

PLANNING REPORT

FOR A

STRATEGIC HOUSING DEVELOPMENT

AT

‘TEMPLAR PLACE’

FORMER MALL SHOPPING CENTRE

QUAY STREET & HIGH STREET

BALBRIGGAN

CO. DUBLIN

PREPARED BY



ON BEHALF OF

RHONELLEN DEVELOPMENTS LTD.

AUGUST 2021

INTRODUCTION

On behalf of the applicant, Rhonnellen Developments Ltd., this planning report accompanies a planning application to An Bord Pleanála under Section 4 of the Planning and Development (Housing) and Residential Tenancies Act (2016) for a proposed Strategic Housing Development on a vacant, brownfield site located in Balbriggan Town Centre.

This document should be read in conjunction with the accompanying detailed documentation prepared by MDO Architects; CSR Landscape Architecture; ORS Consulting Engineers, IN2 Consulting Engineers, JBA Consulting Engineers, Varming Consulting Engineers, D3D Geomatics, Visualisations, Whitehill Environmental, Wildlife Surveys Ireland, Aramark, & Traynor Environmental.

SUBJECT SITE

The subject site is a brownfield site located within the town centre of Balbriggan, with a street frontage on Quay Street to the north, and High Street to the east.

The site is located within the Balbriggan Historic Centre Architectural Conservation Area (ACA). The majority of the applicant site is occupied by a 1980's purpose-built supermarket, with a surface car park on the roof. The building is vacant and in poor condition. There is also a vernacular outbuilding orientated in an east west direction on the subject site. This structure has been in use as a bicycle and angling shop.

None of the buildings within the applicant site are protected structures. It is proposed to demolish these as part of the proposed development.

Along Quay Street there is currently pedestrian access into the former "Mall Shopping Centre" along with delivery vehicle access into a small service yard to the north. The primary vehicular access for the site is from High Street.

There is a very steep embankment to the north-east of the site, with a difference in level from High Street to Quay Street of c. 9m.

High Street slopes upwards from North to South and consists of primarily residential development. A terrace of single storey cottages is situated along the north-east boundary of the site. Across the road are two storey terraced houses.

Bounding the site to the south is a 4 storey apartment building including a setback penthouse level. Directly beside it is Balbriggan Library which consists of the 18th century 2-storey Carnegie Library, a protected structure and a contemporary 3 storey extension with a frontage onto St. George's Square.

Along Bridge Street, next to Balbriggan Library is the Bracken Court Hotel, a stepped 5 storey building with a formal street frontage. Bridge street is one of the busiest streets in Balbriggan Town, containing a variety of shops, cafes, banks and other civic and commercial amenities. The heights of the buildings on Bridge Street, that share a boundary with the site vary from 2- 5 storeys.



Figure 1 Site Location



Figure 2 Site Location within Balbriggan Historic Centre ACA

The buildings within the ACA vary in scale and form, from the civic buildings on Georges Square to the modest terraced cottages along Quay Street and High Street. This diversity brings a rich character to the historic core. The residential buildings have traditional, vernacular forms which sit in pleasing contrast against the monolithic form of the courthouse and characterful Carnegie Library, complete with a turreted clock tower.

Within the wider Town Centre area building heights also vary with the traditional 2 storey streetscapes interspersed with contemporary developments up to 5 storeys.



Bracken Court Hotel



George's Hill



George's Hill



Mill Street and George's Hill

Although the site is located in the bustling heart of Balbriggan Town, with many buildings of architectural merit nearby, it is unfortunate that there are also many disused, boarded up frontages that are falling into disrepair in the town centre.

This brownfield site is presently under-utilised, and the existing shopping mall detracts from the ACA. Its removal and subsequent proposed redevelopment present an opportunity to repair the urban fabric and positively contribute to the historic town centre.

