



An  
Bord  
Pleanála

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

### **Inspector's Report on Recommended Opinion ABP-308744-20**

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#### **Strategic Housing Development**

Demolition of existing structures on site, construction of 1635 no. apartments, childcare facility and associated site works.

#### **Location**

Lands at Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9.

#### **Planning Authority**

Dublin City Council North

#### **Prospective Applicant**

Hines Real Estate Ireland Ltd.

#### **Date of Consultation Meeting**

18<sup>th</sup> of January 2021.

#### **Date of Site Inspection**

18<sup>th</sup> of December 2020.

**Inspector**

Karen Hamilton

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## 1.0 Introduction

Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the planning authority, 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 1.7km to the north of Dublin City Centre and comprises of the Holy Cross College and associated lands at Clonliffe Road, Drumcondra, Dublin 3. The site is accessed from Clonliffe Road along the south. The site is bound to the west by Druncomdra Road Lower which provides access to the Mater Dei College and the Archbishop's House.
- 2.2. There are a number of protected structures on the site including the Holy Cross Church, Seminary Building and South Link Building. These protected structures are to be converted and/or extended into the overall scheme. The Red House, protected structure, is located along the boundary of the site, but not included within the overall scheme.
- 2.3. Two GAA pitches are located along the north of the site, adjoining the Tolka river. These pitches are included within the masterplan area, but not the application site. The Belvedere Rugby pitches are located to the north east, outside both the master plan lands and the application site.
- 2.4. The site is bound along the south and south east by existing residential development. An apartment building, Corn Mill, is located to the east. A row of two storey dwellings are located along the south

### 3.0 Proposed Strategic Housing Development

3.1. The proposed development comprises of the following:

A total of 1,635 no. residential units with 1,308 for Built To Rent (BTR), provided as follows:

- 562 no. studio (34%)
- 605 no. 1 bed units (37%)
- 426 no. 2 bed units (26%)
- 43 no. 3 bed units (3%)

3.2. Access proposed by vehicles, cyclists and pedestrians from a widened entrance on Clonliffe Road, at the junction with Jones’s Road and through the opening up of an unused access point on Drumcondra Road Lower at the junction with Hollybank Rd.

3.3. An additional cyclist and pedestrian access are proposed through an existing access point on Holy Cross Avenue. Access from the Clonliffe Road entrance will also facilitate vehicular access to future proposed GAA pitches and clubhouse to the north of the site and to a proposed hotel on Clonliffe Road

3.4. The design of the proposal, and associated masterplanning, has been divided between four architect firms as summarised below:

- Blocks A1- A4: O’Mahony Pike
- Blocks B1, B2, B3, C1, C2 & D2: Henry J Lyons
- The Seminary Building, South Link Building, The Assembly Hall & The Church (Block E1- E4): Mc Cullough Mulvin Architects
- Block D1: O’Donnell Tuomey Architects

### 3.5. Overall Key Parameters

<b>Site Area</b>	8ha
Units	1,635 (1,308 BTR)
Blocks	12 no. apartment blocks
Density	204 units per ha

Height	4-17 storey
Residential Amenity	3,504m <sup>2</sup> 2.1m <sup>2</sup> per unit
Childcare Facility	440m <sup>2</sup>
Retail & Cafe	329m <sup>2</sup> & 260m <sup>2</sup>
Dual Aspect	49%
Car parking	495 spaces at podium or basement & 42 spaces at surface level 0.3 spaces per unit
Bicycles	2,530 cycle spaces 1.3 spaces per unit
Public Open space	21,811m <sup>2</sup> (27%)
Communal open space	13,707m <sup>2</sup>
Part V	161 units in Block A2 & A3

- 3.6. A masterplan has been submitted exclusively **for District A**, to the north of the site. This district includes Blocks A1- A2, a new vehicular access off Drumcondra Road, the Archbishop's House and the neighbourhood square.

