

COUNTY ARCHITECT'S REPORT

Proposed Sports Changing Rooms Pavilion at Corkagh Park (Outer Ring Road, R136), Clondalkin, Dublin 22

Part 8 Process, carried out under the Planning & Development Act 2000 (As Amended) Planning and Development Regulations 2001 - 2018

Recommendation to Council to Approve Development following display and consultation and incorporating responses to observations and consultation.

Issued June 2020

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PART-8

Nov 2019



COUNTY ARCHITECT'S REPORT – Part 8 Recommendation to Council	
Project Title:	Proposed Sports Changing Rooms Pavilion at Corkagh Park (Outer Ring Road, R136), Clondalkin, Dublin 22
County Architect:	Eddie Conroy FRIAI
Senior Architect:	Anne Lynch FRIAI
Dept:	Architectural Services Department, South Dublin County Council
A brief explanation of Part 8 Process carried out under Part 8 of the Planning and Development Regulations 2001	<p>Part 8 (Public Consultation Developments)</p> <p>Developments by a local authority are subject to a public consultation process as set out in the Planning & Development Act 2000 (as amended) Planning and Development Regulations 2001 - 2018. This procedure requires that notice of the proposed development is given in the public press and that a site notice be erected. If any submissions or observations are received, a report is presented to the members of the Council. This report contains a list of the objector's names along with a summary of the points made by them and the Local Authority' response.</p> <p>Arising from consideration of the representations, the report sets out whether or not it is proposed to proceed as originally planned or to proceed with a modified proposal.</p> <p><u>Development by a Local Authority: 'Part 8'</u></p> <p>From time to time the Local Authority may carry out development within its administrative area, such as the construction of houses, roads, swimming pools, public toilets, sports pavilion etc.</p> <p>Development carried out by a Local Authority is often referred to as a 'Part 8'.</p> <p>Public consultation is an intrinsic part of the 'Part 8' process. This is achieved by public notices, public display of the proposal, observations by members of the public, reportage on observations received and a recommendation that considers all internal and public observations. The consultation may extend to advisory consultation meetings with local community and interest groups dependant on the particular circumstances and impact of the proposal, though such meetings are not proscribed under the legislation. The primary purpose of the process is to notify the public of the proposal and incorporate any observations validly submitted into a report to inform the Council on its decision to recommend the proposal.</p> <p>Comments and observations on Proposed Developments by a Local Authority can only be received in writing between certain dates. The public notices should be referred to in this regard to ascertain the final date of receipt for observations.</p>

Part 8 of the Planning & Development Act 2000 (as amended) refers to requirements in respect of specified development by, on behalf of, or in partnership with Local Authorities. Part 8 applications are generally lodged by the proposing department within the Council. Article 80 of the Planning and Development Regulations 2001 - 2018 sets out a list of the types of development prescribed for the act.

The process is as follows:

Public Notices of the proposed development must be placed in an approved newspaper. A site notice (or notices) must be erected on the land on which the proposed development is situated – Article 81(1)(a)(b) of the Planning and Development Regulations 2001 - 2018 guides the requirements.

The application, which must be submitted on the same date as the newspaper notice, must include a cover letter/report, a copy of the newspaper notice and site notice and public display of the proposal in a designated public area accessible to the public during normal office hours – normally County Hall. Drawings can be made available to the public on request.

There is no fee payable on a Part 8 application.

The application is referred to as internal works Departments in the City Council – (Roads, Water, and Drainage).

In the case of protected structures, the application is referred to the Conservation Section, An Taisce, DEHLG and the Heritage Council.

The timeframe for third party Observations/Submissions on the Part 8 application is six weeks from the date of lodgement. This date is specified in the public notices. There is no fee charged for observations/submissions on Part 8.

The proposing Department completes a report for the attention of the Executive Manager of the Planning Department. The Executive Manager will make a recommendation to the proposing department on foot of this report.

A report will then be compiled for a meeting of the Council. Following consideration of this report by the Council, the proposed development may be recommended, unless the local authority, by resolution, decides to vary or modify the development, otherwise than as recommended in the report, or decides not to proceed with the development' – as per Section 179(4)(b) of the Planning and Development Act 2000 (as amended). For a part 8 application, the period for observations/submissions is 6 weeks.

The making of a decision on a Part 8 application is a reserved function of Council, while for a normal planning application this is an executive function.