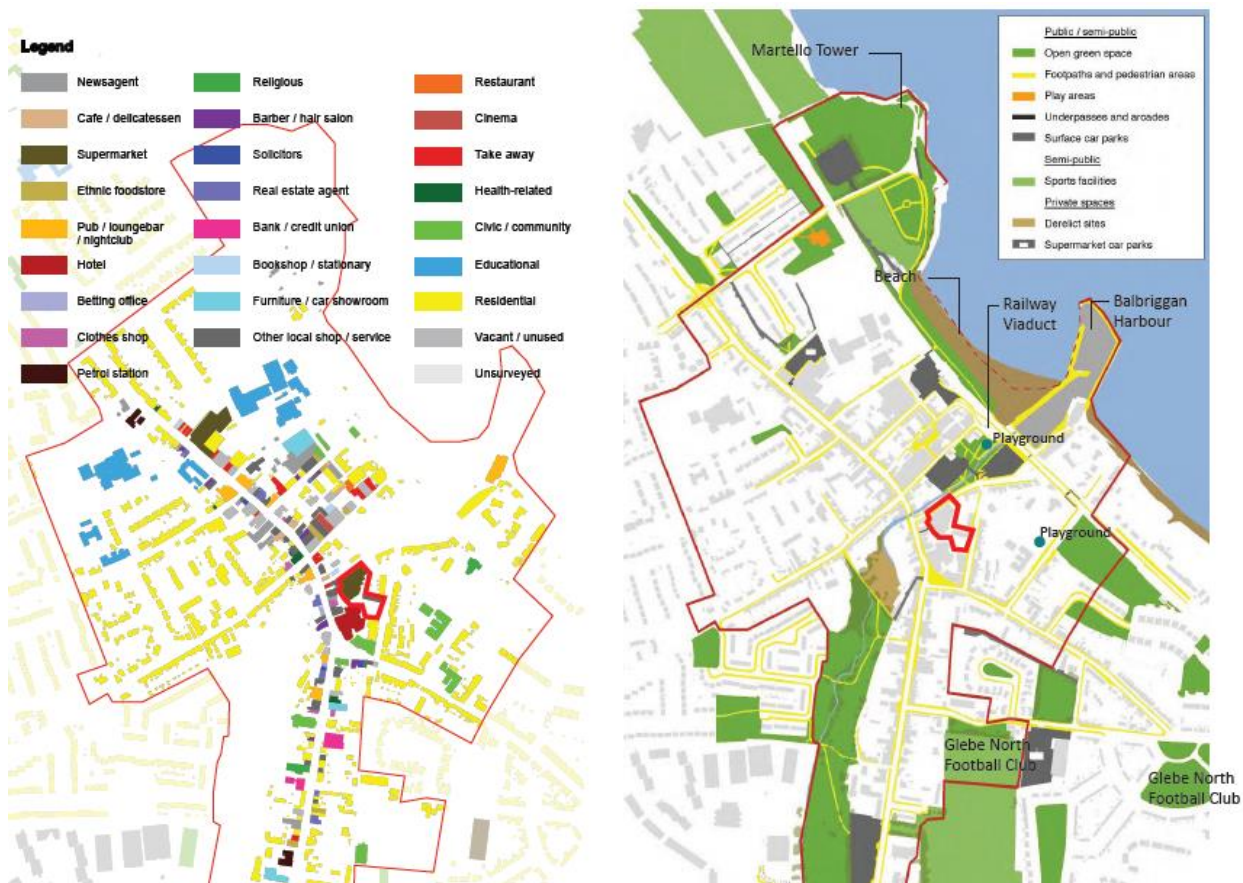


Figure 3 Map of Services and Amenities in Balbriggan Town Centre. Source: MDO Architects

The site is located immediate to excellent facilities including numerous shops, grocery stores, pubs, restaurants, civic facilities such as Balbriggan Library and schools, all within a 500 m. radius. The site is located around the corner from Bridge Street, one of the main thoroughfares in the town, populated with small locally owned and run businesses.

Proximate to the site are a variety of green open spaces, parks, pedestrian walkways, sports pitches, playgrounds, Balbriggan Beach and Harbour.

The site is very well served by public transportation. It is located within 250m (as the crow flies). of Balbriggan Train Station which is served by the Northern Commuter Train Line. As part of the current DART+ programme the NTA is planning to extend DART services on all commuter lines including the Northern Commuter to Drogheda which will mean increased services and capacity to serve Balbriggan.

