



An
Bord
Pleanála

Inspector's Report

ABP-314035-22

Development	Change of use of ground floor creche to three two bedroom apartments.
Location	Cluain Larach, Knockenduff, Tramore, Co. Waterford.
Planning Authority	Waterford City and County Council
Planning Authority Reg. Ref.	22339
Applicant(s)	SE Construction (Kent) Limited
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party
Appellant(s)	SE Construction (Kent) Limited
Observer(s)	None on file
Date of Site Inspection	22 nd July 2023
Inspector	Sarah Moran

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1.0 Site Location and Description

- 1.1. The development site, stated area 0.12 ha, is within an existing recently constructed residential development called Cluain Lárach, located on the western side of Tramore, Co. Waterford. The site is occupied by an existing two storey apartment building with associated communal open space and car parking area. The building, as permitted under reg. ref. 18/544 (see planning history below) contains a vacant creche unit on the ground floor and three no. two bed apartments at first floor level.

2.0 Proposed Development

- 2.1. Permission is sought for a change of use of ground floor creche accommodation (as conditioned under condition no. 3 of reg. ref. 18/544) of building permitted under Reg. Ref. 21/166 from creche to three no. two bed apartments with amenity space to the rear at ground floor level, along with related changes to elevations and connection to site services. The ground floor layout of the proposed apartments mirrors that of the permitted layout at first floor level.

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. Waterford City & County Council (WCCC) issued a notification of a decision to refuse permission on 14th June 2022, for the following stated reasons:

1. Having regard to the planning history of the site and the overall development of the area, the provisions of the Childcare Facilities: Guidelines for Planning Authorities issued by the Department of the Environment and Local Government in June, 2001 which constitute Ministerial Guidelines under Section 28 of the Planning and Development Act, 2000 as amended and Policy CS 9 of the Waterford County Development Plan 2011-2017 (as extended and varied), would set an undesirable precedent for similar type developments and would, therefore, be contrary to the proper planning and development of the area.
2. It is considered that the proposed change of use would materially contravene condition no. 3 of planning permission ref. 18/544 which relates to the provision

of a creche to serve the overall development to which this site forms part and it is therefore considered that the proposed development would be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

- Executive Planner report, 1st June 2022, recommends refusal for two no. reasons relating to (1) development contrary to development plan policy CS 9 and the Childcare Guidelines and (2) proposed change of use would materially contravene condition no. 3 of 18/544, which relates to the provision of a creche to serve the overall development.
- AA Screening Assessment, undated, concludes that no AA issues arise.

3.2.2. Other Technical Reports

None on file.

3.3. Prescribed Bodies

3.3.1. None on file.

3.4. Third Party Observations

3.4.1. Third party submission by Pierce Flanagan, which objects to the development on the following grounds:

- The permission granted under 18/544 and other permissions included a boundary wall along the western site boundary adjacent to the observer's land. The wall is short by 4-5 feet (1.2-1.5m) on the foundation and not completed to the original boundary. This is allowing access to the observer's land from the Cluain Lárach estate, with resultant fire and property damage. The drainpipe along the boundary is not connected and the filling along the boundary has not been completed.

- The failure to complete the boundary contravenes condition no. 19 of reg. ref. 18/544. No further planning applications or changes should be permitted until this matter has been addressed.
- Concerns about the effect of drainage at the boundary on the observer's property.

3.4.2. There are several other submissions on file from local residents, which generally object to the development on the following grounds:

- Construction of a two storey standalone apartment block at this location would be out of character with the appearance of the estate and will have an adverse visual impact.
- The developer promised a creche at this location and there are many young families living in the estate. The creche is a vital amenity for the local area. There is high demand for childcare facilities in the area, with waiting lists at existing facilities, and insufficient evidence of available childcare capacity in the area to warrant the proposed change of use, with regard to the Childcare Guidelines.
- Buyers of houses in the estate were misinformed about this part of the development and a much smaller building was indicated at the subject site.
- The applicant's submission on current childcare provision in the area has several deficiencies:
 - Lacking documentary evidence or data to prove childcare capacity now or in the future.
 - Gathered during a time period when the estate was not finished or fully occupied.
 - Not independently sourced or verifiable.
 - Failing to project for future growth of childcare needs as a result of the development.
- Concerns about overdevelopment of this area of the site. The communal space and parking area for the apartments will use up existing green space.
- Development would result in overlooking of adjacent residential properties.

