

DEPUTY PLANNING OFFICER

APPLICATION No.	5400/22
PROPOSAL	Permission is sought for the demolition of existing dwelling & site structures, and the construction of a six-storey apartment building comprising 13 No. apartment units (9 No. 1-bed units and 3 No. 2-bed units & 1 No. three bed) with associated balconies/terraces, the provision of 3 no. communal open space areas at ground level and on third floor and fourth floor terraces, ancillary areas for bicycle parking, refuse storage, apartment storage room, associated plant room at ground floor, amendments to the boundaries as required to facilitate the development in relation to the bounding properties to the south and west, maintaining in place a vehicular access with gate providing wayleave access to the side serving the rear of No 28, Bow Lane West, with associated landscaping & site works.
LOCATION	29, Bow Lane West, Dublin 8, D08V44T
APPLICANT	Ixeter Property DAC
DATE LODGED	08-Dec-2022
ZONING	
APPLICATION TYPE	Permission

10/02/23**LC/EB****Site Notice:**

Site notice(s) in order 19th January 2023

Pre Planning Meeting(s):

None stated

Zoning & Policy:

The subject site has the Land Use Zoning Objective Z1 - 'To protect, provide and improve residential amenities.'

The subject site is also located within the boundary of SDRA 7 Heuston and Environs.

Site Description:

The subject site is located on the south side of Bow Lane West opposite the grounds of St Patrick's University Hospital. The site has an overall area of 0.8 hectares and is currently occupied by a two storey warehouse building.

The site is located approximately 160 metres west of the junction of Bow Street West with James's Street and Steven's Lane. Two storey terraced houses adjoin the site to the east. A six storey apartment building is located further to the east. To the west of the site there are three to four storey warehouses and a four storey apartment development. The site is bounded to the south by the rear of a four storey apartment building and two storey commercial buildings which front onto James's Street.

Proposed Development:

Permission is sought for the demolition of existing dwelling & site structures, and the construction of:

- a six-storey apartment building comprising 13 No. apartment units

- 9 No. 1-bed units
 - 3 No. 2-bed units
 - 1 No. three bed
- associated balconies/terraces,
 - the provision of 3 no. communal open space areas at ground level and on third floor and fourth floor terraces,
 - ancillary areas for bicycle parking, refuse storage, apartment storage room, associated plant room at ground floor,
 - amendments to the boundaries as required to facilitate the development in relation to the bounding properties to the south and west,
 - maintaining in place a vehicular access with gate providing wayleave access to the side serving the rear of No 28, Bow Lane West,
 - with associated landscaping & site works.

Planning History:

There is no recent relevant planning history relating to the subject site.

Relevant Policy from Development Plan 2022-2028

Dublin City Council's policy regarding such developments is set down in the Dublin City Development Plan 2022 -2028.

Policy QHSN2 National Guidelines

To have regard to the DEHLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2020), 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009), Housing Options for our Aging Population 2019, the Design Manual for Quality Housing (2022), the Design Manual for Urban Roads and Streets (DMURS) (2019), the Urban Development and Building Height Guidelines for Planning Authorities (2018) and the Affordable Housing Act 2021 including Part 2 Section 6 with regard to community land trusts and/or other appropriate mechanisms in the provision of dwellings.

Policy QHSN6 Urban Consolidation

To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation.

Policy QHSN10 Urban Density

To promote residential development at sustainable densities throughout the city in accordance with the core strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.

Section 5.5.3 Healthy Placemaking and the 15-Minute City

The 15-minute city concept envisages that within 15 minutes on foot or bike from where they live, that people should have the ability to access most of their daily needs. In order to realise the 15-minute city, it is envisaged that all new developments and existing neighbourhoods will require extensive investment in public transport, walking and cycling infrastructure and supporting measures, including retro-fitting and reconfiguration of established urban streets, and the Council supports measures in this regard.

Policy QHSN11 15-Minute City

To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces

served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.