The town centre site is also within 500m walk of several bus routes:

- Bus Eireann 101 Dublin- Drogheda
- Bus Eireann 101X Drogheda-Balbriggan-Dublin City
- Balbriggan Express 191 Stamullen – Balrothery- Balbriggan –City Centre
- Bus Eireann B1- Route local to Balbriggan Town
- Dublin Bus 33 Lower Abbey Street towards Balbriggan
- Dublin Bus 33a Lower Abbey Street to Balbriggan via Dublin Airport
- Dublin Bus 33X Custom House Quay/ St. Stephen's Green towards Skerries, morning and evening rush hour service
- Local Link 195 Bus Ashbourne- Balbriggan

PROPOSED DEVELOPMENT

The proposed development will comprise the following:

- Demolition of existing buildings (including former supermarket building, car park, substation, and outbuildings (partially in retail use)).
- Construction of a Build to Rent (BTR) development comprising 3 no. apartment blocks (Blocks A - C) ranging in height from 3 to 6 storeys (with Block B over 3 no. lower courtyard floors) providing a total of 101 units (19 no. studios, 41 no. 1-beds, 41 no. 2-beds).
- Provision of Resident Support Facilities/Resident Services and Amenities (c.217.03 sq.m)
- Provision of 2 no. retail units (c.110.15 sq.m)
- Provision of 25 no. car parking spaces (at ground floor and accessed from Quay Street), 182 no. cycle parking spaces.
- Provision of ESB substation/switch room, plant areas, bin stores, telecoms areas.
- Provision of open spaces, landscaping, boundary treatments, all associated site works and services provision.
-

Development Proposal	Statistics
No. of apartments	101 apartments
Site Area	0.42 ha
Residential Density	240 units per ha
Site Coverage	59%
Building Height	Up to 6 storeys facing the public streets with Block B over 3 lower courtyard floors
Communal Open Space	1,400 sq.m (33%)
Carparking	25 (0.25 per unit)
Cycle parking	182 (1.8 per unit)







Figures 5-8: Photomontages & CGIs of Proposed Development. Source: D3D Visualizations.

PLANNING HISTORY

There is one previous planning permission pertaining to the site:

Reg. Ref. F00A/0707 - Permission granted by Fingal County Council on 10th July 2001 for the demolition of High Street shop units and the shopping centre roof top structure and to construct a mixed use development contained in two and three-storey blocks. The development comprised 41 no. dwelling units 627 sq.m of office space, 375 sq.m of retail and a 741 sq.m extension to the shopping centre. The proposal also included the provision of 184 no. car parking spaces.

This application was subsequently appealed to An Bord Pleanála (Ref. PL06F.125910) in which the decision to grant permission was upheld by the Board.

In granting permission, the Order from the Board stated the following reasons for its decision to grant permission:

‘Having regard to the zoning objective for the area as set out in the current development plan for the area. to the town centre location of the site, its accessibility to public transport and its design it is considered that, subject to compliance with the conditions set out to the Second Schedule, the proposed development would not seriously injure the amenities of the area or of property in the vicinity, would be acceptable in terms of traffic safety and convenience and would, otherwise, be in accordance with the proper planning and sustainable development of the area.’

BUILD TO RENT PROPOSAL

The proposed development is for a Build to Rent apartment scheme. This site is considered to be an appropriate location for a Build to Rent development due to its location within Balbriggan Town Centre and adjacent to a major transport corridor – the Northern Commuter Railway Line that runs between Dundalk and Dublin with a stop at Balbriggan.

Ireland's housing market is constantly evolving. One of the typologies that there is a growing demand for, following the existing situation in many comparable cities in Europe, is for rented accommodation in the form of apartments. This cultural shift is due to decreasing size of households, a population boom, unaffordable homes for first time buyers, more transient, internationally mobile and high skilled employees and the recognised flexibility renting offers.

The promotion of the Build to Rent typology in the *Apartment Guidelines* is a recognition by the government of this situation. It aims to provide a viable long-term housing solution beyond traditional home ownership for those seeking an alternative option to our current housing mix. These developments consist of purpose-built residential units which are managed and maintained and include communal spaces, which will contribute to the residential amenity and sustainable development of apartment stock.

The Build-to-Rent typology is defined within the Apartment Guidelines as:

'Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord.'

Rebuilding Ireland policy has identified that *'there is a significant requirement to expand the build-to-rent sector which is not being catered for in current construction levels'*. This is reflected in the *National Planning Framework (Ireland 2040)*, which estimates a need to house one million new people by 2040, focusing development on the top 5 cities, some 50% of that development within Dublin. In line with the NPF, the Apartment Guidelines and the *Urban Development and Building Height Guidelines, December 2018* are directing development to be targeted at brownfield and infill sites first. Sustainable and accessible sites near transport and employment have priority.

Build to Rent developments which enable the accelerated delivery of new housing at significantly larger scale, will make a substantial contribution to the delivery of homes nationwide, thereby reducing pressures on the rental sectors, and the gap between affordability and appropriate living standards.

