

**STATEMENT OF CONSISTENCY**

**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**

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## INTRODUCTION

On behalf on the applicant Rhonnellen Developments Ltd., this planning report accompanies this planning application to An Bord Pleanála in accordance with the Planning and Development (Housing) and Residential Tenancies Act (2016) for a proposed Strategic Housing Development (SHD) at 'Templar Place', on the site of the former Mall Shopping Centre, Balbriggan, Co. Dublin.

The proposed development comprises 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)

## NATIONAL AND REGIONAL PLANNING POLICY

The key national and regional policies and guidelines (including Section 28 Guidelines) relevant to the proposed development are as follows:

- *Ireland 2040 Our Plan - National Planning Framework (2018);*
- *Regional Spatial and Economic Strategy 2019- 2031;*
- *Guidelines for Planning Authorities on Urban Development and Building Heights (2018);*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2020);*
- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;*
- *Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;*
- *Quality Housing for Sustainable Communities (2007);*
- *Design Manual for Urban Roads and Streets (2019);*
- *Guidelines for Planning Authorities on Childcare Facilities (2001);*
- *Smarter Travel – A New Transport Policy for Ireland (2009-2020);*
- *The Planning System and Flood Risk Management (2009).*

### PROJECT IRELAND 2040 OUR PLAN - NATIONAL PLANNING FRAMEWORK (2018)

The National Planning Framework (NPF) is the Government's plan to cater for the extra one million people that is anticipated to be living in Ireland within the next 20 years. The Eastern and Midland Region (including Dublin) will, by 2040, be a Region of around 2.85 million people, at least half a million more than today.

The NPF Strategy includes the following planning aims to guide the delivery of this growth:

- Supporting the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city.
- Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas.
- Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.

Overall, the NPF seeks to avoid continued, untrammelled urban sprawl of our cities into greenfield areas. "Compact Urban Growth" is the NPF mantra, "*making better use of under-utilised land and buildings, ... with higher housing and jobs densities, better serviced by existing facilities and public transport.*"

This approach not only makes better use of serviced zoned land but it can also have a "*transformational difference*" to urban locations bringing new life and footfall to areas and contributing to the viability of services, shops and public transport, increasing the housing supply, and enabling more people "*to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less*" (section 2.6).

The NPF enables a flexible approach to planning policies and standards requiring developments to be *“focusing on design led and performance-based outcomes, rather than specifying absolute requirements in all cases... planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes.”*

In particular Section 4.5 highlights that *“general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g., city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.”* It highlights that there *“should also generally be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs of all five.”*

The NPF also states that *“to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas”*. Key National Policy Objectives (NPOs) outlined in the NPF which are directly relevant to this site and development proposal are set out below:

*National Policy Objective 3a*

*Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*

*National Policy Objective 4*

*Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*

*National Policy Objective 6*

*Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

*National Policy Objective 11*

*In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

*National Policy Objective 13*

*In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.*

*National Policy Objective 27*

*Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.*

*National Policy Objective 33*

*Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

*National Policy Objective 35*

*Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

*National Policy Objective 53*

*Support the circular and bio economy including in particular through greater efficiency in land management, greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.*

#### **EVALUATION OF CONSISTENCY**

The subject site is located within Balbriggan town centre. Balbriggan is the second largest town in Fingal and the 17<sup>th</sup> largest town in the country (as per the 2016 Census).

The proposed development seeks to deliver a new residential development in the heart of Balbriggan close to a broad range of services, high quality public transport options and local amenities.

The development will be only c.250m from Balbriggan Train Station and a number of bus services along Bridge Street including the 101, 101x, B1, 191 & 192 offering services to Dublin City, Dublin Airport, Drogheda and locally. At Old Market Green to the southeast of the site are additional Dublin Bus services (Nos. 33, 33a and 33X) which operate between Balbriggan and Dublin City Centre.

Balbriggan has a wide range of schools, shops, medical services, childcare services, leisure facilities, bars, take away and restaurants all within walking distance of the site.

The proposed development will provide for a high-quality residential scheme through the layout, design, materials and finishes proposed. In addition, the proposed units are in accordance with the apartment size requirement as per the Apartment Guidelines.

In summary the proposed development is in accordance with the following aims of the NPF:

- Delivering new homes within the heart of an established and well serviced town on brownfield lands within its existing urban footprint and avoiding urban sprawl.
- Providing for a high quality residential development that will increase the delivery of housing stock and household types within the heart of Balbriggan.
- Redeveloping a significant brownfield site which will rejuvenate a part of Balbriggan town centre in need of regeneration, bringing increased urban population, sustaining demand for services and employment, providing improved streetscape and public realm and overall providing a positive and sustainable redevelopment for the area.

- Encouraging more sustainable trip generation and providing a safe and convenient alternative to the private car.
- Increasing residential density through sustainable design and justifiable increases in building height.

### **REBUILDING IRELAND – ACTION PLAN FOR HOUSING AND HOMELESSNESS 2016**

Rebuilding Ireland was launched in 2016 with the objective to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021. It was based on 5 no pillars. Pillar 3 – Build More Homes aims to increase the output of private housing to meet demand at affordable prices.

#### **EVALUATION OF CONSISTENCY**

The proposed development is consistent with Pillars 2, 3, and 5 which seek to “accelerate the delivery of social housing” which will be achieved through the delivery of Part V social housing units (Pillar 2); it will build more homes (Pillar 3) and improve the rental section (Pillar 4). The proposed development provides for 101 no. new build to rent apartment units. This will improve the quantity and mix of residential stock at a location that is particularly well served in terms of public transport, education, retail, employment, recreation and associated social infrastructure.

### **REGIONAL SPATIAL AND ECONOMIC STRATEGY 2019-2031**

Under the Local Government Reform Act 2014 the Regional Planning Framework has been revised with the previous Regional Authorities/Assemblies (ten in total) now replaced with three Regional Assemblies.

The Regional Authorities for the Greater Dublin Area – The Dublin Region and the Mid-East Region - have been replaced by the Eastern and Midland Regional Assembly. The region covers nine counties, Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, and Dublin.

The Regional Spatial and Economic Strategy for the Eastern and Midland Region was adopted in 2019 and is a strategic plan and investment framework to shape the future development of this region to 2031.

The vision for the region is to *“create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.”*

The RSES will support the implementation of Project Ireland 2040 – the National Planning Framework (NPF) and National Development Plan (NDP). It addresses employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development and climate change. The vision for the RSES is to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.

The RSES also sets out 16 Regional Spatial Objectives which align with the 3 key principles of the RSES and have been developed to ensure that positive strategic environmental outcomes occur. Ten of which, the most relevant to this site, are set out below.

**1. Sustainable Settlement Patterns**

Better manage the sustainable and compact growth of Dublin as a city of international scale and develop Athlone, Dundalk, Drogheda and a number of key complementary growth settlements of sufficient scale to be drivers of regional growth. (NSO 1, 7, 10)

**2. Compact Growth and Urban Regeneration**

Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens. (NSO 1)

**9. Support the Transition to Low Carbon and Clean Energy**

Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050. (NSO 8, 9)

**10. Enhanced Green Infrastructure**

Identify, protect and enhance Green Infrastructure and ecosystem services in the Region and promote the sustainable management of strategic natural assets such as our coastlines, farmlands, peatlands, uplands woodlands and wetlands. (NSO 8, 9)

**11. Biodiversity and Natural Heritage**

Promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection. (NSO 7, 8)

**4. Healthy Communities**

Protect and enhance the quality of our built and natural environment to support active lifestyles including walking and cycling, ensure clean air and water for all and quality healthcare and services that support human health. (NSO 10)

**5. Creative Places**

Enhance, integrate and protect our arts, culture and heritage assets to promote creative places and heritage led regeneration. (NSO 5, 7)

**6. Integrated Transport and Land Use**

Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning. (NSO 2, 6, 8, 9)

**7. Sustainable Management of Water, Waste and other Environmental Resources**

Conserve and enhance our water resources to ensure clean water supply, adequate waste water treatment and greater resource efficiency to realise the benefits of the circular economy. (NSO 8, 9)

**8. Build Climate Resilience**

Ensure the long-term management of flood risk and build resilience to increased risks of extreme weather events, changes in sea level and patterns of coastal erosion to protect property, critical infrastructure and food security in the Region. (NSO 8, 9)

Balbriggan is located within the Core Region adjoining the Dublin Metropolitan Area and the town is identified in the RSES as having the *"capacity for continued commensurate growth to become more self-sustaining and to attract high quality knowledge based employment."*

The following Growth Enablers for the Core Region are also noted with relevance to the current proposal:

- *To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns to become more self-sustaining and to create the quality of life to attract investment.*
- *Commensurate population and employment growth in Key towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least 30% of all new homes to be within the existing built up area of settlements.*



- ‘Catch up’ investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents.

Balbriggan is identified as a Self-Sustaining Town for “contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery.”

Population growth in Balbriggan is to be promoted “at a rate that seeks to achieve a balancing effect and shall be focused on consolidation and inclusion of policies in relation to improvements in services and employment provision, to be set out in the core strategies of county development plans.”

Balbriggan is also identified with a number of towns for the preparation of Local Transport Plans to ensure proper integration of land use and transport planning going forward and the achievement of the NPF’s objective of ‘compact smart growth’.