Objective QHSNO4 Densification of Suburbs

To support the ongoing densification of the suburbs and prepare a design guide regarding innovative housing models, designs and solutions for infill development, backland development, mews development, re-use of existing housing stock and best practice for attic conversions.

Policy QHSN22 Adaptable and Flexible Housing

To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Lifetime Homes Guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government's 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007) and the Universal Design Guidelines for Homes in Ireland 2015.

Policy QHSN37: Houses and Apartments

To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation.

Policy QHSN38: Housing and Apartment Mix

To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and the HNDA, with supporting community facilities and residential amenities.

Section 14.7.4 Key Urban Villages and Urban Villages

This section sets out general principles and requirements with regard to development in Key Urban Villages /Urban Villages.

Section 15.2.3 Planning Application Documentation – Planning Thresholds

This section notes that planning applications should be supported by the necessary analysis and documentation to demonstrate the proposed design and rationale for a scheme. Table 15-1 sets out that for a residential development of this size, applications should include a Housing Quality Assessment, a Landscape Design Report, a Planning Report, an Operational Management Statement, a Mobility Management Plan/Travel Plan, as well as Engineering Services Report, Construction Management Plan, Construction Demolition Management Plan, Operational Waste Management Plan, Climate Action and Energy Statement, Surface Water Management Plan, and all developments require Appropriate Assessment Screening.

Section 15.5.2 Infill Development

This section sets out requirements for infill development in general.

Section 15.8 Residential Development

This section sets out the general requirements for residential development.

15.8.8 Play Infrastructure

Applications which include the provision of public open space shall be subject to a requirement to provide for appropriate playground facilities. In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building.

Section 15.9 Apartment Standards

This section sets out the general requirements for apartment development and includes a number of qualitative and quantitative standards such as unit mix, unit size and layout, dual aspect, floor to ceiling height, lift stair cores and entrance lobbies, internal storage, private amenity space, communal amenity space, roof terraces, internal communal facilities, security, access and services, refuse storage, lifecycle reports, operational management and maintenance, microclimate, daylight and sunlight, wind, noise, separation distances, overlooking and overbearance.

Relevant Policy Guidelines

Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, DoECLG, March 2018

Guidelines for Planning Authorities, Sustainable Residential Development in Urban Areas & Best Practice Urban Design Manual, DoEHLG, December 2008.

Quality Housing for Sustainable Communities – Best Practice Guidelines for delivering Homes Sustaining Communities, DoEHLG, 2007.

Observations/Submissions:

No submissions were received in relation to this application.

Interdepartmental Report(s):

- | | |
|--|---------------|
| 1. Drainage Division: | FI Requested |
| 2. Roads & Traffic Planning Division: | FI Requested. |
| 3. City Archaeologist: | FI Requested |

Consultee's /Interested Parties:

Irish Water: No report to date.

Transport Infrastructure Ireland (TII): No observations

Planning Assessment:

The applicant seeks planning permission to demolish the existing two-storey dwelling in order to construct a six-storey apartment building comprising 13no. apartment units.

Zoning

The subject site has the Land Use Zoning Objective Z1 'To protect, provide and improve residential amenities.' Residential use is permissible under the land use zoning for the site.

Layout

The development is located on the south side of Bow Street West. The 'L' shaped apartment block is six storeys (sixth floor set back) and is situated along the northern and eastern boundaries of the site. To the rear (south boundary) the development gradually steps down to a five storey then three storey return then to one storey where the site adjoins the car parking area associated with Phoenix Apartments complex.

Density, Plot Ratio and Site Coverage

The development provides 13 no. units. Indicative plot ratio and site coverage standards are set out in the Dublin City Development Plan 2022-2028. Plot ratio standards for Z1 Inner City range from 0.5 -2.0 and site coverage standards for Z1 is 45%-60%. The stated plot ratio is 3.15 and site coverage is 67%.

Impact on local Character

The proposed development is six storeys with a maximum stated height of 20 metres with a partial set back at fifth floor level to provide a recessed balcony.