	<p>The above is a summary of the Part 8 requirement for consultation. It is intended for guidance only. The Planning Acts set out the requirements in full.</p>
<p>Public Notice:</p>	<p>Proposed New Works</p> <p>Development of Proposed Sports Changing Rooms Pavilion at Corkagh Park (Outer Ring Road, R136), Clondalkin, Dublin 22</p> <p>The proposed site is located in Corkagh Park (Outer Ring Road, R136), Clondalkin, Dublin 22, lying North of the N7 and East of the R136 Outer Ring Road. Corkagh Park, comprising approximately 200 acres, stretches eastwards to Clondalkin Village. It is located within the Corkage Park and contains carpark, a children's play area, playing pitches, cycle track, other sports facilities, and an exercise area. The proposed development is for a single storey changing rooms pavilion. The site is located in the west of the Park on R136, off Kingswood [Exit-2] on N7.</p> <p>Planning and Development Act, 2000 (as Amended) Public Consultation Procedure under Part 8 of the Local Government Planning and Development Regulations 2001 (as Amended).</p> <p>Pursuant to the requirements of the above, notice is hereby given of the proposal to construct the following development by South Dublin County Council:</p> <p>Proposed Sports Changing Rooms Pavilion at Corkagh Park (Outer Ring Road, R136), In accordance with the requirements of the above, notice is hereby given that South Dublin County Council proposes:</p> <ul style="list-style-type: none"> • One single storey [331 SqM] changing pavilion consisting of six team changing rooms each with one toilet/shower area, two club storage areas, one official's changing area with toilet and wash facilities, and one plant room, all with individual access. • 2 No. Storage facilities for team equipment and Plant room. • Ancillary works to the landscape pavilion area • Additional necessary ancillary works in adjacent areas including foul and surface drainage • Utility room for preparation of tea • Installation of CCTV for security <p>Drawings of the proposed developments were on public display at County Hall, Tallaght, Dublin 24 and Clondalkin Civic Offices, Dublin 22, during normal working hours and on http://www.sdcc.ie/, during the period from 27th February 2020 to 27th March 2020.</p> <p>The proposed Development has undergone Appropriate Assessment Screening under the Habitats Directive (92/43/EEC) and a full examination for Environmental Impact Assessment of the proposal and the Planning Authority has concluded that there will be no real likelihood of significant effects on the environment arising from the proposed</p>

development and therefore an Environmental Impact Assessment is not required. Any person may, within 4-weeks from the date of this notice, apply to An Bord Pleanála for a screening determination as to whether the proposed development would be likely to have significant effects on the environment.

The plans and particulars can be viewed on South Dublin County Council's website – www.sdcc.ie and the Public Consultation Portal <http://consult.sdublincoco.ie>

COVID 19: The Government extended the Submissions or observations under S251A Order and increased the timelines by 56 Days (from 10-days). As such, the public consultation Submissions or observations deadline for the Part 8 process needs to be increased by 56 further days i.e., Written submissions not later than 5 pm on the 15th April 2020 increased to 15th June 2020 excluded for the statutory timelines.

<p>Submissions: Submissions or observations in relation to the proposed development, dealing with the proper planning and sustainable development of the area in which the development would be situated, may be made as follows: Or</p>	<p>Online at https://consult.sdublincoco.ie up to 5 pm on the 15th June 2020.</p>
<p>Written submissions not later than 5 pm on the 15th April 2020. Please address your submission to: Please see the COVID 19 note above</p>	<p>Senior Executive Officer Environment, Water and Climate Change Department South Dublin County Council County Hall, Tallaght, Dublin 24, D24 YNN5</p>
<p>NOTE: Please make your submission by one medium only. Only submissions received by 5 pm on the 15th April 2020 and addressed as set out above, will be considered.</p>	<p>It should be noted that the Freedom of Information Act applies to all records held by South Dublin County Council.</p>