- Concerns about existing anti-social behaviour within the estate.
- Development will lead to additional car parking and overspill parking, which will add to existing congestion.
- Discrepancies in the Site Notice, which was not displayed for the full appropriate time.

3.4.3. There is also a submission on file from Sunny Days Montessori School, located within 1km of the development site, which is in support of the proposed change of use. It states that that childcare facility can absorb childcare demand generated by the Cluain Lárach development, also that it is more prudent to expand an existing facility rather than to construct a new facility.

4.0 Planning History

4.1. Reg. Ref. 10/439 and Reg. Ref. 16/390 Overall Cluain Lárach Development

4.1.1. Reg. ref. 10/439 is the original permission for the Cluain Lárach development. Permission was granted on 4th July 2011 for 98 no. two, three and four bed two-storey houses, consisting of detached and semi-detached units, together with all associated site development works and all associated services installation. Permission was granted under reg. ref. 16/390 for extension of duration of permission ref. 10/439 until 3rd August 2021.

4.2. Reg. Ref. 16/40 Cluain Lárach Phase 1

4.2.1. Permission granted on 21st April 2016 for alterations to Phase 1 of the development permitted under reg. ref. 10/439 comprising a reduction in the number of dwellings from 23 to 20 and includes three and four bed two storey, semi-detached and detached units. This relates to an area at the southern end of the overall Cluain Lárach development, away from the current development site.

4.3. Reg. Ref. 16/538 and 17/18 Cluain Lárach Phase 2

4.3.1. Reg. Ref. 16/538 related to Phase 2 of Cluain Lárach, an area to the south of the current development site. Permission sought for alterations to Road 11 as permitted under ref. no. 10/439, comprising a reduction in the number of dwellings from 17 to 14 and including for three and four bed, two storey, semi-detached and detached

units. This application was withdrawn. Permission was subsequently granted on 9th March 2017 for alterations to Road 11 comprising a reduction in the number of dwellings from 17 to 14 and including for three and four bed, two storey, semi-detached and detached units under reg. ref. 17/18.

4.4. Reg. Ref. 16/675 Cluain Lárach Phase 3

- 4.4.1. Relating to Phase 3 of Cluain Lárach, an area to the southwest of the current development site. Permission granted on 30th March 2017 for modifications to the layout, and to associated site services, for 44 no. houses nos. 113 to 119 and 124 to 149, with houses nos. 120 to 123 omitted due to their location relative to the residential zoned parcel of these lands as is included in the current development plan. The layout includes three and four bed, two storey, semi-detached and detached houses.

4.5. Reg. Ref. 17/693 Cluain Lárach Phase 4

- 4.5.1. Relating to Phase 4 of Cluain Lárach at the northern end of the overall development, including the subject site. Permission sought to build 73 no. houses (nos. 35 to 105 and nos. 120 and 121) consisting of three and four bed, two storey, semi-detached and detached houses, two bed two storey, semi-detached and terraced houses. Permission also sought for alterations to planning ref. 16/675 to build house no. 127, a two storey four bed detached house (one house in lieu of the previously omitted houses nos. 122 and 123), relocation of houses nos. 128 and 129 and a modification to the layout of Road 7, 7a and 7b, together with all associated site development works and all associated services installation, built and occupied under ref. no. 10/439 (extended under ref. No. 16/390). Permission was refused on 8th March 2018 for the following stated reason:

Having regard to the location of the proposed development within and adjoining lands identified as being of high and moderate risk to flooding as outlined in the OPW CFRAM programme, and the submitted Flood Risk Assessment, it cannot be concluded that the Justification Test has been passed, as required by The Planning System and Flood Risk Management, Guidelines for Planning Authorities issued by the Department of the Environment, Heritage and Local Government in November, 2009. It is therefore considered that the proposed development would exacerbate the risk of flooding within the site and / or increase the risk and consequences of

flooding elsewhere. The proposed development would therefore be contrary to Ministerial Guidance and compromise the objectives of the Development Plan and would be prejudicial to public health and safety, contrary to the proper planning and sustainable development of the area.