Build-to-Rent schemes, such as the one proposed, offer a maintained and high standard accommodation with the security of a management company. Specific Planning Policy Requirement 7 as set out in the *Apartment Guidelines, 2018* ensures the delivery of appropriate levels of residential support facilities as well as high levels of amenity within apartment developments not previously achieved within apartment developments (which were often historically used as Buy to Rent accommodation). This guarantees appropriate living standards for potential occupants of the development.

As required by SPPR 7 and SPPR8 of the Apartment Guidelines, the development has been appropriately advertised as a Build to Rent development, and the appropriate covenant will be included within the application.

RESIDENTIAL AMENITY & SUSTAINABILITY

The proposed development has been designed to provide the optimum in terms of residential amenity for future residents within a town centre setting.

The development has been designed using passive solar principles. The apartments in the scheme have a predominantly east-west orientation with no single aspect apartments facing due north.

Aspect

The development achieves a 50.5% dual aspect ratio. This meets the 50% which is allowed for in Intermediate Urban Locations such as Balbriggan Town Centre under SPPR 4 of the Section 28 National Apartment Guidelines, 2018 and Objective DMS20 of the Fingal County Development Plan. None of the single aspect units are north facing.

It is also noted that Section 3.17 of the 2020 Apartment Guidelines states that 33% dual aspect provision is acceptable in some Intermediate Locations such as brownfield, town centre sites:

“...it is a policy requirement that apartment schemes deliver at least 33% of the units as dual aspect in more central and accessible and some intermediate locations, i.e. on sites near to city or town centres, close to high quality public transport or in SDZ areas, or where it is necessary to ensure good street frontage and subject to high quality design. Where there is a greater freedom in design terms, such as in larger apartment developments on greenfield or standalone brownfield regeneration sites where requirements like street frontage are less onerous, it is an objective that there shall be a minimum of 50% dual aspect apartments.”

Similarly Objective DMS21 of the County Development Plan states:

“Allow a reduced percentage of dual aspect apartments only in circumstances where it is necessary to ensure good street frontage and subject to high quality design. In no instance will the provision be less than 33% of the number of apartments in the scheme.”

As detailed on page 37 of the MDO Architects Design Statement, in order to optimise privacy, along High Street windows on the north facade of Block B and southern façade of Block A have been designed with external louvered pop-out screens in order to control the aspect and prevent direct overlooking of the neighbouring houses and gardens. These windows provide the second aspect for these units which have a primary aspect into the communal courtyard or to the street.

Such window designs, utilizing solid/opaque glazed louvers are a common device used in town and city centre brownfield developments, particularly where new schemes are located adjacent to traditional housing. It is important to note that these windows still allow both a second aspect and additional ventilation to the units concerned.