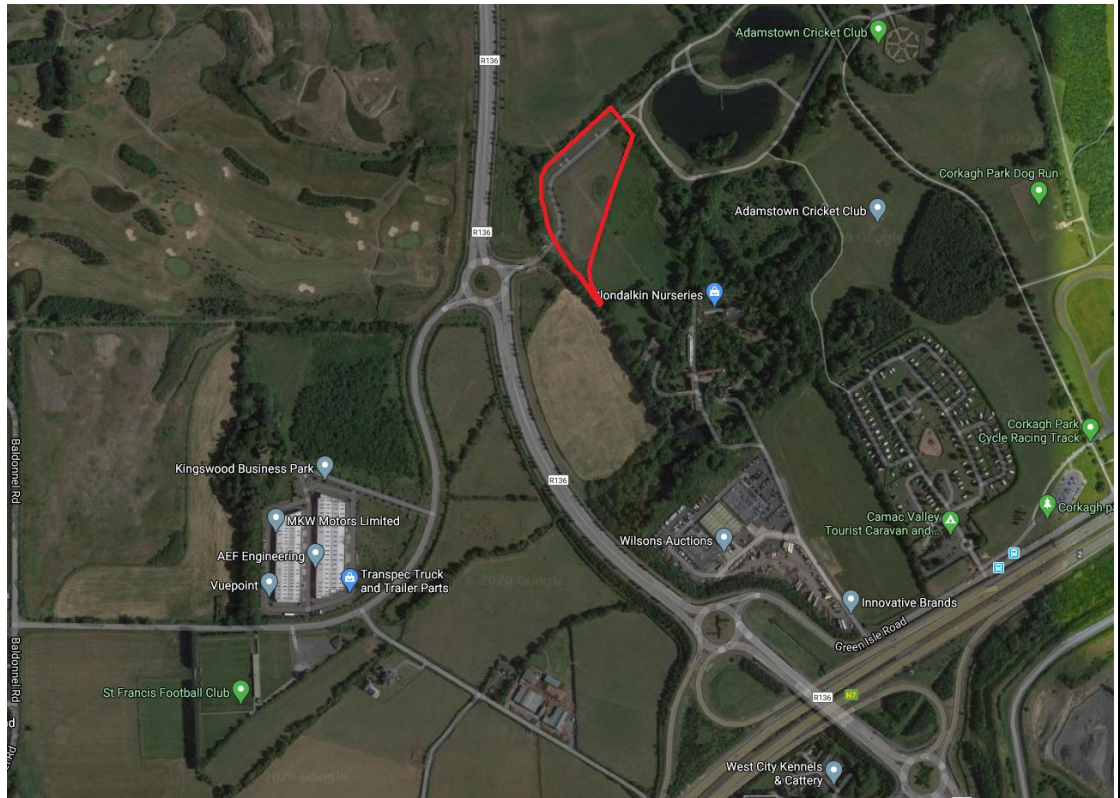
Submissions cannot be accepted in any other format or to any other postal address. Submissions and observations should state the name, address, and, where relevant, details of any organisation, community group or company etc. which you represent.

Date site notice erected: 27th February 2020

Context:

The proposed site is located in Corkagh Park (Outer Ring Road, R136), Clondalkin, Dublin 22, lying North of the N7 and East of the R136 Outer Ring Road. Corkagh Park, comprising approximately 200 acres, stretches eastwards to Clondalkin Village. It is located within the Corkage Park and contains carpark, a children's play area, playing pitches, cycle track, baseball facilities and an exercise area. The

proposed development is for a single storey changing rooms pavilion. The site is located in the west of the Park on R136, off Kingswood [Exit-2] on N7.



Location (outlined with a red line)



An aerial view of the Site (outlined with a red line)



View 1 from Roundabout on R136, the point of access to the site



View 2 from R136 heading towards Kingswood. The site entrance is to the left [Exit-1 on roundabout].



View 2 from R136 heading towards Adamstown. The site entrance is to the Right [Exit-3 on roundabout].

The site is does not have severe contours and is generally level.
All services are available.



Site Location Map and local road network (site indicated with red colour)

The site is situated in a park, approximately 2-km due north of N7. the site is used as parkland.

The proposal for Pavilion is supported by access to extensive parkland, sports facilities, and leisure facilities.

Changing Room Need in the area:

There is an established Changing Room/club storage facility need in the area. Sites for development are not readily available, and the council owns very little significant land holdings in the area. This landholding must, therefore, be utilised effectively.

Planning / Zoning for the site

Planning / Zoning

The lands are zoned – South Dublin County Council Development Plan *Zoning Objective 'OS': 'To preserve and provide for open space and recreational amenities'*