In relation to Heritage the RSES acknowledge the historic planned towns within the region including Balbriggan and promote the sustainable re-use of heritage assets and provision of high quality public realm to promote urban living and make the town more attractive. The RSES recommend a balancing of the protection of the built heritage and the sustainable development of historic urban areas with the needs of modern living.

#### EVALUATION OF CONSISTENCY

The proposed development is in accordance with the main objectives of the RSES for this important Core Region settlement.

The proposed residential development on a brownfield site within the town centre of Balbriggan will ensure containment of future population growth within the heart of the town providing urban consolidation and compact urban growth and a new community provided close to services and amenities rather than at peripheral locations that require additional infrastructure.

The proposed development will be an exemplar of ‘compact smart growth’ and properly integrated land use and transport planning where future residents will have practically all services and amenities within walking distance and the need for private car use will be significantly diminished and local public transport use will be optimised.

In relation to heritage, whilst the site does not contain any protected structures it is located adjacent to a number and is also located within an ACA. These final design has been achieved through a multi-disciplinary approach with Molloy & Associates, Conservation Architects working closely with MDO Architects, CSR Landscape Architects and D3D Geomatics, from the outset to arrive at a design proposal which provides for the appropriate redevelopment and densification of this key town centre brownfield site to provide a contemporary residential scheme, but with due regard to its setting within an ACA and visual presence within the Harbour Area.

## URBAN DEVELOPMENT & BUILDING HEIGHTS: GUIDELINES FOR PLANNING AUTHORITIES, 2018

The Guidelines set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework (NPF) and Project Ireland 2040.

**There is now a presumption in favour of increased building height in appropriate urban locations with good public transport services.**

Under Section 28 (1C) of the Planning and Development Act 2000 (as amended), Planning Authorities and An Bord Pleanála are required to have regard to the guidelines and apply any specific planning policy requirements (SPPR's) of the guidelines in carrying out their function.

Sections 1.13 and 1.14 state:

*“These guidelines are issued by the Minister for Housing, Planning and Local Government under Section 28 of the Planning and Development Act 2000 (as amended). Planning Authorities and An Bord Pleanála are required to have regard to the guidelines and apply any specific planning policy requirements (SPPRs) of the guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended), in carrying out their functions.*

*Accordingly, where SPPRs are stated in this document, they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes. Where such conflicts arise, such plans/ schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements.”*

The Guidelines incorporate the principles of the NPF, in particular to need to increase levels of residential development in urban centres and increase building heights and overall density. It identifies the need to focus planning policy on “reusing previously developed “brownfield” land, building up urban infill sites”.

They place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks.

*“In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors”.*

It goes on to highlight that “the preparation of development plans, local areas plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights”.

The following summarises the compliance of the proposed development with the Development Management Principles and Criteria for assessing increased building height outlined in Sections 3.1 and 3.2 of the Guidelines:

POLICY	EVALUATION OF CONSISTENCY
<p><i>Section 3.1 Development Management Principles</i></p> <p><i>In relation to the assessment of individual planning applications and appeals, it is <u>Government policy that building heights must be generally increased in appropriate urban locations</u>. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility. Planning authorities <u>must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas</u> in pursuit of these guidelines:</i></p> <ul style="list-style-type: none"> <li><i>Does the proposal positively assist in securing National Planning Framework objectives of focusing development on key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?</i></li> <li><i>Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?</i></li> <li><i>Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?</i></li> </ul>	<p>The proposed development seeks to deliver a new residential development at a town centre site that is highly accessible in terms of public transport with Balbriggan train station within c.250m. The development will also benefit from the existing public bus services that operate through the town centre and connect to Dublin City Centre, Dublin airport and Drogheda. There is also excellent pedestrian links from the site to the rest of the town centre services and the Harbour.</p> <p>The site is zoned Major Town Centre, where higher plot ratios, coverages and densities are expected.</p> <p>The Fingal County Development Plan does not have a specific Building Heights Strategy for the county or individual areas/sites (notwithstanding LAPs). However, the Development Plan was varied on 29<sup>th</sup> June 2020 to align with national policy.</p> <p>Policy Objective PM42 of the Development Plan now states:</p> <p><i>“Implement the policies and objectives of the Minister in respect of ‘Urban Development and Building Heights Guidelines’ (December 2018) and Sustainable Urban Housing: Design Standards for New Apartments (March 2018) issued under section 28 of the Planning and Development Act, as amended.”</i></p> <p>Furthermore, the development will achieve the following principles of the Building Heights Guidelines which provide the justification for taller buildings:</p> <ul style="list-style-type: none"> <li>The proposed development secures the NPF objective of compact urban growth within the town centre of a</li> </ul>

	<p>key settlement in Fingal, on the Dublin-Belfast Economic Corridor, and within the Core Region of the Eastern and Midlands Regional Area.</p> <ul style="list-style-type: none"> <li>• The proposed development will secure the redevelopment of a key brownfield site in Balbriggan town centre, delivering new homes within the heart of an established and well serviced town.</li> <li>• The development accords with National Policy Objective (NPO) 33 in delivering an appropriate scale of sustainable residential development at a highly accessible location.</li> <li>• The development accords with NPO 35 in achieving higher density through increased building height of up to 7 storeys in height.</li> <li>• The development accords with NPO 13 in terms of increasing building height and reducing car parking to provide a high quality and high amenity residential development that at the same time achieves increased compact growth at an accessible and designated town centre location.</li> </ul>
<p><i>Section 3.2 Development Management Criteria</i></p> <p><i>In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria:</i></p>	<p>The site is well connected with public transport services. Balbriggan train station is located c.250m north of the site with frequent services on the Northern Commuter Line between Dublin City Centre and Dundalk. Under the Dart+ Programme it is also intended that rail services will be electrified along the Northern Line as far as Drogheda which will mean increased services for Balbriggan in the future.</p>
<p><i>At the scale of relevant city/town:</i></p> <p><i>-The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</i></p>	<p>In addition, the town is served by a number of bus services including the 33, 33a, 33X, 101, 101x, B1, 191 &amp; 192 offering services to Dublin City, Dublin Airport, Drogheda and locally.</p>

*At the scale of district/ neighbourhood/ street;*

- *The proposal responds to its overall natural and built environment and makes a positive contribution.*
- *The proposal is not monolithic and avoids long, uninterrupted walls of building.*
- *The proposal enhances the urban design context for public spaces and key thoroughfares.*
- *The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies.*

The existing site, which is vacant, was formerly a small shopping centre which has been closed for some time with Balbriggan now served by a number of alternative retail locations within the town centre and at the edge of centre – including the Millfield Shopping Centre.

The proposed development introduces a new apartment development in the heart of the town centre close to public transport and services helping to sustain a town centre residential community into the future .

The proposed development responds very positively to its town centre context and located within the Balbriggan Historic Centre ACA by addressing High Street and Quay Street, providing a much improved streetscape and public realm.

#### 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

	<p>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.</p> <p>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.</p> <p>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.</p> <p><u>Impact on High Street</u></p> <p>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.</p> <p>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.</p> <p>Respectful distances have been maintained adjacent the boundaries to avoid</p>
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	<p>encroachment on the adjacent single-storey structures.</p> <p>The simple material palette has been selected to harmonise with the brick of the residences and the library on High Street.</p> <p>It is considered that the existing boundary walls are not of sufficient architectural interest to warrant their retention. The proposed elevation on High Street constitutes a well-considered scheme that positively contributes to the Balbriggan Historic Centre ACA.</p>
<p><i>At the scale of the site/building:</i></p> <p><i>- Maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</i></p>	<p>Over 50% of the apartments across the scheme are dual aspect which is in excess of the minimum standard required for developments under the Apartment Guidelines (which requires at least 33% dual aspect in intermediate locations within town centres).</p> <p>The communal amenity space will be compliant with the guidelines with 84% achieving at least two hours of sunlight over 50%+ on 21st March.</p> <p>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 standards of &gt; 1.5% for Living/ Dining Areas, and &gt; 1.0% for Bedrooms. 50% of the living spaces achieved an ADF in excess of 3%, and over 85% achieved 2.0%. This is a very high result for a brownfield town centre site.</p> <p>In terms of impact on 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.</p>



<p><i>Specific Assessments:</i></p> <ul style="list-style-type: none"> <li><i>-Specific impact assessment of the micro-climatic effects such measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.</i></li> <li><i>-Development locations in proximity to sensitive bird/bat areas need to consider the potential interaction of the building location, materials and artificial lighting.</i></li> <li><i>-Relevant environmental assessment requirements.</i></li> </ul>	<p>Having regard to the town centre context of the site and adjoining building heights and street layouts, a wind study has been prepared.</p> <p>The analysis determined 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".</p> <p>The site is a brownfield site with no extant ecology or habitats of sensitivity. Nevertheless an Ecological Impact Assessment has been carried out as well as a separate bat survey.</p> <p>The bat report concluded that there are low levels of bat activity in the area. No bats were found to be roosting within the buildings.</p> <p>Mitigations measures recommended in the Ecological Impact Assessment and the Bat Survey are incorporated into the Construction &amp; Environmental Management Plan prepared by ORS Consulting Engineers and the Public Lighting Plan and Report prepared by Varming Consulting Engineers.</p> <p>An Appropriate Assessment Screening has also been carried out. In accordance with Article 6(3) of the Habitats Directive, the relevant case law, established best practice and the precautionary principle, this AA Screening Report has examined the details of the project in relation to the relevant Natura 2000 sites within 15km of the application site. This report has analysed the potential impacts and effects of the proposed project on the Special Conservation Interests of these designated sites. It has evaluated the significance of these potential impacts and</p>
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	<p>effects in view of these sites' conservation objectives.</p> <p>There are no watercourses on the site, therefore there are no source-pathway-receptor linkages between the application site and the European sites and significant effects arising from pollution during construction or operation can be ruled out.</p> <p>In view of best scientific knowledge and on the basis of objective information, it can be concluded that this application, whether individually or in combination with other plans and projects, will have no impacts upon the Natura 2000 sites. It is of the opinion of this author that this application does not need to proceed to Stage II of the Appropriate Assessment process.</p>
<p><b>SPPR 3</b></p> <p><i>It is a specific planning policy requirement that where; 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan, local area plan or planning scheme may indicate otherwise.</i></p>	<p>This proposal is considered in accordance with the NPF and associated Section 28 Guidelines, in terms of optimising the residential yield on this appropriately zoned, serviced and highly accessible brownfield site located within Balbriggan Town Centre and within short walking distance of a range of public transport options, retail and all necessary social infrastructure to serve this future residential community.</p>

#### **EVALUATION OF CONSISTENCY**

Having regard to the response to each element of the Development Management Criteria outlined above, it is evident that the proposed development is in accordance with the policies and objectives of the *Building Height Guidelines* and is suitable for the building height range proposed at this central, highly accessible, brownfield site.