#### **Key parameters for District A**

<b>District A</b>	
Units	581
Blocks	A1 (309), A2 (73 units), A3 (88units), A4 (111units)
Density	251.5units per ha
Tenant Amenities	795m <sup>2</sup>
Childcare Facility	440m <sup>2</sup>
Retail	340m <sup>2</sup>

Dual Aspect	44%
Car parking	250 spaces (basement 145, podium 92, surface 13)
Height	4-8 with landmark 13 storey
Public Open space	6, 670m <sup>2</sup> (29%) along front of the site adjoining the road.
Communal open space	3,089m <sup>2</sup> (courtyard, plaza garden, roof terrace)

3.7. **District B / C & D** is located to the south, access from Clonliffe Road and includes 799 units as summarised below:

- B1 (92), B2 (137), B3 (80), C1 (146), C2 (95), D1(151) D2 (249)
- Height of up to 17 storeys for a landmark D1

3.8. The Seminary Building and South Link **Building (E1 & E2)** are both Protected Structures. The proposal includes the demolition of two more recent buildings, namely the Library Wing and the New Link Building. The Seminary building and the South Link Building are to be refurbished and extended to the rear (4-5 storey building) to accommodate 104 units.

## 4.0 Planning History

### **ABP 308193-20 (Reg Ref 2935/20)**

Permission granted by DCC for a hotel development on the carpark into the site along Clonliffe Road (part 2 -part 7 storey). An appeal has recently been submitted to ABP. This pre application proposal includes the access granted for the hotel along the Clonliffe Road.

## 5.0 Relevant Planning Policy

### 5.1. Section 28 Ministerial Guidelines

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated 'Urban Design Manual')

- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities
- Design Manual for Urban Roads and Streets (DMURS)
- Urban Development and Building Heights – Guidelines for Planning Authorities
- Architectural Heritage Guidelines for Planning Authorities. Development Guidelines for Protected Structures and Areas of Architectural Conservation.

## 5.2. Dublin City Development Plan 2016-2022

The site is located on lands zoned as Z12: Institutional Short Term, where it is an objective:

*“To ensure existing environmental amenities are protected in the predominantly residential future use of these lands.”*

- Where lands zoned Z12 are to be developed, a minimum of 20% of the site, incorporating landscape features and the essential open character of the site, will be required to be retained as accessible public open space.
- Dublin City Council will require the preparation and submission of a masterplan setting out a clear vision for the future for the development of the entire land holding.
- The masterplan will need to identify the strategy for the provision of the 20% public open space
- Development at the perimeter of the site adjacent to existing residential development shall have regard to the prevailing height of existing residential development and to standards in Chapter 16, Section 16.10 - Standards for residential accommodation in relation to aspect, natural lighting, sunlight, layout and private open space.
- The minimum 20% public open space shall not be split up into sections.

### Height

- Chapter 16 deals with Development Standards: Design, Layout, Mix of Uses and Sustainable Design.



- Section 16.7.2 deals with Height Limits and Areas for Low-rise, Mid-Rise and Taller Development.
- Inner city up to 24m residential.

Section 16.10 deals with Standards for Residential Accommodation.

#### Housing Mix

- Policy SN1: Promote Good Urban Neighbourhoods
- Policy QH6: Support a variety of housing types and tenures

#### Protected Structure

- CHC1 & CHC2: Seek to protect and preserve the special interest of the built heritage and protected structures.

## 6.0 Section 247 Consultation(s) with Planning Authority

6.1. The PA has submitted a record of several S. 247 meetings from the following dates:

- 16<sup>th</sup> of June 2020
- 09<sup>th</sup> of July 2020
- 14<sup>th</sup> of July 2020
- 22<sup>nd</sup> of July 2020
- 04<sup>th</sup> of August 2020
- 18<sup>th</sup> of August 2020
- 31<sup>st</sup> of August 2020
- 01<sup>st</sup> of September 2020
- 07<sup>th</sup> of October 2020
- 13<sup>th</sup> of October 2020
- 22<sup>nd</sup> of October 2020

The issues raised throughout these meetings are summarised below:

- More details relating to the sections, context with the surrounding areas.