USE CLASSES RELATED TO ZONING OBJECTIVE	
Permitted in Principle	Allotments, Community Centre, Cultural Use, Open Space, Recreational Facility, Sports Club/Facility.
Open for Consideration	Agriculture, Bed & Breakfast*, Camp Site, Carpark*, Cemetery*, Childcare Facilities, Crematorium, Education, Garden Centre, Guest House*, Home Based Economic Activities*, Hotel/Hostel, Housing for Older People, Outdoor Entertainment Park, Place of Worship*, Public Services, Recycling Facility, Residential, Restaurant/Café, Shop-Local, Stadium, Traveller Accommodation.
Not Permitted	Abattoir, Advertisements and Advertising Structures, Aerodrome/ Airfield, Betting Office, Boarding Kennels, Caravan Park-Residential, Concrete/Asphalt Plant in or adjacent to a Quarry, Conference Centre, Doctor/Dentist, Embassy, Enterprise Centre, Fuel Depot, Funeral Home, Health Centre, Heavy Vehicle Park, Hospital, Industry-Extractive, Industry-General, Industry- Light, Industry-Special, Live-Work Units, Motor Sales Outlet, Nightclub, Nursing Home, Office-Based Industry, Offices less than 100 sq.m, Offices 100 sq.m -1,000 sq.m, Offices over 1,000 sq.m, Off-Licence, Petrol Station, Primary Health Care Centre, Public House, Refuse Landfill/Tip, Refuse Transfer Station, Residential Institution, Retail Warehouse, Retirement Home, Rural Industry-Food, Science and Technology Based Enterprise, Scrap Yard, Service Garage, Shop-Major Sales Outlet, Shop Neighbourhood, Social Club, Transport Depot, Veterinary Surgery, Warehousing, Wholesale Outlet, Wind Farm.

The zoning of the site coloured green on the map below supports a pavilion development and the criteria as applicable from the Development Plan supports the design proposed. The proposed development complies with the relevant Development plan policies.

The site is within the area of the statutory Clondalkin Local Area Plan.

Zoning map for Area (extract from the County Development Plan 2016 – 2022)

The development plan policies that affect the site directly - To preserve and provide for open space and recreational amenities Zoning Objective 'OS'- are the following:

GREEN INFRASTRUCTURE (G) Policy 1 Overarching
It is the policy of the Council to protect, enhance and further develop a multifunctional Green Infrastructure network by building an interconnected network of parks, open spaces, hedgerows, grasslands, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, flood management and adaptation to climate change.
G1 Objective 1: To establish a coherent, integrated and evolving Green Infrastructure network across South Dublin County with parks, open spaces, hedgerows, grasslands, protected areas, and rivers and streams forming the strategic links and to integrate the objectives of the Green Infrastructure Strategy throughout all relevant Council plans, such as Local Area Plans and other approved plans.
G1 Objective 2: To prepare and implement a South Dublin County Green Infrastructure Strategy during the lifetime of this plan that will form the basis for the identification, protection, enhancement and management of the Green Infrastructure network within the County.

This proposed modest development of the site would not affect the character of the adjoining developments and is allowable under the County Development Plan. The design seeks to reinforce the existing development. The proposals as submitted for Part 8 Public Consultation comply with the County Development Plan Objectives.

**AA & EIA
Assessment**

AA:

This stage 1 screening for AA of the proposed changing rooms pavilion shows that implementation of the project is not foreseen as likely to have any significant effects on any European site.

The project is 6.48 km from the nearest European site. The AA screening process has considered potential effects which may arise during the construction and operational phases as a result of the implementation of the project. There are no direct hydrological pathways to any European sites. Therefore, given the scale of the development and its distance from European sites, the effects arising from these works will be negligible. Through an assessment of the pathways for effects and an evaluation of the project characteristics, taking account of the processes involved and the distance of separation from European sites, it has been evaluated that significant adverse effects on the qualifying interests, special conservation interest or the conservation objectives of any designated European site are unlikely. The ecological integrity of the European sites is not foreseen to be significantly affected by the project.

Given the nature of the development, its scale, distance from European sites and absence of direct hydrological pathway to European sites and the localised and the temporary nature of the construction effects, the proposed development does not have potential to cause significant effects in-combination with effects arising from any other plans or projects.

It is concluded that the project is not foreseen to give rise to any significant adverse effects on any designated European sites, alone or in combination with other plans or projects. This evaluation is made because of the conservation objectives of the habitats or species for which these sites have been designated. Consequently, a Stage Two AA (Natura Impact Statement) is not required for the project.

EIA

Environmental Impact Assessment is not required because the proposed development is not of a class listed in Schedule 5 and is of nature and scale such that there is no real likelihood of significant effects on the environment arising.

It is concluded that, in accordance with Article 103 of the Regulations of 2001, there is no requirement for an Environmental Impact Assessment to be carried out for the proposed development. Therefore, there is no requirement for an Environmental Impact Assessment Report to be prepared.