#### **GUIDELINES FOR PLANNING AUTHORITIES ON SUSTAINABLE RESIDENTIAL DEVELOPMENT IN URBAN AREAS, 2009**

The guidelines set out the key planning principles to be reflected in development plans and local area plans, to guide the preparation and assessment of planning applications for residential development in urban areas.

The Guidelines elaborate a range of high-level aims for successful and sustainable residential development in urban areas. These are assessed against the proposed scheme as follows:

	<b>EVALUATION OF CONSISTENCY</b>
<i>Prioritise walking, cycling and public transport, and minimise the need to use cars;</i>	<p>The application site is within Balbriggan Town Centre and within 250m of Balbriggan train station and a number of bus stops which provide regular services to Dublin City Centre, and other towns and suburban centres.</p> <p>There is a well-established footpath network within the town centre which will benefit the scheme. In order to promote a low car environment, this BTR development proposes a parking ratio of c.0.25 spaces per unit and is accompanied by a Mobility Management Plan prepared by ORS Consulting Engineers.</p>
<i>Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;</i>	<p>The scheme has been designed in accordance with all relevant quantitative and qualitative residential standards as set down in the national apartment guidelines and the Fingal County Development Plan.</p> <p>Future residents will live in a uniquely central and safe residential environment with a high quality communal open space that is free of cars. The proposed development will be easily accessible to employment, social infrastructure, open spaces and public transport in the area.</p>
<i>Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;</i>	<p>The development will consist of apartments with residential facilities and two retail units. In addition, given the location within the town centre the development will have direct access to a broad range of services and amenities for future residents.</p>
<i>Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;</i>	<p>The layout of development has been designed to enhance the streetscape along Quay Street and High Street and provide an attractive and well considered architecture respectful of its ACA location and which will improve the character of the area and sense of place.</p>
<i>Are easy to access for all and to find one's way around;</i>	<p>This infill scheme will complete and improve the existing streets providing a new and attractive urban edge which along with the scale proposed will improve urban legibility within Balbriggan town centre.</p>
<i>Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;</i>	<p>The proposal seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity and</p>

	minimise impacts of climate change in accordance with current buildings regulations.
<i>Provide a mix of land uses to minimise transport demand;</i>	The site is zoned for town centre uses of which residential and retail are permitted in principle uses. The predominantly residential development will improve the overall mix of uses in Balbriggan town centre allowing future residents to be located adjacent to services and facilities that they require thus reducing the need to travel particularly by private car.
<i>Promote social integration and provide accommodation for a diverse range of household types and age groups;</i>	This proposal is for a build to rent development of 1 and 2 bedroom apartments. This complements the range of tenure types in the area as well as providing flexible apartments spaces which provide accommodation for a range of household types and age groups.
<i>Enhance and protect the green infrastructure and biodiversity; and</i>	The site comprises a vacant and derelict brownfield site that is considered a visual eyesore within the town centre at present. The proposal will result in a significant improvement in the green infrastructure of the site and will allow new planting and landscaping to be introduced to the development.
<i>Enhance and protect the built and natural heritage.</i>	<p>The proposed development does not have any protected structures on the site but is adjacent to a number of protected structures and is also located within the Balbriggan Historic Centre ACA which the site is also part of.</p> <p>The height and scale of the proposed development is considered appropriate for this urban site and will improve the overall quality of the streetscapes. The submitted design is contemporary in character but also contextual and sensitive to the heritage context.</p>

### URBAN DESIGN MANUAL – A BEST PRACTICE GUIDE, 2009

The Urban Design Manual is the accompanying document to the Sustainable Residential Development in Urban Areas document which provides policy guidance for the creation of successful neighbourhoods having regard to the 12 point criteria. The proposal complies with the following design criteria:

<b>1. Context –How does the development respond to its surroundings?</b>	
	<b>EVALUATION OF CONSISTENCY</b>
<i>The development seems to have evolved naturally as part of its surroundings.</i>	<p>The site is located within a central, brownfield infill site that is distinct from adjoining properties and has fallen into disuse and has become a negative visual element in Balbriggan town centre.</p> <p>The proposed redevelopment of this infill site will have a significant impact on the character of the site and the</p>

	Balbriggan Historic Centre ACA. The scheme presents an opportunity to repair the urban fabric that is visually marred by the 1980's shopping centre. The historic core of Balbriggan comprises a rich and diverse range of building types and form. This contemporary architectural design is intended to positively contribute to the town centre whilst respecting the historic urban grain and complementing the materiality of the existing built fabric.
<i>Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users.</i>	The proposed development reflects national policy which promotes consolidated urban development and higher densities and scale on central, accessible and well serviced urban sites.
<i>Form, architecture and landscaping have been informed by the development's place and time.</i>	<p>The height and scale of the proposed development is considered appropriate for this urban site. Presently the site is underutilised and its redevelopment will naturally alter the existing views.</p> <p>The views depicted in the verified CGIs submitted with this application show that the proposed development will not be visible from many locations within the town centre. At views from adjoining streets and the harbour, a distinct, contemporary building larger in scale relative to the existing buildings on the site will be apparent, and which will alter the present setting, but this is not adverse in terms of the character of the ACA.</p> <p>The proposal will deliver improved street frontages to the benefit of the urban realm and constitute a positive redevelopment of a disused building with a derelict appearance. In broad terms, the proposal balances the sensitivities of the ACA and can be successfully absorbed into the distant views of the town.</p>
<i>The development positively contributes to the character and identity of the neighbourhood.</i>	<p>The proposal is a striking design and layout which will enhance and improve the character of the Balbriggan Historic Centre ACA and complement recent developments and permissions in the area.</p> <p>It will remove a vacant, underutilised site and transform it with a development that will contribute positively to the neighbourhood in terms of increased population and wider, more sustainable residential mix.</p>
<i>Appropriate responses are made to the nature of specific boundary conditions.</i>	The development has been designed with regard to the existing boundary features and unique

	topography, with the development set back appropriately from adjoining properties.
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## **2. Connections – How well connected is the new development**

	<b>EVALUATION OF CONSISTENCY</b>
<i>There are attractive routes in and out for pedestrians and cyclists.</i>	The site will be accessible directly to future residents off Quay Street and Bridge Street with dedicated cycle parking areas provided. Cars will be discretely brought to ground floor car park from Quay Street entrance.
<i>The development is located in or close to a mixed-use centre.</i>	The scheme will be located within Balbriggan Town Centre with a range of employment, community uses, retail, restaurants, and entertainment facilities within walking distance.
<i>The development's layout makes it easy for a bus to serve the scheme.</i>	The site is within 250m of Balbriggan train station and several bus stops.
<i>The layout links to existing movement routes and the places people will want to get to.</i>	Dedicated and safe pedestrian/cyclist permeability from the development is provided in the specific design and layout proposed.
<i>Appropriate density, dependent on location, helps support efficient public transport.</i>	The density accords with national guidelines which promote higher density development in town and city centre areas close to high quality public transport and local services. The lower levels of private car parking within this BTR scheme also enables this development to support the efficient use and maximise the sustainable use of public transport.

## **3. Inclusivity – How easily can people use and access the development?**

	<b>EVALUATION OF CONSISTENCY</b>
<i>New homes meet the aspirations of a range of people and households.</i>	The proposed BTR scheme will overall improve the mix of 1 and 2 bed units within Balbriggan Town Centre and will facilitate a wider range of homeowners including individuals, couples, small families and empty nesters.
<i>Design and layout enable easy access by all.</i>	The proposal has been designed for ease of access throughout the site in accordance with Part M of the building regulations.
<i>There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly.</i>	The scheme will provide a central communal open space which will provide a range of recreational uses. In addition, the development will be accessible to a number of existing public spaces including Quay Street Park and Balbriggan Harbour and beach.
<i>Areas defined as public open space that have either been taken in charge or privately managed will be clearly defined, accessible and open to all.</i>	The open spaces are all clearly defined and comprehensively designed.

