.1. 0354/02 PL29N.131019

- 4.1.1. This is the parent permission for the original Belmayne development. Permission was granted for a mixed use development including residential units; public open space; the southern carriageway of the Parkside Boulevard, which connects the Malahide Road to the Hole in the Wall Road; and the creation of a Main Street, which connects the Grange Road extension to the eastern boundary of the development site. The application included a masterplan for the lands which identified 55 no. different cells (P1 – P55) and a phasing plan for the development of the lands. The development site was identified as Cell P4. Permission was originally granted for a 6 storey apartment block at the development site. This permission has now lapsed. The application was subsequently amended by DCC Reg. Ref.: 4004/04 and 1359/07.

4.2. 4315/03 PL29.207192

- 4.2.1. Permission granted for a mixed use development comprising 2,180 dwellings, community, retail and commercial uses; the primary school; the Grange Road and Hole in the Wall Road extensions; and the linear park and the town square. This application represented a portion of Phases 2 and 3 and all of Phase 4 and 5 of the overall masterplan permitted under 0354/02. The permission was subsequently amended by permissions DCC Reg Ref 2029/06, 3511/06, 1306/07 and 1359/07, which included the provisions of ESB substations and utilities rooms, development names, security kiosks, entrance features, and revised phasing.

4.3. Parkside Developments

- 4.3.1. There have been numerous permissions on the lands east of Belmayne Avenue, known as 'Parkside', as summarised in section 3.2 of the applicant's submitted Planning Report. The most recent permission, ref. ABP-305623-19, granted permission for 282 apartments and associated facilities including a linear park along the River Mayne on lands at the northern end of the Belmayne district in January 2020. This development is known as 'Parkside 4'. Permission was also granted for 64 houses and 32 apartments under Reg. Ref. 3791/18, 'Parkside 5A', located at a site to the east of Belmayne Avenue and southeast of Belmayne Educate Together school.

4.4. Belmayne Main Street Part VIII

- 4.4.1. Dublin City Council has approved a Part VIII scheme to complete Belmayne Main Street to the south, east and west of the development site including footpaths and cycleways; bus lane; signalised junctions at Belmayne Avenue/Belmayne Main Street and at Belmayne MainStreet/Malahide Road; pedestrian/toucan crossings and landscaping works.

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 December 2020)
- Design Manual for Urban Roads and Streets (DMURS)
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (including the associated Technical Appendices)
- Childcare Facilities Guidelines for Planning Authorities
- Urban Development and Building Heights Guidelines for Planning Authorities

5.2. **Dublin City Development Plan 2017-2022**

5.2.1. The City Development Plan identifies the North Fringe Clongriffin and Belmayne areas as a key Strategic Development and Regeneration Area (SDRA 1) with the area around the Malahide Road junction R107/R139 identified as a Key District Centre.

5.2.2. The development site has the zoning objective Z14:

'To seek the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential and "Z6" would be the predominant uses.'

5.2.3. Development Plan Map J- Strategic Transport and Parking Areas. Site is located in Area 3. Development plan table 16.1 permits a maximum provision of 1.5 no. car parking spaces per residential unit in Area 3.

5.3. **Belmayne Clongriffin Local Area Plan 2012-2018 (as extended until 2022)**

5.3.1. The development site is located within Phase 4 of the LAP. The following objectives are noted in relation to the development site:

- The Movement and Transport Strategy indicates the continuation of Belmayne Main Street westwards to meet the Malahide Road/R107.
- North Fringe Key District Centre (KDC) at the R139/ R107/Malahide Road junction including the undeveloped lands to the south and west of the development site. This area is to have a higher order retail/commercial status.
- 4-5 storey height along Main Street

- Indicative density 50 units/ha.