- Issues relating to the housing mix and while the allowance for BTR is noted, the role of the community as a hub is highlighted.
- Dual aspect- needs to present the greenfield nature of the site.
- Render as a material is not supported.
- Functioning of the landscaping places etc is required.
- Community Audit and school capacity is required.
- Conservation have raised issues.
- Marker building – 17 storeys in height is a high quality.
- The success of the scheme and height will be dependent on a high-quality design.
- Panoramic views required.
- Uses should be teased out to support the development
- The links throughout the site, streets, impact of tree removal, uniformity of paving.
- The impact on Red House needs to be assessed.

## **7.0 Prospective Applicant's Case**

### **7.1. Statement of Consistency**

The applicant's Statement of Consistency includes reference to national, regional and local documentation and concludes that aside from the height the overall proposal is in compliance with planning policy.

### **7.2. Statement of Material Contravention**

The heights of the following Blocks are above the max heights (24m) permitted in the development plan:

- A1 (26.1m)
- A3 (25.6m)
- A4 (43.47m)

- B2 (25.8m)
- C1 (25.63m)
- C2 (22.45m)
- D1 (62.06m)
- D2 (25.63m)

The applicant submits that the proposal complies with SPPR3 of Urban Development and Building Height Guidelines.

### 7.3. **Master planning**

The scheme includes the input from several architects and a range of masterplans are included in the documentation as summarised below:

- Henry J Lyons (Blocks B1, B2, B3, C1, C2 & D2) - Architectural Design Statement and Masterplan Development Document.
- O' Donnell Tuomey Architects (Block D1)- Conliffe Lands Masterplan Design Statement.
- O Mahoney Pike (Block A1- A4) – Architectural Design Statement District A.
- Mc Cullough Mulvin Architects (Blocks E1-E4) - Conliffe Road Masterplan for the works to the protected structures, The Seminary Building, South Link Building, The Assembly Hall & The Church.

## 8.0 **Planning Authority Submission**

8.1. 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 their opinion in relation to the proposal on the 18<sup>th</sup> of December 2020.

8.2. The PA opinion notes the S. 247 meetings in relation to the proposed SHD development, the planning history on the site and surrounding area, and the policy background.

### 8.3. **Planning Assessment**

Statement of Consistency

- Does not comply with the Childcare guidelines, the applicant has provided 90 spaces although it has been calculated that 125 no. child spaces are required.
- The proposal does not comply with Policy SN1 as it does not indicate the level of detail necessary to consider the impact on the existing community and the ability to absorb the proposal.
- The proposal does not comply with the requirements of Chpt 15- Sunlight and daylight analysis.

### Zoning

- A minimum of 20% of open space shall be provided as a whole unless it incorporates significant landscape features.
- At least 10% social and affordable housing will apply to lands within the Z12 zoning objective.

### Height

- The EPA Environmental Sensitivity Mapping online tool can be useful in assessing the impact on increased densities and heights on the surrounding area.
- In relation to the assessment criteria set out in 3.2 of the building height guidelines, the height and density comply with the national guidelines, the set back from the protected structures is appropriate and the views and height of Block A4 (13) & D1 (17) are acceptable given the innovative and high quality contemporary design.
- The proposed render on the upper floors of Block C4, C2 & C3 should be reconsidered.
- There are serious concerns with the design, scale and massing of the U-shaped block A1 and D1. The single elevational treatment, bulk and massing would provide for a monotonous design and would fail to create a sense of place for future residents

### Mix

- There are serious concerns with the residential mix proposed.

- There are excessive number of one- and two-bedroom units, albeit there are a few 3-bedroom dwellings (only 3%).
- A more robust community approach would include a greater number of 3 bedrooms.

#### Dual Aspect & Stair Core

- 49% dual aspect are provided and the 50% should be met.
- The north facing one bed or studio units in Block A1 and Block A4 could be changed to 2 bedroom or corner units.
- Concerns over the number of apartments accessed from one stair core.

#### Sunlight & Daylight

- Average Daylight Factors (ADF) of the 412 rooms tested 212 of the bedrooms are over BRE Recommendations, 179 living rooms are over BRE Recommendations and 21 rooms are below BRE Recommendations. Given the site, the minimum should be achieved and the rooms below the recommendations will have a negative impact on the amenity of the future occupants.