<i>New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers.</i>	The redevelopment will improve the overall quality of the streetscapes and make Bridge Street and Quay Street more attractive locations to traverse.
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<b>4. Variety – How does the development promote a good mix of activities?</b>	
	<b>EVALUATION OF CONSISTENCY</b>
<i>Activities generated by the development contribute to the quality of life in its locality.</i>	The proposal will provide for a sustainable quantity of residential development (with retail) in a town centre location close to existing services and amenities. The future population will increase demand and sustain existing services in the town and the design will improve the visual qualities and character of the area.
<i>Uses that attract the most people are in the most accessible places.</i>	In addition to the residential use and residential amenities, two shops are proposed along Quay Street which will be easily accessible to customers and will improve the mix of uses along the street.
<i>Neighbouring uses and activities are compatible with each other.</i>	The residential development is compatible with the existing uses along Quay Street and Bridge Street.
<i>Housing types and tenure add to the choice available in the area.</i>	A variety of apartments are provided which will further improve the range of unit types in the area available to various household types. Please refer to the accommodation schedule for more information.
<i>Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.</i>	The scheme includes two retail units along Quay Street. Otherwise, the town centre is well provided for in terms of retail provision and the future residential community will create additional demand for such services.

<b>5. Efficiency - How does the development make appropriate use of resources, including land?</b>	
	<b>EVALUATION OF CONSISTENCY</b>
<i>The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design.</i>	The overall density is considered appropriate for this site given the town centre location, proximate to public transport and social infrastructure.
<i>Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems.</i>	The central courtyard open space will be appropriately planted, will contain SUDs measures and will provide for the amenity of future residents.
<i>Buildings, gardens and public spaces are laid out to exploit the best solar orientation.</i>	Over 50% of the apartments across the scheme are dual aspect which is in excess of the minimum standard required under the 2020 Apartment Guidelines. All units and open spaces will enjoy sufficient sunlight and daylight provision. This is further demonstrated by the Daylight and Sunlight Study by IN2.
<i>The scheme brings a redundant building or derelict site back into productive use.</i>	The site is currently made up of derelict buildings. This scheme will bring this site back into a productive



	use. However, the existing buildings cannot be re-used.
<i>Appropriate recycling facilities are provided.</i>	Communal recycling facilities are provided in the bin stores located within the development.

<b>6. Distinctiveness - How do the proposals create a sense of place?</b>	
	<b>EVALUATION OF CONSISTENCY</b>
<i>The place has recognisable features so that people can describe where they live and form an emotional attachment to the place.</i>	The development will have public frontages onto High Street and Quay Street and a clear sense of place will be provided for the residents of each block.
<i>The scheme is a positive addition to the identity of the locality.</i>	The site is currently vacant with derelict buildings. The proposal will provide an appropriate scale and quantum of residential development on a key site within Balbriggan town centre and which will further improve the character and identity of same.
<i>The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout.</i>	The proposed layout adapts to the unique topography on site, providing a multi-level development with its own unique internal character but also integrative with the existing streets externally, providing a memorable and attractive layout and place to live.
<i>The proposal successfully exploits views into and out of the site.</i>	The buildings are laid out facing onto each of the public streets which will allow completion/improvement to existing streetscape and public realm. The central courtyard will be overlooked by the three blocks.
<i>There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre.</i>	The central courtyard is the obvious focal point for the development which residents from both blocks will utilise.

<b>7. Layout - How does the proposal create people friendly streets and spaces?</b>	
	<b>EVALUATION OF CONSISTENCY</b>
<i>Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.</i>	There is no discernible desire line through the site but rather the development seeks to improve on the existing streets and public realm, in particular Quay Street, making it a more attractive connection from the town centre down to the harbour and the beach.
<i>The layout focuses activity on the streets by creating frontages with front doors directly serving the street.</i>	The apartment scheme provides frontages that contributes to passive surveillance of the streets and the new courtyard open space within the scheme.
<i>The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.</i>	Car parking spaces are provided at ground level behind the apartment block and will a single, level vehicular access from Quay Street (utilising an existing service access). Above the car park the

<i>Traffic speeds are controlled by design and layout rather than by speed humps.</i>	communal open space will be located ensuring a car free environment for residents.
<i>Block layout places some public spaces in front of building lines as squares or greens, and some semi-private space to the back as communal court.</i>	The development seeks to improve the streetscapes of Quay Street and Bridge Street providing new/improved building frontage and architecture. Within the scheme between the three blocks, a clearly defined and safe communal courtyard is provided.

<b>8. Public Realm - How safe, secure and enjoyable are the public areas?</b>	
	<b>EVALUATION OF CONSISTENCY</b>
<i>All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.</i>	All spaces are overlooked and supervised by the apartment blocks.
<i>The public realm is considered as a usable integrated element in the design of the development.</i>	Creation of a car free public realm for pedestrians and cyclists to traverse unhindered is a key design outcome and will create a unique residential development in this part of the Dublin. The landscaping and design of the public realm can be solely dedicated to providing the optimum amenity for residents.
<i>Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood.</i>	A play area is facilitated within the communal courtyard.
<i>There is a clear definition between public, semi-private, and private space.</i>	Private open space is provided for each unit and is clearly defined from the communal open space.
<i>Roads and parking areas are considered as an integral landscaped element in the design of the public realm.</i>	The car parking area and communal open space are segregated ensuring a safe environment for residents.

<b>9. Adaptability - How will the buildings cope with change?</b>	
	<b>EVALUATION OF CONSISTENCY</b>
Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.	N/A. This is an apartment development.
The homes are energy-efficient and equipped for challenges anticipates from a changing climate.	Yes, design practices and proposed materials will militate against the effects of climate change.
Homes can be extended without ruining the character of the types, layout and outdoor space.	N/A
The structure of the home and its loose fit design allows for adaptation and subdivision, such as the creation of an annex or small office.	N/A
Space in the roof or garage can be easily converted into living accommodation.	N/A



<b>10. Privacy and Amenity - How does the scheme provide a decent standard of amenity?</b>	
	<b>EVALUATION OF CONSISTENCY</b>
Each home has access to an area of useable private outdoor space.	Yes, each unit has its own private open space in accordance with the minimum residential standards as per the national apartment guidelines.
The design maximises the number of homes enjoying dual aspect.	Over half of the apartments are area dual aspect which accord with the 2020 Apartment Guidelines.
Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout.	All units will be designed to prevent sound transmission in accordance with building regulations.
Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units.	Adequate separation distance between opposing windows is achieved and overlooking is not considered an issue of the development particularly in relation to adjoining existing buildings.
<i>The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables.</i>	All apartments are designed in accordance with national design standards on storage areas.

<b>11. Parking – How will the parking be secure and attractive?</b>	
	<b>EVALUATION OF CONSISTENCY</b>
<i>Appropriate car parking is on-street or within easy reach of the home's front door.</i>	There is no on street parking, all of the parking is within the ground level parking area underneath the podium communal open space. This is a highly accessible location so the demand for car storage is significantly reduced in locations such as these. This is in line with current NPF policy. Please see the Traffic and Transport Assessment for further details.
<i>Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation.</i>	All of the parking is within a secure ground level car park located below the communal open space.
<i>Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.</i>	Car parking is in a communal car park located below the communal open space.
<i>Materials used for parking areas are of similar quality to the rest of the development.</i>	Yes, the highest quality materials will be used throughout the scheme.
<i>Adequate secure facilities are provided for bicycle storage.</i>	Dedicated bicycle parking is provided throughout the scheme in line with the Design Standards for New Apartments and cycle standards.

<b>12. Detailed Design – How well thought through is the building and landscape design?</b>	
	<b>EVALUATION OF CONSISTENCY</b>
<i>The materials and external design make a positive contribution to the locality.</i>	The elevation strategy, including materials, has been developed with the following factors in mind: <ul style="list-style-type: none"> <li>- Provide strong architectural forms that are complementary to the Balbriggan Historic Centre ACA and the existing character of the town centre.</li> <li>- Break down the overall massing and reflect urban grain.</li> <li>- Provide a controlled palette of materials and colours to provide verticality and visual interest.</li> </ul>
<i>The landscape design facilitates the use of the public spaces from the outset.</i>	The courtyard open space will be provided in tandem with completion of the apartment blocks.
<i>Design of the buildings and public space will facilitate easy and regular maintenance.</i>	This can be achieved and will be provided by the estate management company as set out in the Building Life Cycle Report.
<i>Open car parking areas are considered as an integral element within the public realm design and are treated accordingly.</i>	Parking is at ground level underneath the communal open space at podium.
<i>Care has been taken over the siting of flues, vents and bin stores.</i>	Bin stores are located discretely in car park. All vents opening above are discretely located and carefully landscaped.