5.4. Draft Belmayne Town Centre and Belcamp Lane Masterplan

5.4.1. Public consultation was carried out on the Draft Masterplan in 2020. The Masterplan seeks to facilitate the development of 24 ha of lands at Belmayne and Belcamp Lane, including the delivery of a new Town Centre and residential area focused on the Malahide Road junction (R139/R107). The Masterplan area includes the development site and adjoining lands to the south and west. The following points are noted in relation to the development site:

- The development site is indicated as Residential Area 4.
- The completion of Belmayne Main Street along the southern site boundary is a key objective of the Masterplan.
- Local pedestrian/cycle link along the western site boundary, connecting to the R139 to the south and Clare Hall.
- Residential land use at development site, mixed use at south western corner of the site adjacent to the KDC.
- Fig. B5.1 Built Form and Height indicates 5-6 storeys along the Main Street site frontage, 4 storey at northern end of site.
- Neighbourhood park indicated on the southern site of Main Street, nearby to the south east of the development site.
- Suggested density of 250 units/ha for P4.

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; Material Contravention Statement; Childcare Assessment; EIA Screening; AA Screening; Design Report; Schedule of Accommodation (including Housing Quality Assessment); Architectural Drawings; Infrastructure Design Report; Site Specific Flood Risk Assessment; Construction and Environmental Management Plan; Traffic and Transport Assessment; Mobility Management Plan; DMURS Statement; Infrastructural Drawings; Landscape Design Report; Landscape Drawings; Daylight & Sunlight Assessments.

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. Material Contravention Statement

6.3.1. The documentation submitted includes a Material Contravention Statement, which addresses the issues of building height and residential density. The points made in relation to each matter may be considered separately as follows.

6.3.2. Building Height

- As per development plan section 16.7.2, sites subject to LAPs are to be assessed based on the specific height range stipulations contained within same. The LAP provides:

The height strategy for the LAP will seek positive integration of new building height with established character. Locations identified for special height character are the designated Key District Centres (in general 5 storeys minimum) and the

Main Street Boulevard axis (in general four to five storeys). Heights of 2-6 storeys (including a set back at the top floor of a 5/6 storey building) may be facilitated subject to quality design criteria and set back requirements along the river corridor to complete the urban form of pavilion buildings to complete Marrsfield. One location for a landmark profiled building (10-14 storey office height equivalent) is designated adjacent to Clongriffin Rail Station. In other locations, where 4 storeys residential height is proposed, some flexibility will be allowed on the height equivalent (13m) to achieve design improvements to the façade.

- The Belmayne and Belcamp Lane Draft Masterplan indicates building heights for the development site of 5-6 storeys along Main Street to the south and 2-4 storeys to the north.
- The proposed development ranges in height from 2 to 7 storeys, therefore one storey higher than the maximum height prescribed in the LAP.
- It is submitted that, should the Board consider this to represent a material contravention of the development plan, it can grant permission under Section 9(6) of the 2016 Act.
- Section 37(2)(b)(i) of the 2000 Act: The proposed development is a “Strategic Housing Development”, as defined under Section 3 of the 2016 Act.
- SPPR1 of the Building Height Guidelines supports increased building height and density in locations with good public transport accessibility. Belmayne Main Street will link the site to Clongriffin station in approximately 1.6km (12 minutes’ walk time). This road project has been approved for LIHAF funding and is currently 60% complete. Malahide road-Main street is a proposed future Bus Connects route connecting Clongriffin and the city centre. It is submitted that the development site therefore represents an “Intermediate Urban Location” as per section 2.4 of the Apartment Guidelines and is suitable for higher density development. In addition, the site is currently served by has frequent Dublin Bus services (Nos. 15 and 27) to and from the city centre, which are available within 5 minutes’ walk.
- The development site is adjacent to the designated Key District Centre at the R107/Malahide Road/R136 junction. The existing apartment schemes along Belmayne Main Street range in height from 5-6 storeys. The current proposal

seeks to continue this urban edge along Main Street with the higher elements located at the south western corner of the block, addressing the proposed KDC. The lower elements front onto Churchwell Road and are similar in height to the existing development in this location.