Any person may, within 4 weeks from the date of this notice, apply to An Bord Pleanála for a screening determination as to whether the proposed development would be likely to have significant effects on the environment.

NOTE: AA & EIA report attached.

<p>Flood Risk Assessment</p>	<p>A Stage II Flood Risk Assessment has been undertaken in accordance with the FRM guidelines. The main aim of this FRA was to determine the risk of flooding to the site and the impact, the development will have on the floodplain, upstream and downstream levels, and any mitigation measures necessary. CFRAM modelling and mapping are not available for this area. According to FRM Guidelines, a justification test was not required as the proposed project is a “water compatible development”.</p> <p>The sequential approach for flood risk assessment, as outlined in the FRM guidelines, was undertaken. As the site is within Flood Zone A i.e. a flood event has a 1 in 10 chance of occurring or being exceeded in any given year, a Stage II Flood Risk Assessment was undertaken. Two site visits were carried out Thursday 6th February 2020 with an additional walkover undertaken on 12th of February 2020 (following the Storm Ciara).</p> <p>The site currently is a mixture of hardstand (road and carpark with surface water drainage) and greenfield. The proposed development has planned measures to manage the surface run-off. These include the utilisation of a sedum roof and permeable paving. As the has a high percentage of hardstand there will be a minimal increase in run-off post any development. Additionally.</p> <p>Overall, it is concluded that this proposed development is not at risk from flooding with the proposed finished floor level for the development at 76.053 mAOD which is circa 500 mm above the 1:1000-year AEP flood level of 75.56 mAOD and 900 mm above the 1:100 year AEP river flood level of 75.15 mAOD in the nearby River Camac. The Pavillion development is classified as “water compatible” as per OPW FRM Guidelines and as such the proposed sports pavilion is appropriate for lands within Flood Zone A.</p> <p>NOTE: FRA report attached</p>
<p>Project Description & Design</p>	<p>The proposed development consists of a single storey changing room pavilion.</p> <p>The key elements include:</p> <ul style="list-style-type: none"> • One single storey changing pavilion consisting of six team changing rooms each with one toilet/shower area, two club storage areas, one official's changing area with toilet and wash facilities, and one plant room, all with individual access. • Ancillary works to hard landscape to the pavilion area • Additional necessary ancillary works in adjacent areas including foul and surface drainage. <p>The project is designed to provide Changing Room/club storage facilities in the area. The design of the proposed access points, pathway and landscape would consider the existing scale and pattern of development of the pavilion in the Corkagh Park. A single-storey structure (331 Sq.M) would be constructed</p>

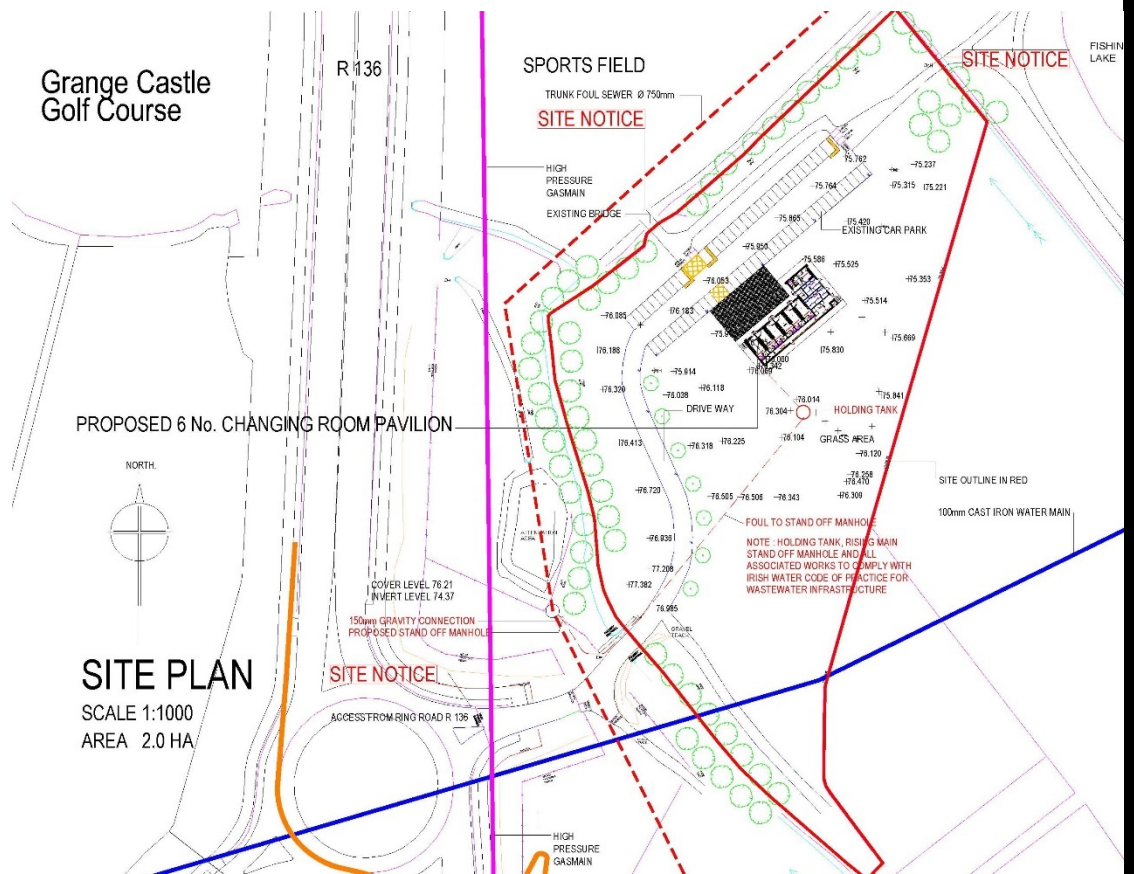
The following areas apply to the site and building, as proposed:

- Site Area: 20070 Sq.M / 4.95 Acres / 2 Hectares
- Proposed Floor Area: 331 Sq.M

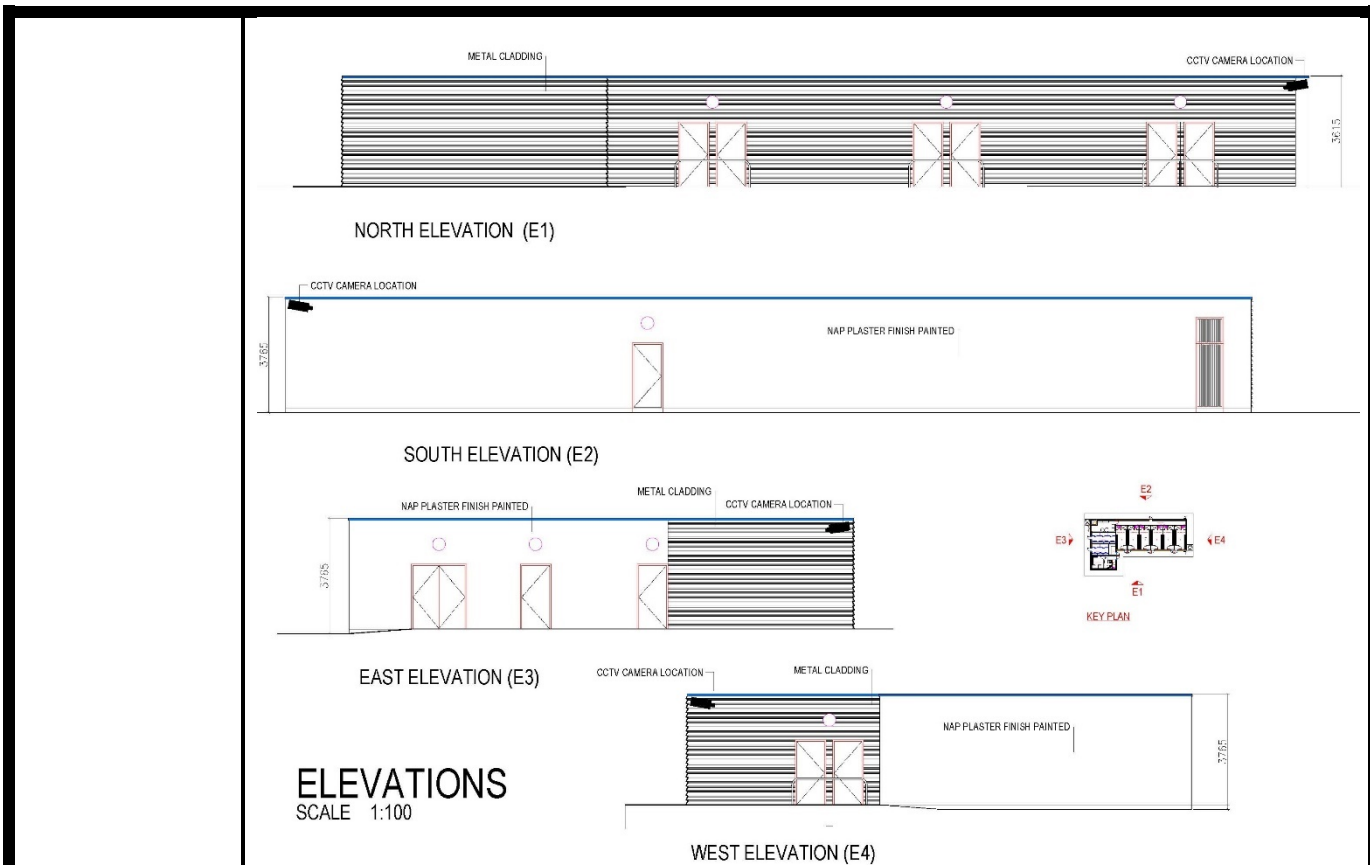
Each Changing room/club storage would have its own door / own entrance. Modified path, bin storage area and front landscaped to match those of the adjacent area. The proposed pavilion would be serviced by the existing local drainage, local water supply and utilities (electrical and telecoms).