## **QUALITY HOUSING FOR SUSTAINABLE COMMUNITIES: BEST PRACTICE GUIDELINES FOR SUSTAINABLE COMMUNITIES, 2007**

The Department's policy statement Delivering Homes, Sustaining Communities, Guidance provides the overarching policy framework for an integrated approach to housing and planning. Sustainable neighbourhoods are areas where an efficient use of land, high quality design, and effective integration in the provision of physical and social infrastructure combine to create places people want to live in. The policy statement is accompanied by Best Practice Guidelines that promotes quality sustainable residential development in urban areas having regard to the following:

- *promote high standards in the design and construction and in the provision of residential amenity and services in new housing schemes;*
- *encourage best use of building land and optimal of services and infrastructure in the provision of new housing;*
- *point the way to cost effective options for housing design that go beyond minimum codes and standards;*
- *promote higher standards of environmental performance and durability in housing construction;*
- *seek to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and*
- *provide homes and communities that may be easily managed and maintained.*

The following criteria indicate the 7 no. essential requirements new residential developments should have regard to when carrying out development:

	<b>EVALUATION OF CONSISTENCY</b>
<p><u>Socially &amp; Environmentally Appropriate</u>  <i>"The type of accommodation, support services and amenities provided should be appropriate to the needs of the people to be accommodated. The mix of dwelling type, size and tenure should support sound social, environmental and economic sustainability policy objectives for the area and promote the development of appropriately integrated play and recreation spaces."</i></p>	<p>The scheme will provide an appropriate mix of studio, 1, and 2 bedroom apartments considered appropriate for this town centre location. A variety of household types will be facilitated including singles, couples, small families and empty nesters.</p> <p>The development includes the provision of play facilities which will attract small families whilst all household types noted above will be attracted to the central location and proximity to town centre services, amenities, open spaces and public transport.</p>
<p><u>Architecturally Appropriate</u>  <i>"The scheme should provide a pleasant living environment, which is aesthetically pleasing and human in scale. The scheme design solution should understand and respond appropriately to its context so that the development will enhance the neighbourhood and respect its cultural heritage."</i></p>	<p>The design and layout of the scheme creates a liveable and visually pleasing environment for residents.</p> <p>The design is appropriate and mindful of the town centre context, the site constraints, and architectural character of the adjoining areas including future permitted developments.</p>
<p><u>Accessible &amp; Adaptable</u>  <i>"There should be ease of access and circulation for all residents, including people with impaired mobility, enabling them to move as freely as possible within and through the development, to gain access to buildings and to use the services and amenities provided. Dwellings should be capable of adaptation to meet changing needs of residents during the course of their lifetime."</i></p>	<p>This scheme is accessible for all due to the provision of lifts within the scheme. The landscaping also is clearly laid within the centre of the scheme ensuring people can navigate easily.</p> <p>This scheme limits the access of vehicles in the scheme creating a safe, pedestrian dominated development.</p>
<p><u>Safe, Secure &amp; Healthy</u>  <i>"The scheme should be a safe and healthy place in which to live. It should be possible for pedestrians and cyclists to move within and through the area with reasonable ease and in safety. Provision for vehicular circulation, including access for service vehicles, should not compromise these objectives."</i></p>	<p>The scheme provides full segregation of vehicle and pedestrians/cyclists with the surface of the site free from cars.</p> <p>A very safe walking and cycling environment will be provided for residents with a network of paths located around the development.</p>
<p><u>Affordable</u>  <i>"The scheme should be capable of being built, managed and maintained at reasonable cost, having regard to the nature of the development."</i></p>	<p>Streets and open spaces shall be overlooked as far as practicable to achieve maximum passive surveillance.</p>
<p><u>Durable</u></p>	<p>The scheme endeavours to use the best available materials and construction techniques in order to</p>

<i>"The best available construction techniques should be used, and key elements of construction should have a service life in the order of sixty years without the need for abnormal repair or replacement works."</i>	minimise the level of refurbishment over the lifetime of the scheme.
<b>Resource Efficient</b> <i>"Efficient use should be made of land, infrastructure and energy. The location should be convenient to transport, services and amenities. Design and orientation of dwellings should take account of site topography so as to control negative wind effects and minimise the benefits of sunlight, daylight and solar gain; optimum use should be made of renewable sources of energy, the use of scarce natural resources in the construction, maintenance and management of the dwellings should be minimised."</i>	The scheme is considered to accord with the aforementioned sustainable development principles.

### SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS, 2020

The Apartment Guidelines 2020 promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term. The guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.

In relation to appropriate locations for apartment developments and increased density the Guidelines identify 3 urban location types. *"Intermediate Urban Locations"* are identified as those suitable for *"smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments"*. Such sites was within reasonable walking distance (up to 1,000m) of a town centre, high capacity public transport stop (1.5km) , and reasonably frequent urban bus services (500m).

<p>The subject site represents an "Intermediate Urban Location" in this regard as it meets the following criteria</p> <ul style="list-style-type: none"> <li>• It is a site located <u>within</u> Balbriggan town centre.</li> <li>• The site is within 250m of Balbriggan train station with regular services to Dublin City Centre, Drogheda, Dundalk and other stops along the Northern Commuter Line.</li> <li>• The site is within 250m of a number of bus services which serve Balbriggan including the 33, 33a, 33X, 101, 101x, B1, 191 &amp; 192 offering services to Dublin City, Dublin Airport, Drogheda and locally.</li> </ul>
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The Guidelines outline a number of Specific Planning Policy Requirements (SPPRs) which are design standards that apartment developments nationally are expected to adhere to. The following SPPR policies are applicable to Build to Rent developments:

SPPR 3	EVALUATION OF CONSISTENCY
<p>Minimum apartment floor areas: studio apartments (1 person) 37sqm 1 bedroom apartment (2 persons) 45sqm</p>	<p>The current proposal achieves these standards as set out in the Housing Quality Assessment.</p>

2 bedroom apartment (4 persons) 73sqm 3 bedroom apartment (5 persons) 90sqm	
<b>SPPR 4</b>	<b>EVALUATION OF CONSISTENCY</b>
<i>In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following apply</i>  <i>ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme</i>	<p>The current proposal proposes 50% dual aspect which accords with the requirement for Intermediate Urban Locations. It is also noted that Section 3.17 of the Guidelines state that 33% dual aspect provision is acceptable in some Intermediate Locations such as a town centre site, such as this location.</p> <p>It is noted that of the single aspect units, none of them are north facing.</p>
<b>SPPR 5</b>	<b>EVALUATION OF CONSISTENCY</b>
<i>Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality</i>	<p>The proposed building achieves this standard within each block.</p>
<b>SPPR 7</b>	<b>EVALUATION OF CONSISTENCY</b>
<i>BTR development must be:</i> <i>Described in the public notices associated with a planning application specifically as a 'Build-To-Rent' housing development that unambiguously categorises the project (or part of thereof) as a long-term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such. Such conditions include a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period;</i> <i>Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:</i>	<p>The current proposal is for a Build to Rent apartment development for long term rental and will be clearly identified as such in the statutory planning notices to accompany the planning application.</p> <p>The applicant accepts that conditions will be added in the granting of permission requiring the development to remain owned and operated by an institutional entity for at least 15 years and that no individual residential units are sold or rented separately for that period.</p> <p>The BTR proposal includes residential support facilities and amenities equating totalling 217 sq.m. This equates to 2.15 sqm per unit which is considered a generous provision for a town centre BTR scheme that will also be accessible to the broadest range of services and amenities available in the Balbriggan.</p> <p>All residential units will have their own washing machine and internal waste facilities, while there</p>



<p><i>(i) Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.</i></p> <p><i>(ii) Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.</i></p>	<p>is also a waste storage in the ground floor car park area. There is also an onsite management office to assist residents of the development.</p>
<p><b>SPPR 8</b></p>	<p><b>EVALUATION OF CONSISTENCY</b></p>
<p><i>For proposals that qualify as specific BTR development in accordance with SPPR 7:</i></p> <p><i>(i) No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;</i></p> <p><i>(ii) Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;</i></p> <p><i>(iii) 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</i></p>	<p><i>(i) The development proposes 19% studio, 41% 1-bed, and 41% 2-bed. Units.</i></p> <p><i>(ii) Notwithstanding that it is a BTR scheme all units are provided with private open space and storage areas to standard within each unit. Communal open space is also provided in line with requirements.</i></p> <p><i>(iii) The development comprises 25 car parking spaces. This represents a parking ratio of 0.25 spaces per unit. This is considered acceptable given the site's central and accessible location within Balbriggan town centre, proximity to services and amenities, and to high quality transport links.</i></p>

<p><i>to contribute to the capacity to establish and operate shared mobility measures;</i></p> <p>(iv) <i>The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;</i></p> <p>(v) <i>The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.</i></p>	<p>(iv) This is noted.</p> <p>(v) The blocks provide for up to 10 units per core.</p>
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### DESIGN MANUAL FOR URBAN ROADS & STREETS (DMURS), 2019

The Design Manual for Urban Roads and Streets (DMURS) was first published in 2013 and has since been updated in May 2019. This document sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

#### EVALUATION OF CONSISTENCY

The proposed Templar Place SHD internal road layout has been designed in accordance with the principles and guidelines outlined in the Design Manual for Urban Roads and Streets (DMURS), published by the Department of Transport, Tourism and Sport and the Department of Environment, Community and Local Government, in 2013.

Sightline visibility splays are informed in Table 4.2 of DMURS, where the Safe Stopping Distance (SSD) Standard is required. As the Templar Place SHD will be situated off Quay Street, an urban road of design speed of 50km/h where there is no bus route, the SSD standard required is 45m, which is achievable from both sides of the road at the proposed site entrance.

The widths of the carriageway are outlined in Section 4.4.1 of DMURS. The design lane width for the development can be classified as 'local', where the minimum required width is between 2.5-2.75. The Templar Place SDH will provide lane widths ranging from 3.0 m to 3.15m, which is in accordance with the guidelines stipulated in DMURS. Regarding footpath width, the internal footpath located at the car park will have 1.8. meters wide, which so complies with the required standards.

In addition, the parking spaces located on the ground floor of the Templar Place SHD will be perpendicular and will measure 2.4m in width and 5m in length, which is in accordance with specification on section 4.4.9 of DMURS.