- The orientation, design and layout of the scheme ensure that all units have access to high quality daylight and sunlight and that all of the open spaces between blocks are not excessively shadowed. A daylight/sunlight analysis confirming this is submitted with the application.
- Due to the flat, low lying nature of the existing site, and to the height and orientation of the proposed blocks, the development is unlikely to create negative local wind microclimate impacts.
- The submitted analysis sets out how the application complies with the criteria of the Building Height Guidelines as per SPPR 3 of same. It is submitted that DCC Planning Dept. concurred, during pre-planning consultations, that the site was appropriate for additional height above the LAP stipulation having regard to its specific locational context and the assessment criteria now established in national guidance.

6.3.3. Residential Density

- The subject lands are located within LAP Phase 4 (Belmayne). The LAP indicates a density range of 50-60 units per hectare for the development site. However, this density range is stated as “indicative” and is not a strict policy maximum. In addition, the LAP states that densities should achieve 50 units/ha in general with higher densities along Main Street.
- The Draft Belmayne and Belcamp Lane Masterplan now identifies that the site is in Residential Area A and is considered suitable for a residential density of c. 250 units/ha.
- The Statement of Consistency outlines in detail how the proposed development of c.213 units per ha is consistent with national, regional and local planning policy including the Draft Masterplan for this area, is appropriate for this location and results from the suitability and quality of the apartment design which also reflects the scale of development already achieved on developments to the east.

- Given the above it is contended that a material contravention of the LAP in relation to density does not arise as a result of the proposed development.

6.4. **Planning Authority Submission**

6.4.1. 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 (DCC), 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 the 12th October 2020. The planning authority's 'opinion' included the following matters.

6.4.2. DCC Planning Comment

- It is considered that the development is generally consistent with Development Plan and LAP objectives (as amended by national guidelines).
- The applicant has addressed the proposed density in relation to the LAP in the Material Contravention Statement. The density would be below the target density set out in the Draft 2020 Belmayne and Belcamp Lane Masterplan. The density is considered acceptable due to the location within a Key District Centre; location alongside a major radial route; availability of direct access to public transport; also current national policy on residential development and urban consolidation, which supersedes the objectives of the LAP. Also notes recent and local precedents for higher densities including ABP-302993-19 at Clare Hall (c. 332 units/ha) and ABP-305943-19 at Newtown, Malahide Road (c.314 units/ha). It is considered overall that the development will help stimulate the vitality and viability of this long undeveloped portion of KDC 1, a designated city urban development area, in terms of supporting proposed and existing retail, commercial and community functions of the mixed-use area.
- The proposed layout differs from the perimeter block layout for P4 indicated in the Masterplan and contrasts with adjoining blocks due to the gaps in street elevations to the south and north. It would be useful as a matter of reference to be provided with an outline of the previous intended development for Cell P4 traced onto the proposed layout and elevations.
- PA notes that specific height restrictions have now been superseded by the Building Height Guidelines. Note permission for 29.8m high 9 storey development

at Clare Hall ref. ABP-302993-19. No objection to proposed height within a KDC location subject to consideration of impacts on privacy and access to daylight and sunlight. It is considered that the south western corner of the scheme in particular has scope to accommodate some form of local landmark element.

- The proposed elevations, even with gaps, will appear fairly continuous and will maintain the framing required to provide visual containment to the wide cross section of Main Street.
- The Housing Quality Assessment should provide comparison with Apartment Guidelines minimum requirements.
- Suggests that the prospective applicant supply a residential unit type mix for the developed portions of Belmayne. DCC notes that the development appears to be in accordance with the standards.
- It would be beneficial if the northern 3 bed apartments benefited from either a western or eastern outlook in addition to their northern outlook. Notes that external terraces and living spaces of duplex units face north. If there is no opportunity for all of the first floor duplexes to be flipped south, then the southern half of the central apartment spine between the two podiums could be omitted to maximise access to sunlight. It is also recommended that some level of projection forward of the building envelope to the recessed balconies serving units such as the northern Apts. 193 and 230 be provided to allow some degree of western aspect.
- Further details of the relationship between private balconies and the public realm are required, i.e. height differences, landscaping, 'buffer strip'. Also vertical privacy screens and opaque glazing to individual balconies.
- Further details of the proposed children's play area are required. Need to differentiate between play area provision and communal open space provision, spaces cannot be double counted. Note large areas of undercroft vents within communal open spaces. It would be preferable if the communal open space was provided as a single tranche.