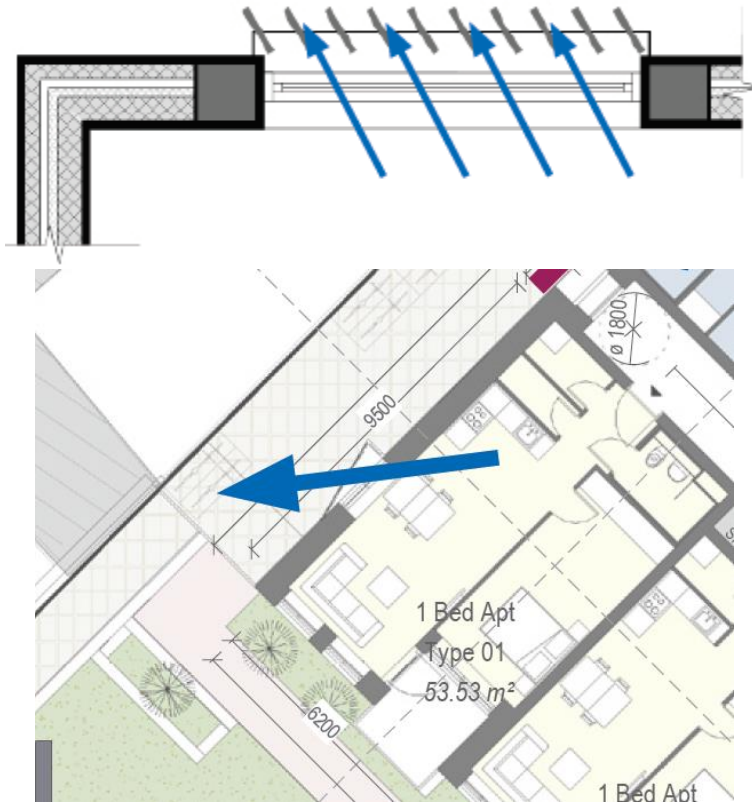


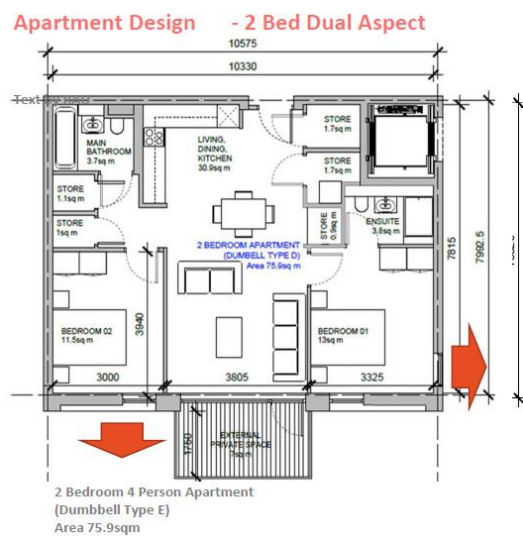
Figure 9 Extracts from Design Statement Illustrating Louvered Windows. Source: MDO Architects

Reference is also made to the 2 no. 1-bed units located at each 1st to 4th floor at Block A which have a primary aspect facing west across Quay Street, and with a second aspect facing south/north across a central set back element (c.4.7m deep). The distance between these second aspect windows is over 12m, which is generous and indeed greater than the width of Quay Street (c.7m building to building).

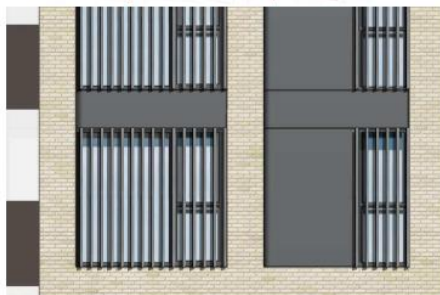
Having regard to previous ABP SHD decisions we note that this type of apartment block design has been considered acceptable in delivering dual aspect on other similar urban developments.

We note for instance permission Ref. ABP-306167-19 (Royal Canal Park Phase IV) where second aspects were provided using modulation in block elevations (not bay windows) and which, in addition to providing a second aspect, also optimise light into apartments, maintain high levels of privacy and architecturally provide variety, relief and visual interest in the streetscape. In the case of the Royal Canal Park Phase IV the Board Inspector considered this classification of dual aspect *“reasonable and acceptable”*.

It is also noted that in the above reference SHD also included a number of units with louvered window systems which were also deemed acceptable as representing dual aspect.



Angled architectural fins ensure privacy is maintained between apartments less than 22m apart.



Example of angled screening measures to ensure privacy.

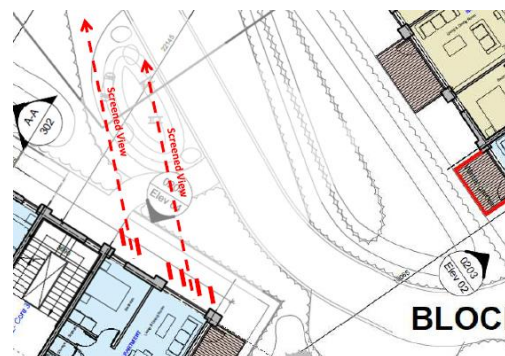


Figure 10. Extract from Design Statement for Ref. ABP-306167-19 (Royal Canal Park Phase IV) demonstrating Dual Aspect Units and Louvered Windows. Source: Reddy Architecture

Sunlight /Daylight

We refer to the Daylight & Sunlight Report prepared by IN2 which confirms the following:

- The communal amenity space will be compliant with the guidelines with 84% achieving at least two hours of sunlight over 50%+ on 21st March.
- None of the neighbouring gardens to the north are negatively impacted by the proposed development with all achieving at least two hours of sunlight over 50%+ of the garden area on 21st March.
- Of all of the neighbouring dwellings along Quay Street and High Street only one (on High Street) showed a minor impact in terms of Vertical Sky Component (VSC) (result was 74% just below the 80% threshold). This minor impact in the potential for daylight is offset by the wider planning benefits of redevelopment of this unsightly and vacant brownfield site and rejuvenation and animation of the street which will significantly benefit resident of said property.
- Received sunlight to relevant Quay Street units will not be adversely affected by the proposed new development as Annual Probable Sunlight Hours (APSH) will remain above 25% and Winter Probable Sunlight Hours (WPSH) will remain above 5%.
- In terms of Average Daylight Factors (ADF's) 97% of Living/ Dining and Bedrooms (totalling 221 of 228 rooms) assessed within the proposed development were determined to be compliant based on the following BS.8206-2: 7 standard of > 1.5% for Living/ Dining Areas, and > 1.0% for Bedrooms. 50% of the living spaces achieved an ADF in excess of 3%, and over 85% achieved 2.0%.