The changing rooms will front onto the existing carpark area. The proposed site layout for the changing rooms will include provision for safety, CCTV security, maintenance and care of the new development.

Following the end of the consultation process, and the final presentation to the Council Chamber, the layout will be reviewed in the light of observations submitted during the public consultation period. The Overall Project Budget is subject to approval.



Concept sketch/ design approach/ constraint



Landscaping Restoration of the existing landscape with supplementary planting to boundaries where existing park abuts with the proposed development site. Removal of undergrowth and weed plants on site. Landscaping of all open space areas and local upgrading of boundaries.

Ancillary Works to Project: Connection to existing local services (drainage, water, electrical, telecoms)
Alteration / Upgrading of existing landscaping and open space.

Project Partners Environment, Water and Climate Change

Site / Services Constraints: All major existing services runs have been identified for the design. Local alterations to layout are likely when on-site investigations establish precise underground service locations.

Internal Comments Part-8 information was shared with all the required relevant internal departments.

Revived no Submissions or observations

Flood Report attached

Surface Water Surface water - requires to be fully scoped to ensure the capacity of the existing network. Attenuation provision and method to be agreed.

Foul drainage Foul drainage – requires to be fully scoped to ensure the capacity of the existing network. Irish Water application required.

Roads Access Roads access and capacity are within acceptable and safe limits.
For Comment

Irish Water	Application for Foul and Water services to be completed. No known diversions.
Parks	For Comment
Circulation to prescribed bodies	Environmental Protection Agency, NPWS (Department of Arts, Heritage and the Gaeltacht), National Monuments (Department of Arts, Heritage and the Gaeltacht), Inland Fisheries Ireland, Health Services Executive, Office of Public Works, National Monuments Service, National Park & Wildlife Service
Contact Details	Anne Lynch FRIAI Senior Architect
Part 8 Submissions & Commentary	All submissions will be recorded by the Public Realm Management Department and a commentary will be provided below on the main issues raised during the consultation period.

ISSUES RAISED AND CHIEF ARCHITECTS RESPONSES

S. No	Issues Raised By	Observation	Theme	Response & Recommendation
1	Inland Fisheries Ireland	Concerns on the location of the wastewater holding tank and pumping facility as proposed in lands in Flood Zone A	Wastewater	<p>A Stage II Flood Risk Assessment has been undertaken in accordance with the FRM guidelines. The main aim of this FRA was to determine the risk of flooding to the site and the impact, the development will have on the floodplain, upstream and downstream levels, and any mitigation measures necessary. CFRAM modelling and mapping are not available for this area. According to FRM Guidelines, a justification test was not required as the proposed project is a “water compatible development”.</p> <p>The sequential approach for flood risk assessment, as outlined in the FRM guidelines, was undertaken. As the site is within Flood Zone A i.e. a flood event has a 1 in 10 chance of occurring or being exceeded in any given year, a Stage II Flood Risk Assessment was undertaken. Two site visits were carried out Thursday 6th February 2020 with an additional walkover undertaken on 12th of February 2020 (following the Storm Ciara).</p> <p>The site currently is a mixture of hardstand (road and carpark with surface water drainage) and greenfield. The proposed development has planned measures to manage the surface run-off. These include the utilisation of a sedum roof and permeable paving. As the has a high percentage of hardstand there will be a minimal increase in run-off post any development. Additionally.</p> <p>Overall, it is concluded that this proposed development is not at risk from flooding with the proposed finished floor level for the development at 76.053 mAOD which is circa 500 mm above the 1:1000-year AEP flood level of 75.56 mAOD and 900 mm above the 1:100 year AEP river flood level of 75.15 mAOD in the nearby River Camac. The development is classified as “water compatible” as per OPW FRM Guidelines and as such the proposed</p>