### GUIDELINES FOR PLANNING AUTHORITIES ON CHILDCARE FACILITIES, 2001

These guidelines state that Development Plans should facilitate the provision of childcare facilities in larger new housing estates with the standard minimum provision of one childcare facility with 20 places for each 75 dwellings.

Section 4.7 of the *Sustainable Urban Housing Design Guidelines for New Apartments*, 2020 states the following:

*“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. **One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.**”*

#### EVALUATION OF CONSISTENCY

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.

#### SMARTER TRAVEL – A SUSTAINABLE TRANSPORT FUTURE: A NEW TRANSPORT POLICY FOR IRELAND 2009-2020

Key targets of this national sustainable transport policy include:

- To support sustainable travel, future population and employment growth will have to predominantly take place in sustainable compact urban areas or rural areas, which discourage dispersed development and long commuting
- Work-related commuting by car will be reduced from a current modal share of 65% to 45%, which will mean that between 500,000 and 600,000 commuters will be encouraged to take means of transport other than car driver (of these 200,000 would be existing car drivers). Change in personal behaviour will also be necessary for other travel purposes as most travel relates to non-commuting.
- Car drivers will be accommodated on other modes such as walking, cycling, public transport and car sharing (to the extent that commuting by these modes will rise to 55% by 2020) or through other measures such as e-working.



- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current total car kilometres.

#### EVALUATION OF CONSISTENCY

The proposed development is in line with this overall vision for better integration between land-use and transport. The reduced car parking provision along with the site's proximity to high quality public transport – the Northern Commuter Rail Line and several bus services ensure that there will be a modal shift amongst residence in this scheme to try alternative modes of transport and reduce reliance on the private car.

#### TRANSPORT STRATEGY FOR THE GREATER DUBLIN AREA 2016-2035

The NTA Strategy promotes the consolidation of the Metropolitan Dublin area (where the application is located) allowing for the accommodation of a greater population than at present, with much-enhanced public transport system, with the expansion of the built up areas providing for well-designed urban environments linked to high quality public transport networks, enhancing the quality of life for residents and workers alike. This document identifies under its primary policy, in section 2.2 that *“the Strategy must therefore, promote, within its legislative remit, transport options which provide for unit reductions in carbon emissions. **This can most effectively be done by promoting public transport, walking and cycling, and by actively seeking to reduce car use in circumstances where alternative options are available.**”*

#### EVALUATION OF CONSISTENCY

This proposed development with its reduced car parking ratio and due to its location within Balbriggan Town Centre, close to several bus routes, and Balbriggan train station is in line with the ambitions of this policy. The proposed development, by its promotion of reduced car parking, promotes the use of alternative modes of transport including cycling, walking and public transport.

#### GUIDELINES FOR PLANNING AUTHORITIES ON THE PLANNING SYSTEM AND FLOOD RISK MANAGEMENT, 2009

These guidelines require the planning system to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.

The Guidelines adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

#### EVALUATION OF CONSISTENCY

A Floodrisk Assessment has been prepared by JBA Consulting Engineers.

A review of the available historic information confirms that the site has not experienced historic flooding. However, the Balbriggan has been subject to predictive flood modelling under the FEM FRAM study. The resulting flood maps confirms that the northern boundary of the site with Quay Street during the 1% AEP (Flood Zone A) and the 0.1% AEP (Flood Zone B) events.

Based on the historic and predicted flood risk, a site-specific hydraulic model has been developed to investigate the flood risk to the site and includes the assessment of climate change and residual risks.

The resulting flood maps from the modelling study confirm that all the proposed residential dwellings are at a low risk of inundation and not at risk from the 0.1% AEP flood event. Due to the site location, the site has been assessed for both fluvial and tidal flood sources.

The provided Finished Floor Levels for Quay Street surpasses the minimum requirements outlined in the Strategic Floodrisk Assessment for the area. The exception is for the two retail units fronting onto Quay Street. It is necessary to comply with Part M building standard requirements therefore the FFL of the retail units needs to tie into the existing levels along Quay Street. A unit is located in Flood Zone C while the other is located in Flood Zone B. This complies with the FRA guidelines.

In summary the key areas of the proposed residential dwellings and shared amenity areas will not be impacted any of the modelled flood events, therefore, are suitable for the development of residential and commercial buildings.

## LOCAL PLANNING POLICY

### FINGAL COUNTY DEVELOPMENT PLAN 2017-23

The site is located within the administrative area of Fingal County Council and is therefore subject to the land use policies and objectives of the County Development Plan 2017-2023.

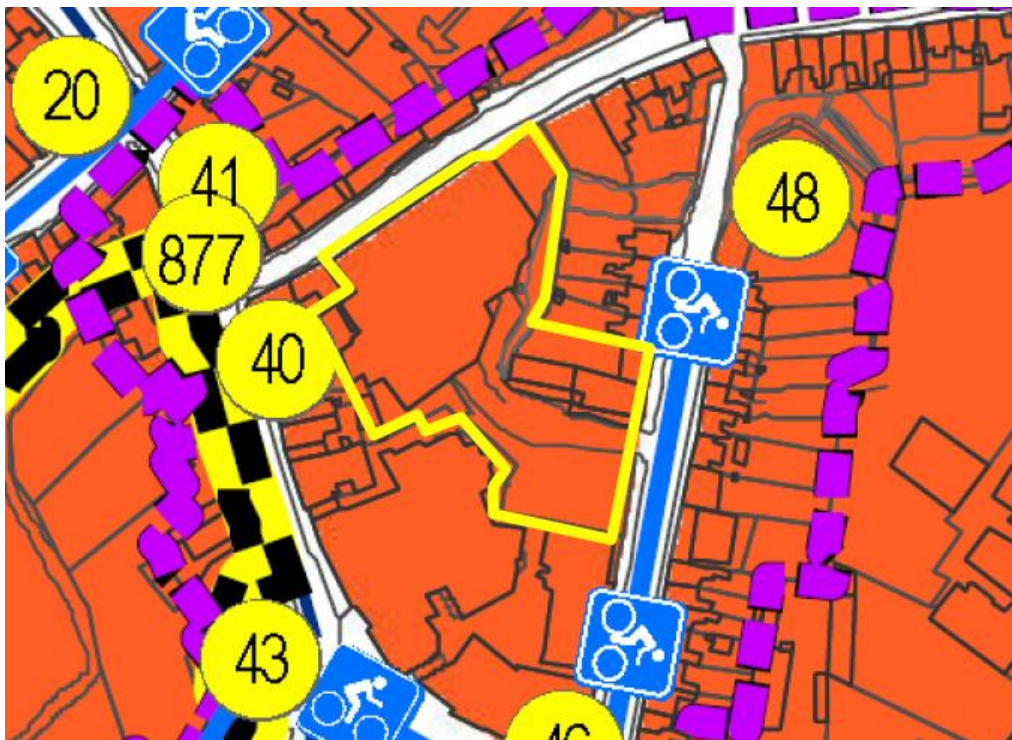
#### Zoning

The subject site is zoned 'MC' – Major Town Centre, with the objective to 'Protect, provide for and/or improve major town centre facilities.'

The zoning vision elaborates the following:

*'Consolidate the existing Major Towns in the County, (Blanchardstown, Swords and Balbriggan). The aim is to further develop these centres by densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses, and urban streets, while delivering a quality urban environment which will enhance the quality of life of resident, visitor and workers alike. The zone will strengthen retail provision in accordance with the County Retail Strategy, emphasise urban conservation, ensure priority for public transport, pedestrians and cyclists while minimising the impact of private car based traffic and enhance and develop the existing urban fabric. In order to deliver this vision and to provide a framework for sustainable development, masterplans will be prepared for each centre in accordance with the Urban Fingal Chapter objectives.'*

"Residential" and "Retail – Local < 150 sqm nfa" as proposed are both Permitted in Principle uses.



## Chapter 2 - Core Strategy & Settlement Strategy



Balbriggan is the largest settlement with the “Hinterland” area of Fingal County and as per Table 2.6 of the Development Plan has c. 153 ha of zoned land available to provide c.4,332 residential units.

The Development Plan seeks to direct development in the Hinterland into towns and villages in order to discourage dispersed development and unsustainable travel patterns.

The Plan envisages that the future development and growth of Fingal will take place in accordance with an overarching hierarchy of settlement centres. Balbriggan is the only “Large Growth Town – Level II” in the Hinterland area.