4.6. Reg. Ref. 18/391 Retention Permission Cluain Lárach Roads 7 and 9 and Phase 4

4.6.1. Relating to Roads 7 and 9 on the western side of the overall Cluain Lárach development and not including the current development site. Retention permission sought for unauthorised works carried out in the construction of houses nos. 90, 91, 104, 105, 120, 121, 127, 128, 129 and of houses no. 127, 128 and 129 (as permitted under reg. ref. 16/675), modification through Road 7, 7a and 7b (also permitted under reg. ref. 16/675). Permission also sought to complete houses nos. 90, 91, 104, 105, 120, 121, 127, 128, 129 and to build and complete 12 no. houses (nos. 92 to 103 inclusive), through Road 9. All of the above consisting of three and four bed, two storey, semi-detached and detached houses and two bed two storey, terraced houses, together with all associated site development works, including all associated site services, as Phases 1, 2 and 3 of Cluain Lárach, with the application to form Phase 4 of the development. Retention permission was granted on 26th July 2018 subject to 21 no. conditions, none of which involved any significant changes to the development.

4.7. Reg. Ref. 18/544 Cluain Lárach Phase 5

4.7.1. Relating to lands at the northern end of the overall Cluain Lárach development, including the current development site. Permission sought under reg. ref.18/544 to build 59 no. houses consisting of two, three and four bed, two storey semi-detached units as a follow on from Phase 1 (20 no. houses built and occupied) and Phase 4 (19 no. houses permissioned under Ref no. 18/391), together with all associated external site development works and an extension from and connection to the services of that already permitted and built in Phases 1 to 4 of Cluain Lárach.

4.7.2. The current development site is indicated as 'proposed location for creche as may be required' on the original site layout of 18/544 as submitted to the planning authority on 9th August 2018. WCCC sought further information on 20th October 2018 for various particulars, including item no. 3, which required the applicant to submit

proposals for a childcare facility to serve the overall development, or to submit documentary evidence to demonstrate in detail that there is sufficient childcare provision in place in the overall area to serve the level of demand generated by the overall development, noting that the planning authority considered the provision of an onsite childcare facility to be a necessary requirement with regard to the section 28 Childcare Guidelines, unless a strong justification (demonstrated with childcare facility statistics in the area) to omit same can be established. The applicant's response to the further information request included a revised site layout with the footprint of a creche indicated at the current development site. The applicant submitted that a detailed plan for the creche could be established and finalised when an approved childcare operator has been confirmed.

- 4.7.3. WCCC granted permission on 30th April 2019 subject to 23 no. conditions. Condition no. 3 of 18/544 stated:

Prior to commencement of development, the applicant shall enter into a Section 47 agreement with the Planning Authority in connection with the provision and timing of a creche in the area identified for such a facility on the site layout plan drawing submitted with the further information response dated 25th January 2019 (drawing number 1774/851) including a timeframe for submission of a planning application for this facility.

Reason: To enable adequate community facilities to be provided and to satisfy Government Policy for the provision of childcare facilities.

The remaining conditions imposed did not involve any significant changes to the development.

4.8. **Reg. Ref. 21/166 Development Site**

- 4.8.1. Permission granted on 8th July 2021 for a detached, two storey building at the current development site, containing a childcare facility on the ground floor (in compliance with condition no. 3 of 18/544) and three no. self-contained two bed apartments at first floor level. The final site layout submitted to WCCC as further information on 4th June 2021 indicated a parking area and bin store to the rear of the building and a creche play area to the eastern side.