It is noted that the development is located within SDRA 7 Heuston and Environs which contains a set of guiding principles for new development including '*The successful interconnection between the development site and adjacent urban structure.*'

The accompanying design statement indicates that the height of the development takes cognisance from the nearby 6-storey apartment scheme that was approved under DCC Reg Ref: 2115/20 at No26 & 27 Bow Lane and the long established apartment complex located to the east, at No.35 Bow Lane. It should be noted that the development approved under DCC 2115/20 initially proposed an eight storey scheme, however this was reduced to 7-storeys following FI and then further reduced to six storeys by way of a condition of approval.

Whilst the proposal represents a significant departure from the historic character along Bow Lane, as defined by the remaining two storey, terraced type dwellings that adjoin the site, it is considered that Bow Lane West is now in the process of change in terms of scale and density, and the proposal has been designed to respond to this context.

It is considered that the local area is evolving by virtue of the ongoing construction of permitted higher density development schemes. In this context, the 6-storey development proposal which accords with both established and permitted Building Heights along the wider street, and seeks to deliver residential development on a previously developed and highly accessible site as advocated in National Planning Policy, would not by itself, adversely impact on the existing character of Bow Lane West.

The applicant has submitted photomontages in conjunction with the application with views of the proposed development shown from Bow Lane West in an easterly and westerly direction. As outlined above the six storey structure would be in proportion with existing, nearby apartment buildings along Bow Lane in terms of height, bulk and mass. It is considered that the building would not appear visually incongruous in the context of the existing streetscape.

Having regard to the location of the site on Bow Lane West and the surrounding new urban structure which comprises recently constructed and modern apartment developments which range from four to six storeys, there are no concerns regarding the height of the development at six storeys, which would contribute towards a coherent streetscape at this location.

Impact on Residential Amenity

The layout of the apartment block results in a six storey block viewed in the context of several existing six storey residential blocks fronting Bow Lane. There are south facing external balconies and west facing recessed balconies proposed on floors 1 to 5 of the development including two 'green-blue roofs' at third and fourth floor levels; a communal open space area is also provided at ground floor level.

The site plan indicates a separation distance of approximately 22m between the western balconies and the apartment development approved under DCC Reg Ref: 3127/21. In terms of the apartment located to the east which has rear balconies angled towards the site, it is noted from the elevations that the proposal would not present any openings onto these private spaces. The submitted Overshadowing assessment indicates that the proposal would increase the extent of overshadowing post 18:00, in an eastern direction towards existing balconies. However, it should be noted that due to the design of the host building, these spaces are currently overshadowed during this period. Therefore it is considered that residential amenity standards would not be greatly reduced as a result of the subject development.

The layout of the apartment block results in a six storey block adjoining No. 28 Bow Lane West, a two storey terraced house. There are west facing balconies proposed within the development which are located approximately 6.5m from the rear garden of this adjoining property. Also, there are concerns regarding the potential overlooking from the south-facing balconies and the rear balconies at Phoenix View. The applicant should be requested to address this issue.

Floor Areas and Development Standards

In total 13no. apartments are provided comprising the following mix of units:

- 9 x 1 bedroom units floor areas ranging from 45sq m to 53 sq m
- 3 x 2 bedroom units floor areas ranging from 83 sq m to 92 sq m
- 1 x 3-bedroom unit floor area 105 sq m

It is considered that the mix and floor areas comply with Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, DoHPLG, December 2018.

Dual Aspect

With regard to dual aspect apartments the DoECLG guidelines require a minimum of 33% of the units to be dual aspect. Furthermore, the DoECLG guidelines state that north facing single aspect apartments may be considered where overlooking a significant amenity such as a public park, garden or formal space, or a water body or some other amenity feature.

The applicant's housing quality schedule indicates that 5 of the 13 no. apartments are dual aspect. The location of the apartments have been identified and comply with Figure 15.2: Example of Dual Aspect Residential Unit as set out in Section 15.9.3 of the City Development Plan.