- Notes lack of childcare provision and conclusions of submitted Childcare Assessment. Recommends that applicant consult with the Dublin City Childcare Committee.
- Recommends further analysis of daylight and sunlight impacts on adjoining properties and within proposed residential units. Also further consideration of potential overlooking between residential units and measures to address/obviate same.
- DCC Housing Section notes that the applicant has not engaged with them regarding Part V.

6.4.3. DCC Drainage Division

- Clarification on surface water and flood risk management required regarding capacity of proposed attenuation storage tank and location of proposed outfall Hydrobrake.

6.4.4. DCC Transportation Planning Division

- Relationship with DCC lands along the western boundary is unclear. Applicant to liaise with the Transportation Planning Division
- Further details of waste collection point along Churchwell Crescent required.
- The proposed 4 no. car share spaces should be clearly annotated on relevant plans within the application together with a letter of support from a car club provider confirming their commitment to the car sharing scheme for the development and the immediate area.
- Details of car parking management required including a Residential Travel Plan.
- Division is generally satisfied with the quantum of cycle parking.
- Concerns with specific elements of car parking layout and proposed cycle storage within the undercroft car park.
- Applicant to consider increasing the provision of electric vehicle charge points.
- Applicant to clarify areas to be taken in charge.
- Preliminary Construction Management Plan to be submitted including construction traffic impacts and cumulative impacts.

- DCC Transportation Planning Division is broadly satisfied with the scope of documentation submitted.

6.4.5. DCC Parks, Biodiversity and Landscape Services

- No objection in principle.
- Applicant should consider the provision of accessible communal open space at roof level to allow access to sunlit areas and benefit from elevated views.
- Requires clarification of relationship between streetscape, tree planting and underground services.
- Ecological Impact Assessment by a qualified ecologist required to verify if impacts to existing habitats at the site are adequately quantified and addressed. Detailed consideration of potential impacts on birds and bats required as per DPHLG guidance.
- Further details required for AA screening and EIA screening.

6.4.6. PA Conclusion

While the proposal would appear to be broadly consistent with the proper planning and sustainable development of the area and national policy with regard to apartment accommodation there are a number of concerns and clarifications of the proposal required which should be addressed prior to the submission of the final application including the issues raised by DCC Drainage Division and Transportation Planning Section.

6.5. **Irish Water Submission**

6.5.1. The following points are noted:

- Irish Water has issued a Confirmation of Feasibility for 400 residential units at the development site.
- The development is a standard connection requiring no network or treatment plant upgrades for water or wastewater by the customer or Irish Water.

6.6. Consultation Meeting

6.6.1. A section 5 Consultation meeting took place on 28th January 2021. 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.

6.6.2. 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. Consistency with National Planning Policy and with the Draft Belmayne Town Centre and Belcamp Lane Masterplan and the Belmayne Clongriffin Local Area Plan 2018-2022 (as extended) including residential density, housing mix and building height.
2. Design and layout of development including the public realm and interaction with the adjacent Greenway and Belmayne Main Street, provision of public open space, play area and communal facilities, also potential impacts on residential amenities.
3. Traffic and Transportation Issues
4. Any other matters

6.6.3. In relation to consistency with National Planning Policy and with the Draft Belmayne Town Centre and Belcamp Lane Masterplan and the Belmayne Clongriffin Local Area Plan 2018-2022 (as extended), ABP representatives sought further elaboration / discussion on:

- Development height will be considered in the context of local and national planning policy.
- Applicant to submit a rationale for proposed height and to consider potential Material Contravention regarding same.
- Applicant is advised to justify the proposed residential density in the context of local and national planning policy.
- Applicant to consider a wider analysis of housing mix in the surrounding area, as per DCC comment.