#### Communal Facilities

- Ideally all blocks should have suitably scaled and designed tenant rooms and internal amenity space.

#### Childcare Facilities and Schools

- The childcare provision is seriously deficient and does not meet the childcare provisions in Appendix 13 of the development plan.
- An analysis of the capacity of the available childcare spaces in the vicinity of the site has not been provided.
- The development plan requires the submission of a social audit.
- An implementation and phasing plan should be submitted and accompanied with a Social Audit and a map identifying community/social facilities within 500m walking distance of the site.

## 8.4. Interdepartmental Reports

### Conservation Officer:

- The demolition of the existing buildings “new” wing on the north side and the “Library” Wing is significant. Although they are not protected it does not mean they have no significance. The applicant needs to demonstrate why the reuse is not sustainable.
- Connectivity to the Archbishops House.
- Concern over the impact on Red House (not included in the site).
- Clarity required in relation to works to the Seminary Building. There is concern in relation to the amount of the rear elevation of the PS which is subsumed by the new building. Greater clarity on the internal elevations and works to the new rear extension.
- It is unclear if the altar and tabernacle of the Holy Cross Church will be removed. There are concerns in relation to the potential impacts of the proposed new sweep/ curved wall to the rear of the church for the vehicular turning circle.
- Some of the Ambulatory mosaic panels should be left on display (not concealed by hardwood panel).
- The works to the former assembly hall are acceptable in principle.
- The height scale and massing of the 17-storey building is excessive and will dominate the PS and the surrounding area.
- The changes to the landscaping etc will be significant and there should be clarity on the removal of the mature trees at the Drumcondra Gate.

Waste Regulations: No objection subject to conditions.

Housing Department: The applicant needs to engage with the Housing Department in relation to Part V.

Environmental Health Officer: No objection subject to conditions.

Archaeology Section: No objection subject to conditions.

Parks Department: No objection subject to confirmation of the following:

- Confirmation of the trees to be retained or removed.
- Plans to indicate historic tree planting etc.
- Inclusion of public art scheme is important.
- Clear definitions of public and communal open space.
- Tree planting to represent key species.
- Additional biodiversity information.

Drainage Section: Further Clarification required on the following:

#### Masterplan

- A strategic Flood Risk Assessment of the masterplan will be required.
- No development should be in the Flood Zone B of the masterplanned lands.
- The impact of global warming on river flows shall be assessed in accommodating the possible extension of the Flood Zone B.
- The masterplan shall outline the surface water drainage systems.
- The masterplan should not lead to further deterioration of the water quality in the River Tolka in accordance with the Water Framework Directive.

#### Proposed development on the site

- The site-specific flood risk assessment should comply with the development plan.
- The appropriate treatment of surface water and a minimum of stage 2 approach shall be included.
- The main surface water infrastructure shall be implemented as part of the first phase 1 to facilitate adequate treatment of surface water prior to discharge to the River Tolka.
- The infrastructure report shall be further developed to include phasing of drainage and protections required to the river.

Transport Planning Division: No objection subject to confirmation on the following:

- The main access off the Clonliffe Road (junction with Jones Road) is on appeal with the Board at present Reg Ref 2935/20.
- The City Centre Core Bus Corridors Preferred Route Connects provides upgrades to Drumcondra Road Lower. The impact of the proposed junction should be indicated. The provision of the entrance has been agreed in principle with the NTA Bus Connects Team.
- The secondary access off Drumcondra Road will be for delivery/emergency only.
- A detailed site layout plan should be submitted to indicate the level of surface parking.
- A Mobility Management Plan should include the long-term mobility strategy and the potential for expansion for car share spaces.
- Details to be submitted clarifying the scale and quantum of cycle parking.
- Proposals for Taking in Charge should be clear.

## 9.0 Irish Water

9.1. Irish Water issued a confirmation of feasibility for the connections subject to the following:

### In respect of Water:

- The Development can be supplied from existing 600mm DI in Drumcondra Road Lower via a new 250mm ID connecting pipe with installation of a PRV controller, a bulk/DMA meter and associated telemetry system.
- Secondary connection should be provided for the development from existing 225mm HPPE water main in Drumcondra Road Lower via a new 250mm ID connecting pipe with installation of a control valve (to be closed during normal operation).