Major investment by Fingal County Council and other stakeholders in the town’s water services and roads infrastructure has provided a basis for the town to continue to grow in a sustainable manner. Continued residential growth within the town and particularly within the town centre is supported by the Development Plan and the following Objectives are noted:

### Settlement Strategy

Policy/Objectives	Evaluation of Consistency
<p><b>Objective SS01</b></p> <p><i>Consolidate the vast majority of the County’s future growth into the strong and dynamic urban centres of the Metropolitan Area while directing development in the hinterland to towns and villages, as advocated by national and regional planning guidance.</i></p>	<p>The proposed residential development within Balbriggan Town Centre accords with this policy.</p>

<p><b>Objective SS01a</b> <i>Support the implementation of and promote development consistent with the National Strategic Outcome of Compact Growth as outlined in the NPF and the Regional Strategic Outcome of Compact Growth and Regeneration as set out in the RSES.</i></p>	<p>The proposed residential development within Balbriggan Town Centre accords with the NPF and RSES as outlined above.</p>
<p><b>Objective SS01b</b> <i>Consolidate within the existing urban footprint, by ensuring of 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and 30% of all new homes are targeted within the existing built-up areas to achieve compact growth of urban settlements, as advocated by the RSES.</i></p>	<p>The proposed residential development within Balbriggan Town Centre accords with the NPF and RSES as outlined above.</p>
<p><b>Objective SS02</b> <i>Ensure that all proposals for residential development accord with the County's Settlement Strategy and are consistent with Fingal's identified hierarchy of settlement centres</i></p>	<p>The proposed residential development within Balbriggan Town Centre accords with the FCC Settlement Strategy.</p>
<p><b>Objective SS02a</b> <i>Development will be permitted in principle on lands where there is a Local Area Plan or Masterplan in place and only when these lands are substantially developed will permission be granted for the development of lands without such a framework. Should the lands identified within a LAP or Masterplan not come forward for development in the short term, consideration will be given to other lands.</i></p>	<p>The location of this new development within Balbriggan Town Centre accords with Objective SS02b.</p>
<p><b>Objective SS02b</b> <i>Focus new residential development on appropriately zoned lands within the County, within appropriate locations proximate to existing settlement centre lands where infrastructural capacity is readily available, and they are along an existing or proposed high quality public transport corridors and on appropriate infill sites in the town centres, in a phased manner alongside the delivery of appropriate physical and social infrastructure.</i></p>	<p>The site is not located in an area subject to an LAP or Masterplan as per Objective SS02a. However when read alongside Objective SS02b it is evident that the proposed residential development within Balbriggan Town Centre is in accordance with the County Development Plan.</p>
<p><b>Objective SS03</b> <i>Identify sufficient lands for residential development in order to achieve the housing and population targets set out in the Core Strategy, with a focus on urban regeneration and compact growth while ensuring that excess lands surplus to this specific requirement are</i></p>	<p>This town centre, brownfield, infill development accords with Objective SS03.</p>



<i>not identified, in order to prevent fragmented development, uneconomic infrastructure provision and car dependent urban sprawl.</i>	
<b>Objective SS03a</b> <i>Support the implementation of and promote development consistent with the National Strategic Outcome of Compact Growth as outlined in the NPF and the Regional Strategic Outcome of Compact Growth and Regeneration as set out in the RSES.</i>	The proposed residential development within Balbriggan Town Centre accords with the NPF and RSES as outlined above.
<b>Objective SS19</b> <i>Support and facilitate residential, commercial, industrial and community development to enable Balbriggan to fulfil its role as a Self-Sustaining Town in the Settlement Hierarchy recognising its important role as the largest town in the core area.</i>	The location of this new development within Balbriggan Town Centre accords with Objective SS19.

### **Specific Balbriggan Policies**

Chapter 4 outlines a number of objectives to facilitate the growth and development of Balbriggan, in particular the regeneration of development sites within the town centre. The following are noted of relevance to the proposed development.

<b>Balbriggan Objectives</b>	<b>Evaluation of Consistency</b>
<b>Objective Balbriggan 1</b> <i>Promote and facilitate the development and growth of Balbriggan as the primary service, social, cultural and local tourist centre in north Fingal.</i>	<p>The location of this new development within Balbriggan Town Centre will further improve the area and complement the Our Balbriggan Rejuvenation Plan (which succeeds the Urban Design Framework Plan (2004) and the Heart of Balbriggan Plan (Public Realm Plan) (2011).</p> <p>FCC has commissioned a Public Realm Improvement Strategy and which has been given significant public funding. However the design remains at a nascent stage, and approaches to liaise with FCC and the appointed consultants on its plans were not possible prior to lodging of this application.</p> <p>It was therefore not possible to extend the application boundary to include for broader upgrades to Quay Street given these are being delivered separately by FCC.</p> <p>Nevertheless CSR Landscape Architects have a proposed landscape design within the</p>
<b>Objective Balbriggan 2</b> <i>Facilitate the implementation of the Urban Design Framework Plan and Balbriggan Public Realm Plan for the town centre to encourage the regeneration of the identified potential development sites within the town centre.</i>	
<b>Objective Balbriggan 11</b> <i>Ensure a safe and convenient road, pedestrian and cycle system promoting permeability, accessibility and connectivity between existing and new developments within the town.</i>	

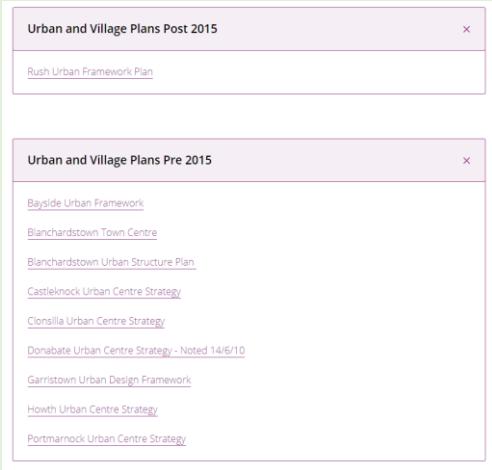


	<p>application site that responds positively and complements the conceptual designs made publicly available to date.</p> <p>It's worth noting that the principle area of redevelopment along Quay Street will be at the eastern end adjacent the Harbour Area where the existing car park will be redesigned to accommodate a new park, plaza, market, performance area and gateway to the seafront. At the western end of Quay Street, adjacent the application site, the street is narrower and will not be a location for new public space provision but will undergo improvements to footpath and road design and materiality. From CSR own investigations, it is noted that street trees on the southern side of Quay Street will not be possible given the extent of existing services although it could be accommodated along the northern side.</p> <p>As proposed, the proposed public realm improvement along Quay Street immediate to the site, complements what is understood to be the emerging design for the street. However, these proposals can naturally be adjusted to reflect the final styles and materials decided for the public areas / streets in due course and the current proposal does not prejudice this possibility which can be appropriately conditioned under a grant of permission.</p>
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### **Sustainable Placemaking**

The following policies/objectives are noted of relevance to the current proposal:

<b>Policies/Objectives</b>	<b>Evaluation of Consistency</b>
<b>Objective PM01</b> <i>Support the development of sustainable low-carbon climate resilient communities.</i>	This town centre, brownfield, infill residential development accord with this policy.
<b>Objective PM03</b> <i>Identify obsolete and potential renewal areas within the County and encourage and facilitate the re-use and regeneration of derelict land and buildings in the County's urban centres.</i>	This town centre, brownfield, infill residential development accord with this policy.

<p><b>Objective PM05</b> <i>Develop a hierarchy of high quality vibrant and sustainable urban and village centres including the continued sustainable development and enhancement of:</i></p> <ul style="list-style-type: none"> <li>• Swords as the County Town of Fingal,</li> <li>• Blanchardstown as a vibrant major town centre,</li> <li>• Balbriggan as a large growth town,</li> <li>• The network of town, village and district centres,</li> <li>• A range of local and neighbourhood centres.</li> </ul>	<p>This town centre, brownfield, infill residential development accord with this policy as relevant to Balbriggan.</p>
<p><b>Objective PM06</b> <i>Protect the primacy and maintain the future viability of the existing major towns in the County and develop them with an appropriate mix of commercial, recreational, civic, cultural, leisure, tourism and residential uses.</i></p>	<p>This town centre, brownfield, infill residential development accord with this policy as relevant to Balbriggan.</p>
<p><b>Objective PM12</b> <i>Ensure high standards of energy efficiency in existing and new residential developments in line with good architectural conservation practice and promote energy efficiency and conservation in the design and development of new residential units, encouraging improved environmental performance of building stock.</i></p>	<p>The proposed development will be carried out and maintained in accordance with best practice as outlined in the MDO Architects Design Statement and the Building Lifecycle Report prepared by Aramark.</p>
<p><b>Objective PM17</b> <i>Consider the Urban Design Framework prepared for the centre of Balbriggan to inform and guide development in this area.</i></p>	<p>The Urban Design Framework Plan (2004) is no longer publicly available (see <a href="https://www.fingal.ie/council/service/urban-framework-plan">https://www.fingal.ie/council/service/urban-framework-plan</a>)</p> <div data-bbox="852 1420 1345 1888">  </div> <p>Furthermore the 2004 Plan has been superseded by the Our Balbriggan 2019 – 2025 Rejuvenation Plan.</p>

	This current plan has been considered in the current proposal, as summarised in further detail below.
<b>Objective PM27</b> <i>Enhance the visual amenity of existing town and village centres, minimising unnecessary clutter, and provide guidance on public realm design, including wirescape, shopfront design, street furniture and signage.</i>	The proposed development will help enhance the visual amenity of Quay Street and High Street as detailed in the Design Reports prepared by MDO Architects and CSR Landscape Architects.
<b>Objective PM28</b> <i>Improve the efficiency of existing buildings and require energy efficiency and conservation in the design and development of all new buildings within the County.</i>	The proposed development will be carried out and maintained in accordance with best practice as outlined in the MDO Architects Design Statement and the Building Lifecycle Report prepared by Aramark.
<b>Objective PM29</b> <i>Promote energy efficiency and conservation above Building Regulations standards in the design and development of all new buildings and residential schemes in particular and require designers to demonstrate that they have taken maximising energy efficiency and the use of renewable energy into account in their planning application.</i>	
<b>Objective PM30</b> <i>Encourage the production of energy from renewable sources, such as from Bio-Energy, Solar Energy, Hydro Energy, Wave/Tidal Energy, Geothermal, Wind Energy, Combined Heat and Power (CHP), Heat Energy Distribution such as District Heating/Cooling Systems, and any other renewable energy sources, subject to normal planning considerations and in line with any necessary environmental assessments.</i>	The proposed development includes for PV panels to be located on the roofs, and which will provide for a proportion of the future developments electrical needs. Refer to the documentation from Varming Consulting Engineers for further details.
<b>Objective PM31</b> <i>Promote excellent urban design responses to achieve high quality, sustainable urban and natural environments, which are attractive to residents, workers and visitors and are in accordance with the 12 urban design principles set out in the Urban Design Manual – A Best Practice Guide (2009).</i>	The Urban Design Manual Criteria are assessed in detail in the MDO Design Statement and in this Statement of Consistency.
<b>Objective PM32</b> <i>Have regard to the joint Department of Transport, Tourism and Sport and the Department of Environment, Community and Local Government's Design Manual for Urban Streets and Roads (DMURS), (2013) and the National Transport Authority's Permeability Best</i>	