				<p>sports pavilion is appropriate for lands within Flood Zone A.</p> <p>The proposed foul water pumping station and holding tank will be located in an area outside of any flood zone within the site. The proposed foul water pumping station and holding tank shall maintain minimum setback requirements from buildings as per Irish Water Code of Practice requirements. This will ensure that flooding will not result in a malfunction of the pumps and/or power failure, therefore will not impact on the associated watercourses and the River Camac.</p> <p>The final layout and design details of the proposed foul water pumping arrangement and holding tank shall be in accordance with Irish Water's Code of Practice for Wastewater Infrastructure and shall be agreed with South Dublin County Council's Water Services section before commencement of development.</p> <p>The ownership, operation and maintenance agreement of the pumping arrangement is yet to be agreed upon however further discussions are required between Irish Water and South Dublin County Council on how ownership, operation and maintenance of the proposed pumping station and holding tank will proceed.</p>
2	South Dublin Conservation Society	The water table is at or near the land surface at this particular location at Corkagh Park	Water table	<p>AA:This stage 1 screening for AA of the proposed changing rooms pavilion shows that implementation of the project is not foreseen as likely to have any significant effects on any European site. The project is 6.48 km from the nearest European site.</p> <p>The AA screening process has considered potential effects which may arise during the construction and operational phases as a result of the implementation of the project. There are no direct hydrological pathways to any European sites. Therefore, given the scale of the development and its distance from European sites, the effects arising from</p>

			<p>these works will be negligible. Through an assessment of the pathways for effects and an evaluation of the project characteristics, taking account of the processes involved and the distance of separation from European sites, it has been evaluated that significant adverse effects on the qualifying interests, special conservation interest or the conservation objectives of any designated European site are unlikely. The ecological integrity of the European sites is not foreseen to be significantly affected by the project.</p> <p>Given the nature of the development, its scale, distance from European sites and absence of direct hydrological pathway to European sites and the localised and the temporary nature of the construction effects, the proposed development does not have potential to cause significant effects in-combination with effects arising from any other plans or projects. It is concluded that the project is not foreseen to give rise to any significant adverse effects on any designated European sites, alone or in combination with other plans or projects.</p> <p>This evaluation is made given the conservation objectives of the habitats or species for which these sites have been designated. Consequently, a Stage Two AA (Natura Impact Statement) is not required for the project. EIA Environmental Impact Assessment is not required because the proposed development is not of a class listed in Schedule 5 and is of nature and scale such that there is no real likelihood of significant effects on the environment arising. It is concluded that, under Article 103 of the Regulations of 2001, there is no requirement for an Environmental Impact Assessment to be carried out for the proposed development. Therefore, there is no requirement for an Environmental Impact Assessment Report to be prepared.</p>
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3	National Monuments Service (NMS) of the Department of Culture, Heritage and the Gaeltacht.	Engage the services of a suitably qualified archaeologist to monitor all topsoil stripping and overburden at the development site	Archaeological monitoring	A suitably qualified archaeologist will be engaged during the groundwork stages of work as topsoil is moved on the site. Should archaeological material be found during the course of monitoring, the archaeologist may have work stopped pending a decision on how best to deal with the archaeology. In which case, South Dublin County Council will be advised by the National Monuments Service, regarding any mitigation measures necessary, to ensure preservation of any features of archaeological interest found.
4	National Parks & Wildlife Service (NPWS) also of the Department of Culture, Heritage and the Gaeltacht.	Otter protection of its resting and breeding places	Nature Conservation	South Dublin County Council will have the River Camac in the vicinity of the proposed development surveyed for the presence of otters by a suitably qualified ecologist. This survey report will set out measures considered necessary to mitigate the impact of the proposed development and this report will be referred to The National Parks and Wildlife Service and to the South Dublin County Council Heritage Officer.
5	Geological Survey Ireland	Site investigations	Groundwater	The proposed site was considered for Integrated Constructed Wetlands at the preliminary design stage but was not considered suitable.