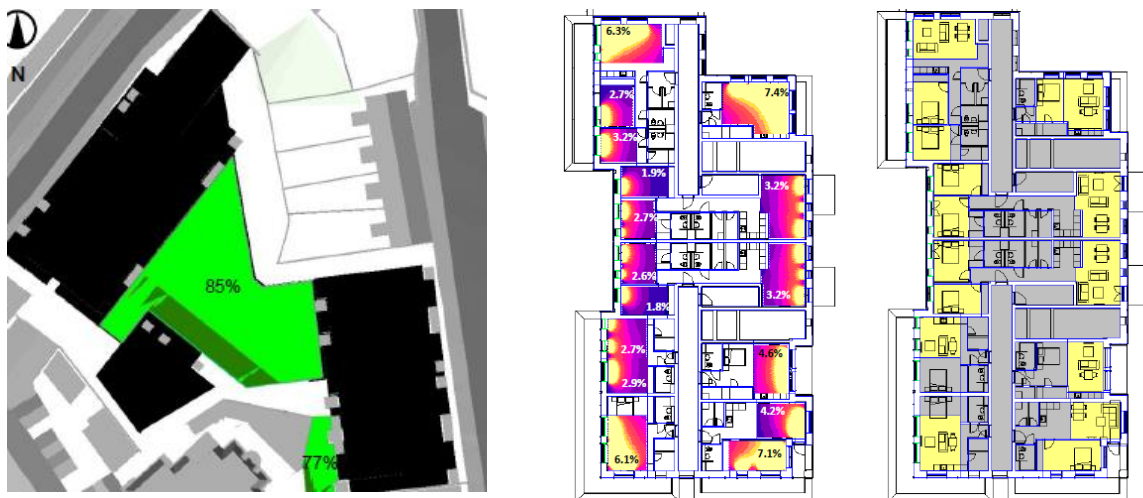


Figure 10. Extract from Daylight & Sunlight Report. Source: IN2

Wind/Microclimate

We refer to the Microclimatic Wind Analysis and Pedestrian Comfort Report prepared by IN2. The analysis concluded that all balconies and terraces throughout the development were situated in zones suitable for sitting - either as “Outdoor Dining” (blue contours) or “Pedestrian Sitting” and are therefore well suited to their intended use as private amenity spaces. At ground level the conditions have been determined to be predominantly suitable for “Outdoor Dining” and “Pedestrian Sitting”.



Figure 10. Extract from Microclimatic Wind Analysis and Pedestrian Comfort Report. Source: IN2

Open Space

A large communal open space is provided in the heart of the development to serve future residents. The central communal courtyard has been designed with a south westerly aspect, allowing it to receive ample natural light throughout the day. Please refer to the accompanying daylight, sunlight and shadow analysis report produced by IN2 for further information.

Each of the proposed apartments have been provided with private outdoor amenity spaces in the form of balconies or terraces. These balconies and terraces will provide passive surveillance with views of either High Street, Quay Street or the central communal courtyard within the scheme. The upper balconies and terraces overlooking High Street will have views of Quay Street Park and Balbriggan Train Viaduct and the Harbour.

Based on the provision of 19 no. studios, 41 no. 1-beds, 41 no. 2-beds, the minimum communal open space requirements (as per the 2020 Apartment Guidelines) would be 568 sq.m. The 1,400 sq.m communal open space is therefore far in exceedance of the minimum standard and equates to 13.9 sq.m per unit.

Unit Type	No.	COS per Unit	Total (sq.m)
Studio	19	4	76
1-bed	41	5	205
2-bed	41	7	287
Total	101		568



Figure 10. Extract of Landscape Masterplan. Source: CSR



Figure 11. Photos of Beach & Quay Street Park. Source: CSR

This town centre, brownfield site is not considered suitable or practical for provision of public open space.