5.0 Policy Context

5.1. National Planning Policy

5.1.1. The following relevant national planning policies, including section 28 guidelines, are noted:

- Project Ireland 2040 National Planning Framework
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated Urban Design Manual) (2009)
- Design Standards for New Apartments Guidelines for Planning Authorities (2020 and as updated December 2022)
- Design Manual for Urban Roads and Streets (DMURS) (2013)
- The Planning System and Flood Risk Management (including the associated Technical Appendices) (2009)
- Childcare Facilities Guidelines for Planning Authorities (2001)

5.2. Waterford City and County Development Plan

5.2.1. The Waterford County Development Plan 2011-2017 (as extended and varied) was in effect when the subject application was lodged with WCCC on 22nd April 2022. The new Waterford City and County Development Plan 2022-2028 was adopted at a meeting of Waterford City and County Council on 7th June 2022 and came into effect on 19th July 2022. Both the planning report on file, dated 1st June 2022, and the decision issued by WCCC on 14th June 2022 refer to the 2011 plan. Relevant policies of both the 2011 and 2022 development plans are set out below in order to fully inform the Board.

5.2.2. Waterford County Development Plan 2011-2017 (as extended and varied)

Chapter 9 of the development plan addresses social and community development. Section 9.4 of the plan, which relates to Childcare, Youth and Children's Needs, states that a survey by the Waterford County Childcare Committee identified a widespread shortage of childcare places to cater for the 1-2 year, 5-6 year and 6-12 year age groups in the County. The following policy applies:

Policy CS 9

It is the policy of the Council to ensure the provision of high quality and easily accessible childcare facilities in compliance with National Childcare Regulations, National and local childcare policy and local government guidelines for childcare – Childcare Facilities Guidelines for Planning Authorities 2001 (DoEHLG) or any amendments thereto.

Development plan Chapter 10 sets out development management standards, including the following, which are noted in particular in relation to the proposed development:

- 10.3 Standards for New Development
- Table 10.4: Minimum Standards for Housing Estate Developments in Urban Areas
- Table 10. 5 :Minimum Standards for Apartment Developments
- Table 10.6 Minimum Private Amenity Space Requirements
- 10.16 Childcare Facilities
- Table 10.9 Car Parking Requirements

5.2.3. Waterford City and County Development Plan 2022-2028

The new City and County Development Plan includes zoning objectives for Tramore, which supersede the Tramore LAP (see below). The development site and the Cluain Lárach development have the zoning objective RS – Existing Residential, with the stated objective:

Provide for residential development and protect and improve residential amenity.

The following development plan policy is noted in particular in relation to the proposed development:

H 20 Protection of Existing Residential Amenities

Where new development is proposed, particularly on smaller suburban infill sites (< 1 ha in area) we will ensure that the residential amenity of adjacent residential properties in terms of privacy and the availability of daylight and sunlight is not adversely affected. We will support lower density type development at these locations. We will require that new development in more established residential

areas respect and retain, where possible, existing unique features which add to the residential amenity and character of the area, such features include front walls, gates, piers, railings, and stone/brick/render work.

Development plan section 7.19 refers to the Childcare Guidelines. The following policy objective applies:

SC 17 Support the provision of childcare facilities and new and refurbished schools on sites located within or close to existing/proposed neighbourhood/urban areas and on existing/proposed public transport corridors, which meet the diverse needs of local populations.

The development management standards set out in Volume Two of the plan are also noted.

5.3. Tramore Local Area Plan 2014-2020

- 5.3.1. The development site and the Cluain Lárach development are located on lands zoned 'New Residential' under the Tramore LAP, with the following stated objective:

To protect the amenity of existing residential development and to provide for new residential development at medium density.

- 5.3.2. Section 7.9 of the LAP addresses childcare facilities and provides analysis of childcare facilities available in Tramore when the plan was prepared. It states:

The Planning Authority will direct future childcare facilities into the neighbourhood centres rather than their provision on a piece meal basis in individual housing estates.

5.4. Natural Heritage Designations

- 5.4.1. The site is 2.13 km west of Tramore Dunes and Backstrand SAC (site code 000671) and 2.26 km west of the Tramore Backstrand SPA (site code 004027).