### In respect of Wastewater:

- The applicant must ensure that separate storm and foul water connection services are provided for the development.



- Storm water from the development must be discharged only into storm water network that does not discharge into an Irish Water combined/foul sewer.
- The storm water connection arrangement should be agreed with the Local Authority Drainage Division.
- Storm water from the site, currently discharging into Irish Water combined network must be removed from the network, where possible, prior the connection

## 10.0 The Consultation Meeting

10.1. A section 5 Consultation meeting took place via Microsoft Teams on the 18<sup>th</sup> of January 2021 with representatives of the prospective applicant, the Planning Authority and An Bord Pleanála in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.

10.2. 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. Development Strategy for the site to include inter alia:**

- **Height, bulk and massing;**
- **Unit Mix,**
- **Dual Aspect,**

**2. Conservation Impact Assessment,**

**3. Masterplan Strategy and adjoining lands,**

**4. Community Infrastructure Audit and Childcare Provision,**

**5. Residential Amenity of future occupants,**

**6. Residential Amenity of adjoining residents,**

**7. Drainage Matters.**

**8. Transportation Matters.**

**9. Any other matters.**

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

10.4. In relation to the **Development Strategy**, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following;

- The height, scale, bulk and mass of the overall scheme in particular the design of blocks A1 and D1, separation distances proposed and sunlight and daylight analysis.
- The quantum and quality of dual aspect units in the entire proposal, having regard to the number of single aspects north facing units and the use of projecting windows.
- The unit mix provided and the absence of sufficient 3 bed units within the overall proposal and the need to accommodate and support a growing community.
- The proposed external materials, inter alia, the use of render on the upper floors of Blocks C.

10.5. In relation to the **Conservation Impact Assessment**, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following;

- The design of Block C1 and the views and vistas of the Holy Church when approached from the east.
- The impact of the scale, bulk and mass on the protected structures.
- The impact of the extension on the Seminary Building.
- The design and layout of the gardens to the rear of the Seminary Building.
- The proposed works to the existing mature trees within the site and the impact of any works on the character of the site.
- The potential for works to have an indirect impact on protected structures in the vicinity of the site, inter alia, the entrance to the Archbishops House, traffic passing Red House.
- The internal works to Holy Church including, inter alia, inclusion of panelling, removal of altar etc.

10.6. In relation to the **Masterplan Strategy and adjoining lands**, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following;

- The use of an overarching masterplan strategy to co-ordinate the range of masterplans submitted from a number of different design firms.
- The integration of the GAA lands in the master planned area and the level of detail necessary for lands which are not within the applicant's control or ownership.
- The requirement for the masterplan to be accompanied by a strategic flood risk assessment.

10.7. In relation to the **Community Infrastructure Audit and Childcare Provision**, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following;

- The level of community and other amenities in the vicinity of the site and the need to provide a robust assessment on the level of amenities provided to serve the existing and proposed communities.
- The quantum of childcare spaces required, the need to comply with the national childcare guidelines and the submission of a detailed analysis of the capacity of the available childcare in the vicinity.

10.8. In relation to the **Residential Amenity of future occupants**, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following;

- The design and layout of blocks A1 and D2, the separation distances between opposing windows and the available sunlight to the internal courtyards.

10.9. In relation to the **Residential Amenity of adjoining residents**, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following;

- The use of BRE levels and the impact of the proposed development of the sunlight/daylight at Holy Cross Avenue and Corn Mill Road.
- The impact of the design of Block D2 and the potential for a negative impact on the residents of the Corn Mill Building by way of overbearing.

10.10. In relation to the **Drainage Matters**, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following;

- The level of detail to be contained in the site-specific flood risk assessment having regard to the inclusion of lands outside the applicant's control or ownership, namely the GAA lands along the River Tolka.
- The additional surface water details required, inter alia, impact on the River Tolka, compliance with the Water Framework Directive and the implementation of the development plan policies.