Floor to Ceiling Height

The current Development Plan and the DoECLG guidelines require ground floor level apartments to have a minimum floor to ceiling height of 2.7m to reduce the potential for overshadowing. A minimum floor to ceiling height of 2.4m is required at all other levels. The sections submitted indicate that floor to ceiling heights are a minimum of 2.7 metres.

Lift and Stair Cores

DoECLG guidelines require a maximum of 12 apartments per floor per individual stair/lift core. The proposal provides maximum of 3 no. apartments per stair/lift core.

Storage

The Housing Quality Assessment indicates that all apartment meet with storage requirements. Waste storage spaces are provided at ground floor level for the apartments adjacent to the circulation cores.

Private Amenity Space

The DoECLG guidelines sets out private open space requirements for apartment developments. It states that private open space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels. The minimum private open requirement for apartments is 4sqm for a studio; 5sqm for a 1-bed and 7sqm for a 2-bed. The Housing Quality Assessment provided indicates the private amenity space for all apartments meets the minimum requirement.

Communal & Public Open Space

The DoECLG guidelines sets out communal open space requirements for apartment developments. The minimum area for communal open space for the development is 75 sq m. In total 122 sq m of communal open space is provided in the form of:

- Ground floor communal space 43 sq m;
- Third floor terrace: 43 sq m;
- Fourth floor terrace: 43 sq m;
- Fourth floor: 36 sq m

In terms of public open space, the applicant has indicated a willingness to pay a financial contribution in lieu of the same.

Sunlight/Daylight report

The applicant has submitted a daylight/sunlight report which measures the levels of internal daylight of the apartments and the sunlight levels of private amenity spaces and communal spaces in accordance with the requirements of 'Site Layout Planning for Daylight and Sunlight' (2nd edition).

The report analyses the ADF of each bedroom, living room/dining/kitchen to each apartment across ground to fifth floor level. It concludes that the ADF for all habitable rooms on all floors completes with the strict ADF requirements. The overall average of the tested bedrooms is 2.9% and the living/kitchen/dining is 3.11%. When considered against the BRE targets of 1.0% and 2.0% respectively, it is considered that the proposed occupants would benefit from a suitable level of sunlight penetration.

Communal Open space

In terms of communal open space, the shadow/sunlight study indicates that the communal amenity areas on the third & fourth floor level would receive in excess of 2 hrs of sunlight. These areas have a combined total of 79 sq m. The 43 sq m ground level communal area would only receive sunlight during the June period and therefore fails to meet the minimum standards. It is considered that the applicant should ensure that this area comprises hard landscaping.

The current provision communal open space is considered acceptable given the infill nature of the site and its location in the inner city in this instance.

Transportation Matters

Location and access

The subject site is located on Bow Lane West and pedestrian access to the city centre is to the east via James Street and Thomas Street. The pedestrian footpath provision linking the subject site to the city centre is generally good. There are no cycle lanes on Bow Lane West, but there are various sections of mandatory and advisory cycle lanes as well as shared bus lanes for cyclists within the local road network.

The nearest bus stop is c. 350m east on James Street which is served by frequent Bus Route 13, 40 and 123. The Luas James's stop is within walking distance, c. 450 m, but involves crossing James's Street. Heuston Railway station is a c. 600m and provides intercity and commuter connections. The nearest Dublin bikes station is located on Grand Canal Place which is c. 500m from the proposed development.

A Mobility Management Plan has not been included in the submission.

The existing development is two storey residential with a large yard to the rear and benefits from vehicular access; there is a way-leave from this access along the western boundary of the site which provides vehicular access to the rear of 28 and 28a Bow Lane. The proposed development comprises a 6 storey, 13 unit (18 bedrooms) apartment building. It is proposed to maintain the wayleave, although it is noted that it is proposed to build over the wayleave. Submitted drawings indicate the proposed entrance and access lane will be 3.0m width, with a height restriction of c. 2.8m. No swept path analysis has been submitted demonstrating vehicular access along the lane (way-leave) to the parking area to the rear of no. 28 and 28a Bow Lane, it is not clear if existing vehicular access/egress is being impacted on. This division has concerns that the proposed access lane may lead to reversing movement of vehicles along the lane and onto the public road posing a hazard to pedestrians/cyclist and other road users; this is not acceptable.