5.5. EIA Screening

- 5.5.1. Having regard to the nature and scale of the proposed development, comprising a change of use of part of an already constructed building within a permitted and developed housing estate, there is no real likelihood of significant effects on the

environment arising from the proposed development. The need for environment impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

6.0 The Appeal

6.1. Grounds of First Party Appeal

6.1.1. The main points made in the grounds of appeal may be summarised as follows:

- The provision of a creche was considered at an earlier stage of the overall Cluain Lárach development. However, a creche was omitted from the final layout as it was considered at the time that the provision of a creche at the development would be unviable due to oversupply of childcare facilities in Tramore town and environs.
- The further information submitted under reg. ref. 18/544 included a report on the number and capacity of existing childcare facilities in Tramore, noting that the site layout of that permission included an outline of the location of the existing building at the subject site and noting also condition no. 3 of 18/544. Some correspondence relating to this is submitted with the grounds of appeal.
- Permission was granted for the subject creche facility under reg. ref. 21/166, also the apartments at first floor level.
- The Cluain Lárach development is now built and all houses are occupied. Work is now in progress on processing a taking in charge application for the public works areas of the development. The applicant has marketed the permitted creche facility at the subject site for two years (at the time of writing) and the facility remains unoccupied. The following points are noted in relation to this matter:
 - The location of the site at the rear of a large estate eliminates the use of the facility for residents outside the estate, reducing potential clients.
 - Demand for childcare facilities may be facilitated in other existing childcare facilities in Tramore. There are c. nine no. existing facilities in total in Tramore with spaces available for all age groups.

- The application of the quantitative requirements of the Childcare Guidelines would lead to an unviable childcare facility at this location. This creates the potential for anti-social behaviour at the site due to unoccupied units and uncompleted area.
- The applicant has engaged with WCCC Housing Section. There appears to be a general acceptance that the proposed 'own door' ground floor residential units would be in accordance with the current Housing Strategy and WCCC Housing would welcome an opportunity to discuss and finalise a suitable Lease or Purchase Agreement to build and complete the self-contained apartment units as local authority housing stock. This would be preferable to an uncompleted, vacant unit at this location.

6.2. **Planning Authority Response**

6.2.1. None on file.

6.3. **Observations**

6.3.1. None on file.

6.4. **Further Responses**

6.4.1. None on file.

7.0 **Assessment**

7.1. I have read through the file documentation, the relevant provisions of the current Waterford City and County Development Plan 2022-2028 as well as the previous Waterford County Development Plan 2011-2017 (as varied and extended) and the Tramore Local Area Plan 2014-2020, which were in effect when the subject application was lodged with Waterford City and County Council (WCCC) on 22nd April 2022. I have also had regard to other relevant local/regional/national policies and guidance and have carried out a site inspection. The main issues are those raised in the planning report on file and in the grounds of appeal. I consider that the only issues that arise are in relation to the principle of the development and to

potential impacts on visual and residential amenities of the area. I note in this regard that the technical reports on file do not raise any other issues and that the change of use relates to an existing permitted and completed building that is already connected to site services, also that the site is outside of any flood zone. I therefore consider that the main issues on this appeal are as follows:

- Principle of Development
- Impacts on Residential and Visual Amenities
- Appropriate Assessment.

Each of these issues is addressed in turn below.

7.1.1. **Note:** I note the third party submission to the planning authority which raises concerns about impacts at the boundary shared with the observer's property, unsatisfactory completion of the development permitted at the subject site under reg. ref. 18/544, and non-compliance with condition no. 19 of 18/544. These matters are outside the scope of this appeal and are not considered in the following assessment.

7.2. Principle of Development

7.2.1. The proposed residential use is acceptable in principle with regard to the residential land use zonings that apply at the development site under both the current development plan and the previous LAP that was in force when the subject application was lodged.

7.2.2. Policies on the provision of childcare facilities in both the current and previous development plans refer to the section 28 Childcare Facilities Guidelines for Planning Authorities. Section 2.4 of the Childcare Guidelines recommends:

Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary for example, development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments. For new housing areas, an average of one childcare facility for each 75 dwellings would be appropriate. (See also paragraph 3.3.1 and Appendix 2 below). The threshold for provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas. Authorities could consider requiring the provision of larger units catering for up to 30/40 children in areas of

major residential development on the basis that such a large facility might be able to offer a variety of services – sessional/drop in/after-school, etc.