In addition to the communal open space on site, residents will be able to access significant public open spaces in the vicinity including, Balbriggan Harbour and Beach, and Quay Street Playground less than 200m to the north. The Quay Street Car park area is also being proposed for a multi-purpose plaza area and a linear park alongside the Bracken River.

The Council's (and ABP's) discretion in relation to the provision of public open space outside the development area, or to provision of a financial contribution in lieu of open space is noted.

Furthermore, we note that the Balbriggan Rejuvenation Project, which includes the Quay Street and Harbour area improvements have recently been allocated €25.4m in funding under the Urban Regeneration Development Fund (URDF).

ARCHITECTURAL HERITAGE

The proposed development has been designed in full recognition of its location within the Balbriggan Historic Centre ACA and proximate to a number of protected structures.

To this end, Molloy Associates, Conservation Architects, have worked as part of the design team from the outset providing advice on the potential impact of the emerging development on its historic setting.

The Architectural Heritage Impact Assessment submitted considers that the proposed development responds positively to its town centre context by addressing High Street and Quay Street, providing a much improved streetscape and public realm. This is further elaborated as follows:

Impact on Quay Street

It replaces the existing shopping centre building which is of limited architectural interest and insensitive to the historic urban environment and Quay Street streetscape.

The proposed building in Quay Street (Block A) has been designed to reflect the fine grain of a traditional streetscape. The proposed brick and render combination proposed varies in colour and tone to subtly reinstate the visual appearance of historic urban grain.

The window openings have been designed with a strong vertical emphasis to complement the composition of the traditional fenestration pattern. The windows sizes are naturally larger than the traditional window openings to meet expectations of modern living standards, but the ratio of solid-to-void has been duly considered to complement the existing built environment.

Careful consideration has been given to the design of the gables of the new development, which will be highly visible on account of the single buildings adjoining the northern and eastern site boundaries. Windows have been introduced to animate the gables and are finished in high quality, self-finished materials that harmonise with the surrounding built environs and enhance the appearance of the buildings from the public realm.

Articulation of the recessed upper floors reduces the visual impact of the buildings as perceived at close range. The form of the building steps down towards the eastern gable of Quay Street and the upper floors have been set back to minimise the visual impact on the narrow street.

It is considered that the proposed development will have a positive visual impact on Quay Street, adding character to the Balbriggan Historic Centre ACA and will encourage pedestrian movement from the primary street (Bridge Street) to the amenity of the nearby beach. The ground floor elevation on Quay Street includes 2 retail spaces and several entrances to create an active street front.

Impact on High Street

The proposed residential building on High Street (Block B) has been designed to respect the established scale of the buildings on this residential street. The entirety of the new development is designed as a single entity; a high-quality urban intervention so that there is common architectural language and coherency to the entire scheme and consequently the design of this building is similar to Block A on Quay Street, but the building form is modelled differently to respond to the specific context of High Street.

The building sits quietly on the street to avoid competing with the prominent building at the top of the street, the Carnegie Library. The recessed balconies add depth and definition to the façade, and visually break down the scale of the building.

Respectful distances have been maintained adjacent the boundaries to avoid encroachment on the adjacent single-storey structures.

The simple material palette has been selected to harmonise with the brick of the residences and the library on High Street.

The removal of the outbuilding within the site (accessed from High Street) is required to facilitate purposeful redevelopment of the site.

The building is not a Protected Structure, nor is it included on the National Inventory of Architectural Heritage (NIAH).

The modest structure is a good, but unexceptional, example of a vernacular farm building. An additional consideration is that the structure has been significantly altered; the gable walls have been modified to increase the height of the upper floor and to alter the roof pitch. The roof structure and linings are modern, and the exterior has been finished with a cement-based, pebble-dashed render.

It is considered that the building does not meet the criteria of specialist interest in any of the eight categories as set out in Section 51 (1), of the 2000 Planning and Development Act.

The building attached to the east elevation of this structure was constructed in the early 20th century. The ESB substation serving the former supermarket is presently housed within this latter structure, with metal doors set within the gable on High Street.

The loss of any historic fabric is regrettable, but this must be balanced against the wider benefits of the sensitive redevelopment of the site on the ACA. If this outbuilding were to be retained, the location of the building would negatively impact the well-considered urban design rational of the proposed scheme.

The new buildings have been aligned with the established pattern of development to positively contribute to the High Street streetscape.