It is noted that there is an access door off the vehicular access lane, which provides access to the cycle parking and bin store. There are also stairs from the vehicular lane down to the rear landscaped area indicating that the lane is a shared pedestrian/cyclist/vehicular surface. The limited use of the lane is noted, and as such limited opportunities for pedestrian/cyclist/vehicular conflict.

From review of submitted plans, the proposed building does not appear to encroach upon the public footpath.

Cycle parking

The applicant has proposed 24 no. secure cycle parking spaces (18 resident and 6 visitor) located on the ground floor in two compounds (visitor and resident) in a secure part of the development which can be accessed from Bow Lane West and as well as off the internal vehicular lane along the western boundary. It is not clear how visitors will readily be able to gain access to the cycle parking.

The proposed quantum is in line with Development Plan 2022-2028 Standards, Appendix 5, Table 1. However, Table 1, residential apartments, Note 3, notes to include provision for e-bikes/cargo bikes/bike trailers/adapted bikes; submitted information indicates that no provision has been made.

Access doors to cycle parking areas should be a minimum 1.2m in width, doors to not appear to be adequate width to provide ease of access for a dismounted cyclist. The proposed type of cycle parking is unclear, it is not clear if there is adequate space to accommodate the proposed no. of spaces, and there appears to be inadequate room within the compounds to manoeuvre with as little as 0.9m between the rows. It is not clear if the cycle parking store is adequate in size to accommodate the proposed 8 no. cycle spaces. Adequate quality of cycle parking in terms of type of stands, ease of access and manoeuvrability has not been demonstrated.

Car parking

The applicant does not propose to provide any car parking for the development. The application site is located within Parking Standards Zone 1 of Map J of the Dublin City Development Plan 2022-2028. Appendix 5, Table 2, outlines the maximum car parking standards for residential development in Zone 1 as 0.5 space per dwelling, which would result in a maximum requirement of 9 spaces.

The submission does not reference the availability of existing car share facilities within the area and none are proposed. It is however noted that there are a number of public car share locations in the vicinity of the development. The applicant, with the exception of cycle parking provision, has submitted limited information to demonstrate the suitability of the subject site in relation to no car parking provision and a mobility or residential travel plan have not been included in the submission.

There are double yellow lines on the northside of Bow Lane West and a single yellow line on the south side of the street which does not permit car parking between 07:00 and 19:00hrs directly outside the proposed development. On street parking is controlled on surrounding streets.

Whilst it would be the preference of this division that some car storage or car share spaces would be provided on site, the small number of units proposed are noted as well as the limitations of the subject site, the proximity to the city centre, control of on street parking within the area and nearby public transport. The no car parking provision is considered acceptable in this instance. A Residential Travel Plan should be conditioned.

Waste Collection

The applicant has not provided any details in terms of the management of the waste collection. There is a bin storage area located at ground floor level, accessible from Bow Lane West. A temporary waste collection area to store the waste receptacles prior to collection has not been outlined within the documents submitted. It should be noted that the storage of bins on the public footpath is not supported by this division. Bins, on collection days, should be stored within the curtilage of the site.

Servicing

Details on how deliveries and servicing are to be managed have not been provided. As noted above there are parking restrictions on both sides of Bow Lane East which will allow for restricted active loading time. The nearest on-street parking bay is located approximately 100m west of the proposed development. As the development of a small scale and located on a relatively quiet street and parking/loading is available relatively close, the proposed is acceptable in this instance.

Construction Management

An outline Construction Management Plan (CMP) has not been submitted. It is considered that should a grant of permission be forthcoming a condition should be attached requiring a final CMP be submitted and agreed with the Planning Authority on appointment of the main contractor.