6.6.4. In relation to the design and layout of development including the public realm and interaction with the adjacent Greenway and Belmayne Main Street, provision of public open space, play area and communal facilities, also potential impacts on residential amenities, ABP representatives sought further elaboration / discussion on:

- Proposed layout to indicate potential interaction with the Key District Centre.
- Applicant to justify proposed quantum and quality of communal open space.
- Applicant to outline the extent of the ventilation for the undercroft car park.
- Applicant to provide details of landscaping and SUDs measures.
- Applicant to consider interaction with the public realm at street level with regard to DCC comments.
- Applicant to address potential impacts on existing residential amenities.
- Applicant to provide further analysis of % of dual aspect units in the context of national planning policy.
- Provide full sunlight and daylight analysis.
- Matters raised by DCC Parks, Biodiversity and Landscape Services in report dated 7th October 2020.

6.6.5. In relation to traffic and transportation issues, ABP representatives sought further elaboration / discussion on:

- Interaction with Main Street Part VIII including Bus Connects route and the pedestrian/cycle route to the west of the site.
- Matters raised by DCC Transportation Planning Division in report dated 5th October 2020.

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

- Proposed external finishes.
- Applicant to submit a Building Lifecycle Report.

6.6.7. 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-308172-20' which is on file. I have fully considered the responses and comments of the prospective applicant and planning authority in preparing the Recommended Opinion hereunder.

7.0 Conclusion and Recommendation

- 7.1. Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 7.2. I have examined all of the information and submissions before me including the documentation submitted by the prospective applicant, the submissions of the planning authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the section 28 Ministerial Guidelines, and local policy, via the statutory development plan for the area.
- 7.3. Having regard to all of the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act constitutes a reasonable basis for an application under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 7.4. I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision making process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

8.0 Recommended Opinion

- 8.1. An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.
- 8.2. Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, and submissions received from statutory consultees referred to under Section 6(10) of the Act, An Bord Pleanála is of the opinion that the documentation submitted would constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.
- 8.3. Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:
1. Housing Quality Assessment with regard to the standards set out in the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities.
 2. Building Lifecycle Report.
 3. A site layout plan showing which, if any, areas are to be taken in charge by the planning authority.
 4. A detailed landscaping plan for the site which clearly sets out proposals for hard and soft landscaping including street furniture, where proposed.
 5. 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.

6. Revised roads and car park layout, if necessary, to address matters raised in the report of Dublin City Council Transportation Planning Division dated 5th October 2020.
 7. Traffic and Transport Impact Analysis, to consider cumulative impacts of permitted development in the area.
 8. Rationale for the proposed car parking provision with regard to Dublin City Development Plan 2016-2022 Table 16.1 car parking standards and the performance related approach set out in the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2020) in relation to infill sites in urban areas, to include a car parking management strategy, details of the allocation of car parking spaces to the proposed land uses and specific provision for the proposed car club spaces.
 9. Rationale for proposed childcare provision (or lack of same) with regard to, inter alia, the 'Childcare Facilities Guidelines for Planning Authorities', circular letter PL 3/2016, and the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018), to provide details of existing childcare facilities in the area and demand for childcare provision within the proposed scheme. The applicant is advised to consult with the relevant Childcare Committee in relation to this matter prior to the submission of any application.
 10. Ecological Impact Statement.
 11. AA screening report or Natura Impact Statement.
 12. 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.
- 8.4. Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the

following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority
4. Dublin City Childcare Committee

PLEASE NOTE:

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

Sarah Moran

Senior Planning Inspector

8th February 2021