Overall it is concluded that the proposal is a well-considered scheme that positively contributes to the Balbriggan Historic Centre ACA.

TRANSPORT & CAR PARKING

The Templar Place SHD will be constructed under the BTR scheme, where parking provisions are reduced or minimised, and the sustainable means of transport is maximised. The site will offer a total of 25 No. parking spaces and all vehicles associated with the residential area of the development will be accommodated by on-site parking spaces. Based on a review of the current transport infrastructure available to the proposed site, the current network provides a significant level of connectivity with the town centre and other towns near Balbriggan, with both bus and rail services. Walking and cycling within the town are feasible activities due to the fact that any of these journeys are considered short within the town area.

Section 7.1 of the Development Plan states that in considering applications for developments within town centres the existing availability of parking in the area should be considered. Where appropriate, proposed residential units should have a car parking space per unit which would equate to 101 spaces in this instance.

The current proposal includes for a significantly lower parking standard than 1 per unit – a 0.25 parking ratio. However this is justified having regard to the town centre location, close to public transport and services.

Furthermore given that it is a Build to Rent development Policy SPPR8(iii) of the 2020 Apartment Guidelines applies, which states:

“There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures.”

The application is accompanied by a Mobility Management Plan as a transportation demand management tool for the residents’ Mobility Management Coordination Group when established. This will have the aim of reducing car use and the need for cars by increasing the attractiveness and practicality of other modes of transport. A successful Mobility Management Plan or strategic plan for a development such as the Templar Place SHD will introduce a higher than normal proportion of users into more sustainable forms of transport thus reducing environmental, economic and social impacts.

ENVIRONMENTAL CONSIDERATIONS

Schedule 5 of the Planning and Development Regulations 2018 (as amended) sets the thresholds for which if a project exceeds these limits, it then must be the subject of an Environmental Impact Assessment. Part 2 of Schedule 5 (10)(b)(i) identifies developments of more than 500 dwelling units and (iii) identifies urban development which would involve an area of greater than 2 hectares in the

case of a business district, 10 hectares in the case of other parts of a built up area and 20 hectares elsewhere.

The number of housing units proposed is 101 which is below the 500 unit threshold, while the site area at c. 0.42 ha is also well below the 2ha threshold for “urban development” within a business district.

As this is a sub EIA threshold, an EIA Screening report has been completed by MCG Planning in line with the Directive. This concludes that a sub threshold EIAR is not required for the proposed development.

An AA Screening Report is also submitted which concludes that the proposal is unlikely to have effects on the Natura 2000 Network, either alone or in combination with other plans; the development will be connected to public services such as water and foul systems; standard construction practices can be employed to mitigate any risk of noise, dust or pollution; and no identified impact in the screening exercise either individually or cumulatively will have significant impacts on the environment.

It is considered that the proposed development will not have any significant impacts on the environment. All recommended mitigation measures and standard practices will be employed throughout the construction and operation phase of the development to ensure that the proposed development will not create any significant impacts on the quality of the surrounding environment.

COMPLIANCE WITH PART V

A Part V submission in accordance with Section 96 of the Planning & Development Act, 2000 (as amended) is included along with potential Part V indicated on associated plans submitted along with indicative costs.

CHILDCARE

No creche or private childcare is proposed as part of this development. Having regard to the 2001 Childcare Guidelines as updated by the 2020 Apartment Guidelines we note that studio and 1-bed units can be excluded from the calculation of childcare demand.

Only 41 of the units are 2 bed units which is well below the 75 unit threshold of the 2001 Childcare Guidelines (as updated by the 2020 Guidelines) automatically requiring a creche.

A Childcare Assessment is submitted with this application which estimates a likely future private childcare requirement of only between 3 and 7 spaces. The Assessment also identifies 9 existing childcare providers operating within 1km distance (15 mins walk) of the proposed development with two other facilities just beyond the 1km. When contacted (in July 2021) most of the existing operators confirmed that they have capacity, totalling to c.37 spaces.

Given the scale and mix of the development, its central location, and the availability of existing services in the town, it is considered that an additional childcare facility is not required as part of this BTR development.

CONCLUSIONS

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with relevant national, regional and local planning policies and guidelines.

The proposed contemporary and attractive architectural design optimises the residential development potential of this central and highly accessible site, whilst at the same time having due regard to the historic setting and character of the area and with regard to existing residential amenities.

We trust the above and enclosed documentation and information provides a reasonable basis sufficient to allow the granting of permission for this Strategic Housing Development.