Archaeological impacts

It can be demonstrated that the subject site is located in the Zone of Archaeological Interest for the RMP DU018-020 (Historic City), with buildings present on the subject site from at least the eighteenth century, and so there is potential for archaeological features/deposits to exist at subsurface level on the proposed site. There was no consultation with the City Archaeologist prior to the application being lodged and there was no archaeological impact assessment included with the application.

Given the above, the site should be archaeologically assessed as Additional Information. This will enable the Planning Authority to formulate an informed recommendation before a planning decision is made.

Appropriate Assessment:

The development has been screened for AA. It has been found that significant effects are not likely to arise, either alone or in combination with other plans and projects that will result in significant effects to any Natura 2000 area. A full Appropriate Assessment of this project is therefore not required.

Conclusion

Given the issues identified above, as well as the drainage and TPD issues it is considered that additional information be requested as follows.

1. The layout of the apartment block results in a six storey block adjoining No. 28 Bow Lane West, a two storey terraced house. There are west facing balconies proposed within the development which are located approximately 6.5m from the rear garden of this adjoining property. Also, there are concerns regarding the potential overlooking from the south-facing balconies and the rear balconies at Phoenix View. The applicant is requested to address these potential impacts on existing residential amenity.

2. The applicant is requested to address the following issues which were raised by the Transportation Planning Department:

a) No swept path analysis has been submitted demonstrating vehicular access along the lane (way-leave) to the parking area to the rear of no. 28 and 28a Bow Lane, it is not clear if existing vehicular access/egress is being impacted on. The applicant is requested to clarify and demonstrate any access proposals. Reversing vehicles onto the public road would not be acceptable.

b) The applicant is requested to provide details of proposed cycle parking, including specification of stands, and to demonstrate sufficient area and height is provided to accommodate the cycle parking. Doors providing access to cycle parking should be a minimum of 1.2m width. Cycle stands should allow both wheel and frame to be locked. Ease of access and manoeuvrability as well as security (i.e. key/fob access) should be demonstrated. Electric charging points for e-bikes within the cycle store. Cycle parking design shall allow both wheel and frame to be locked. Provision for parking of cargo bikes/bike trailers/adapted bikes should be made, this is essential to support car free living.

3. The applicant is requested to address the following issues which were raised by the Drainage Department:

a) The Flood Risk Assessment should be expanded to appraise the risk of pluvial flooding to the development. The applicant is requested to pay particular regard to pluvial flood maps prepared as part of the EU IVB Flood Resilient City Project. These indicate that the proposed development might be at risk of flooding in a 1% AEP pluvial event.

b) A comprehensive engineering services report, detailing how foul and surface water is proposed to be managed is required. The report should include a surface water management plan outlining how surface water will be managed in a sustainable way incorporating Sustainable Urban Drainage Systems (SuDS) designed in accordance with the requirements of the DCC's Sustainable Drainage Design & Evaluation Guide (2021).

c) In accordance with Policy SI23 of the Dublin City Development Plan 2022-2028, all new developments with roof areas in excess of 100 sq. metres should provide for a green blue roof. Depending on the type of green roof, a minimum coverage of 50% of the total roof area is required where intensive green roof is proposed and 70% where extensive green roof is proposed. Surface water attenuation storage should be provided at roof level incorporated into the roof build up. The applicant is requested to submit a revised proposal in regards to the green blue roof coverage, build up and attenuation provision. The design of the green blue roof should comply with the requirements of Dublin City Council's Green & Blue Roof Guide (2021), summarised in Appendix 11 of the Dublin City Development Plan 2022-2028.

The Applicant is requested to consult with the Drainage Division of Dublin City Council prior to the submission of Additional Information to ensure all concerns are addressed.

4. The applicant is requested to address the following issues which were raised by the City Archaeologist:

a) The applicant is requested to submit an Archaeological Assessment, as outlined in Section 3.6 of the Framework and Principles for the protection of the archaeological heritage (1999). It is recommended that the City Archaeologist is consulted in advance of preparing this information.