Appendix 2 of the Childcare Guidelines provides guidance on the application of the standard of one childcare facility per 75 dwellings, which should have regard to:

- 1. The make-up of the proposed residential area, i.e. an estimate of the mix of community the housing area seeks to accommodate. (If an assumption is made that 50% approximately of the housing area will require childcare then in a new housing area of 75 dwellings, approximately 35 will need childcare. One facility providing a minimum of 20 childcare places is therefore considered to be a reasonable starting point on this assumption. Other assumptions may lead to an increase or decrease in this requirement.)*
- 2. The results of any childcare needs analysis carried out as part of a county childcare strategy or carried out as part of a local or action area plan or as part of the development plan in consultation with county childcare committees, which will have identified areas already well-served or alternatively, gap areas where there is under provision, will also contribute to refining the base figure.*

7.2.3. The childcare facility at the subject site is the only such facility within the overall Cluain Lárach development and was required under condition no. 3 of 18/544 in order to comply with the Childcare Guidelines. I note the comments of the applicant that there is adequate existing childcare provision in Tramore to cater for childcare demand generated by the development, also the submission on file of a local childcare provider stating that they have capacity to cater for such demand. In addition, the applicant has submitted a copy of some analysis of childcare provision in Tramore, dating to 29th November 2017. These are countered by the submissions on file of local residents, which state that there is shortage of childcare places in Tramore. I also accept that the LAP refers to the development of childcare facilities at neighbourhood centres rather than their provision on a piece meal basis in individual housing estates. However, I consider that the applicant has not submitted sufficient detailed analysis of current local demography, related childcare demand or of the existing availability of childcare places in the area, e.g. in the form of an up to date Childcare Demand Assessment, in order to justify the proposed change of use

of the permitted childcare facility, in contravention of condition no. 3 of 18/544 and of the Childcare Guidelines which are current national planning policy on this matter.

7.2.4. The grounds of appeal state that the applicant has engaged with WCCC Housing Section on the basis that the proposed 'own door' ground floor residential units could be leased or purchased by the local authority. However, the applicant has not submitted any documentary evidence of same, such as correspondence from WCCC.

7.2.5. To conclude, having regard to the documentation on file and to relevant local and national planning policies, I do not consider that the applicant has adequately justified the proposed change of use from creche to three no. apartments at the ground floor of the permitted building, in contravention of condition no. 3 of 18/544. I therefore recommend refusal, as set out below.

7.3. Impacts on Residential and Visual Amenities

7.3.1. The applicant has not submitted any detailed quality assessment of the proposed residential units, however they would appear to be generally in accordance with the Apartment Guidelines. While I note the comments of local residents regarding the loss of amenity space at the development, I consider that there is ample public open space in the overall estate to compensate for any minor loss of amenity space at the subject site. In addition, the proposed residential units would generate less parking demand and traffic overall than the permitted childcare facility. I also do not consider that the proposed ground floor residential units would result in any significant additional impacts on residential or visual amenities beyond those of the permitted childcare facility at this location.

7.4. Appropriate Assessment

7.4.1. The site is 2.13 km west of Tramore Dunes and Backstrand SAC (site code 000671) and 2.26 km west of the Tramore Backstrand SPA (site code 004027). Having regard to the nature and scale of the proposed development being a change of use within a permitted and completed building in an existing housing development on serviced land, and the separation distances to the European sites from the subject site, I do not consider that the proposal would be likely to significantly impact the qualifying interests of the European Sites during either the construction or operational phases of development. As such, I consider that no Appropriate

Assessment issues arise. The AA Screening Assessment on file by WCCC (undated) is also noted in this regard. In conclusion, I do not consider that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

8.0 Recommendation

8.1. Having regard to the above assessment, I recommend refusal for the reasons and considerations stated below.

9.0 Reasons and Considerations

1.	On the basis of the information provided with the application and first party appeal, The Board is not satisfied that the proposed change of use would not contravene the section 28 Childcare Guidelines for Planning Authorities issued by the Department of the Environment and Local Government in 2001. The development is therefore contrary to the proper planning and sustainable development of the area.
2.	It is considered that the proposed change of use would materially contravene Condition no. 3 of reg. ref. 18/544, which relates to the provision of a creche to serve the overall development to which this site forms part and it is therefore considered that the proposed development would be contrary to the proper planning and sustainable development of the area.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Sarah Moran
Senior Planning Inspector

23rd July 2023