10.11. In relation to the **Transportation Matters**, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following;

- The comments submitted by the Transport Section, inter alia, the level of car parking provided and the integration of works for the Core Bus Corridor.

## 11.0 Assessment

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.

I have examined all of the information and submissions before me including the documentation submitted by prospective applicants, 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 plans for the area.

### Conclusion

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.

## 12.0 Recommended Opinion

12.1. 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.

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.

### **Residential Amenity**

Further consideration and/or justification of the documents as they relate to impact of the proposed development on the residential amenity of the existing neighbouring dwellings, having regard, *inter alia*, the location and design of Block D2 and the potential for a negative impact on the visual and residential amenity of existing occupants to the east. Additional Computer-Generated Images (CGIs) and visualisation/cross section drawings showing the proposed development in the context of the existing residential properties surrounding the site may further elaborate on the visual impact on these properties. This further consideration may require the submission of updated sunlight and daylight analysis detailing compliance with the recommended standards.

12.2. Pursuant to article 285(5)(b)(i) and (ii) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that the **following specific information** should be submitted with any application for permission:

1. The provision of an integrated masterplan strategy for the delivery of a proposed residential development including the co-ordination of all plans and

particulars, inter alia, Natura Impact Assessment, Construction Management Plan, Surface Water proposals, Flood Risk Assessment and a detailed Phasing Plan.

2. The proposed development shall be accompanied by detailed report providing a justification and rationale for the apartment mix proposed, having regard to, inter alia, National and Local planning policy, the site's context, and locational attributes. The report should outline the mix rationale in light of both SPPR 9 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) and Policy SN1 & QH6 of the Dublin City Development Plan.
3. A report detailing the quantum of dual aspect units provided having regard to, but not limited, the requirements of SPPR 4 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020). The report shall clearly identify true dual aspect units required to meet the minimum requirements and be accompanied by a detailed design rationale report. A comprehensive justification is required for any proposed north facing single aspect units.
4. A Community and Social Infrastructure Audit detailing the existing community services available in the vicinity of the site and those proposed within the proposed development. This shall be accompanied by a map to support the information in the audit.
5. A Traffic and Transport Assessment including, inter alia, a rationale for the proposed car parking provision should be prepared, to include details of car parking management, car share schemes and a mobility management plan.
6. A quantitative and qualitative assessment which provides a breakdown of the public open space. The assessment shall detail the functionality of the public space and shall disregard any areas required for circulation space such as footpaths between buildings etc.
7. Design of the proposed surface water management system including attenuation features and cross sections of all SuDS features proposed on site in the context of surface water management on the site, discharge rates equal to greenfield sites, integration of appropriate phased works, Finished Floor

Levels and subsequent integration of proposal with the Flood Risk Assessment (FRA).

8. A drawing detailing all areas proposed for Taking in charge.
9. Response to issues raised in the Appendices of Planning Authority Report, received on the 18<sup>th</sup> of December 2020, which includes the internal reports of the Transportation Planning Dept. relating to the integration of the Bus Connects and details of the cycling infrastructure, the report of the Drainage Dept. relating, inter alia, surface water design and flood risk assessments and the Conservation officer relating, inter alia, proposed works to the protected structures.
10. Proposals for the management and operation of the proposed development as a 'Build-to-Rent' scheme in accordance with Specific Planning Policy Requirement No. 7 of the Guidelines on Design Standards for New Apartments, including detailed proposals for the provision and management of support facilities, services and amenities for residents. A Building Lifecycle Report in accordance with section 6.13 of the guidelines should also be submitted and shall detail the appropriate use of external materials on all elevations. The plan shall also address the management and maintenance of public spaces and access to the development.

**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.

1. Department of Housing, Local Government and Heritage (Built Heritage and Nature Conservation)

2. The Heritage Council,
3. An Taisce-the National Trust for Ireland,
4. An Comhairle Ealaíon,
5. Fáilte Ireland
6. Transport Infrastructure Ireland.
7. Irish Water.
8. Dublin County Childcare Committee
9. Inland Fisheries Ireland

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Karen Hamilton  
Senior Planning Inspector

03<sup>rd</sup> of February 2021