<p><i>Practice Guide (2015), in the provision of good urban design.</i></p> <p><b>Objective DMS117</b> <i>Require new developments to be designed in accordance with DMURS. In particular they shall have layouts and designs which reflect the primacy of walking and cycling by providing safe, convenient and direct access to local services, employment and public transport. The promotion of cycling as a sustainable mode of transport depends on providing sufficient parking at places of employment and education. Bicycle parking standards, which are norms, are set out in Table 12.9.</i></p>	<p>The proposed development has been designed in accordance with these policies with DMURS compliance (and cycle parking details) outlined in the ORS Consulting Engineers Traffic Assessment.</p>
<p><b>Objective PM33</b> <i>Enhance and develop the fabric of existing and developing rural and urban centres in accordance with the principles of good urban design, including the promotion of high quality well-designed visually attractive main entries into our towns and villages.</i></p>	<p>This town centre, brownfield, infill residential development accord with this policy as relevant to Balbriggan.</p>
<p><b>Objective PM34</b> <i>Locate different types of compatible land uses e.g. residential, employment, local retail, tourism and daily service needs close together, so as to encourage a greater emphasis on the use of sustainable transport modes.</i></p>	<p>This residential and retail development located on this town centre, brownfield, infill site close to services and public transport accords with this policy as relevant to Balbriggan.</p>
<p><b>Objective PM35</b> <i>Encourage a mix of uses in appropriate locations, e.g. urban centres, village centres, neighbourhood centres.</i></p>	<p>This residential and retail development located on this town centre, brownfield, infill site close to services and public transport accords with this policy as relevant to Balbriggan.</p>
<p><b>Objective PM36</b> <i>Encourage appropriate residential, social and community uses in town and village centres in order to enhance their vitality and viability and recognising diversity of communities and actively promote these uses in existing under-utilised or vacant building stock as a mechanism to combat vacancy in town centres.</i></p>	<p>This residential and retail development located on this town centre, brownfield, infill site close to services and public transport accords with this policy as relevant to Balbriggan.</p>
<p><b>Objective PM37</b> <i>Ensure an holistic approach, which incorporates the provision of essential and appropriate facilities, amenities and services, is taken in the design and planning of new residential areas, so as to ensure that viable sustainable communities emerge and grow.</i></p>	<p>This residential and retail development located on this town centre, brownfield, infill site close to services and public transport accords with this policy as relevant to Balbriggan.</p>
<p><b>Objective PM39</b></p>	<p>This residential and retail development located on this town centre, brownfield, infill site close</p>

*Ensure consolidated development in Fingal by facilitating residential development in existing urban and village locations*

to services and public transport accords with this policy as relevant to Balbriggan.

Residential design standards in the Development Plan reflect national guidelines including *Delivering Homes Sustaining Communities* (2007), *Quality Housing for Sustainable Communities* (2007), *Sustainable Urban Housing: Design Standards for New Apartments* (2007 & 2015), *Sustainable Residential Development in Urban Areas* (2009), and *Urban Design Manual a Best Practice Guide* (2009).

Policies/Objective	Evaluation of Consistency
<b>Objective PM38</b> <i>Achieve an appropriate dwelling mix, size, type, tenure in all new residential developments</i>	The proposed mix of studio, 1-bed and 2-bed apartment units is considered a suitable mix for this location within the heart of Balbriggan Town Centre and will appeal to a range of household types includes singles, couples, starter families, and empty nesters, who do not require large, family homes at this stage in their family life cycle, and also want to be centrally located close to services and public transport.  The mix accords with the 2020 Apartment Guidelines also.
<b>Objective PM40</b> <i>Ensure a mix and range of housing types are provided in all residential areas to meet the diverse needs of residents.</i>	
<b>Objective PM41</b> <i>Encourage increased densities at appropriate locations whilst ensuring that the quality of place, residential accommodation and amenities for either existing or future residents are not compromised.</i>	The proposed development provides for an appropriate densification of a centrally located, infill, brownfield site close to services and public transport.
<b>Objective PM42</b> <i>Implement the policies and objectives of the Minister in respect of 'Urban Development and Building Heights Guidelines' (December 2018) and Sustainable Urban Housing: Design Standards for New Apartments (March 2018) issued under section 28 of the Planning and Development Act, as amended.</i>	Accordance with all relevant Ministerial Guidelines is outlined earlier in this Statement.
<b>Objective PM43</b> <i>Have regard to 'Sustainable Urban Housing: Design Standards for New Apartments' (2007) (or any update or revision of these standards) when assessing apartment developments.</i>	

To achieve sustainable placemaking, urban areas such as Balbriggan are expected to develop sustainable residential communities in mixed use areas including zoned town centres, with appropriate densities to be achieved *"dependant on location, the use of an appropriate variety and mix of good quality, well designed dwelling types and sizes, and the encouragement of infill and brownfield development to consolidate existing towns in preference to greenfield development."*

Balbriggan Town Centre contains the components identified in the Development Plan for achieving successful and sustainable residential communities and for facilitating additional residential development as is proposed in this instance. We note the following characteristics:

- A range of facilities focused in a consolidated area with a critical mass of attractions and that make best use of the already established investment in the built environment; these attractions include a mix of shops as well as a wide range of financial, professional and government services together with cultural, entertainment and leisure facilities.
- A thriving local residential population which adds to the vitality and vibrancy of the area as it ensures activity outside of standard retail and office opening hours.
- Easily accessible by a range of transport modes including cycling and walking, have sufficient good quality short stay car parking close to the core area, have good transport linkages within the centre, and have efficient arrangements for delivery of goods.
- Presents an attractive amenity in terms of the built environment and streetscape, streets and public spaces which are considered clean and safe, and have a sense of local identity and character, all of which greatly enhances the attraction of the centre.
- Can encourage and facilitate sustainable lifestyles and livelihoods.

Specifically, as per Objectives PM44 & 45, vacant and underutilised infill sites are promoted for redevelopment particularly where “*contemporary and innovative design solutions*” are employed “*subject to the design respecting the character and architectural heritage of the area*”.

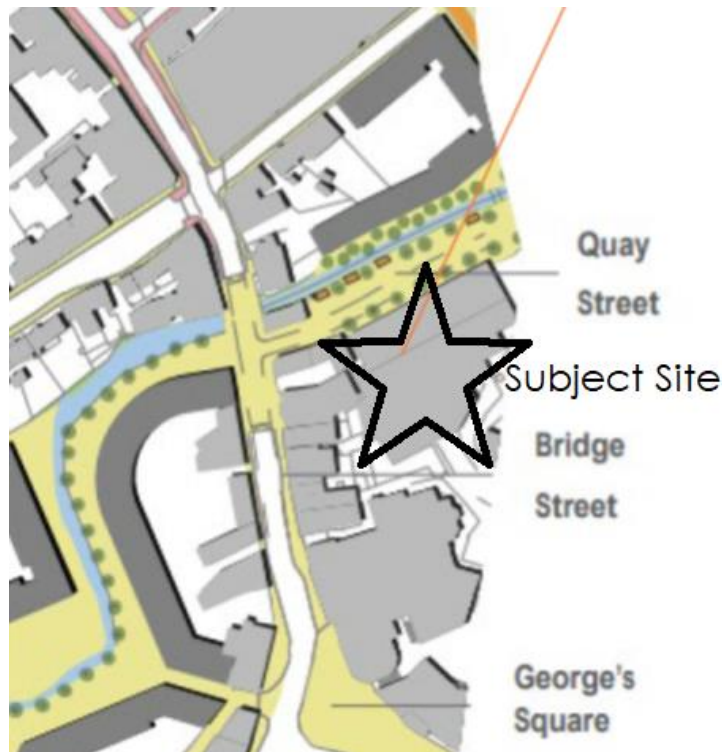
Policies/Objective	Evaluation of Consistency
<b>Objective PM44</b> <i>Encourage and promote the development of underutilised infill, corner and back land sites in existing residential areas subject to the character of the area and environment being protected.</i>	The proposed development accords with these two objectives as is detailed in this Statement of Consistency, the Statement of Response to the ABP Opinion, the MDO Architects Design Report, and the CSR Landscape Architects Design Report.
<b>Objective PM45</b> <i>Promote the use of contemporary and innovative design solutions subject to the design respecting the character and architectural heritage of the area.</i>	

### **Public Realm**

The development of high quality Public Realm is a key aspect of developing sustainable town centre placemaking and FCC have produced Public Realm Strategies for the main towns including Balbriggan.

“*The Heart of Balbriggan*’ (2011) was a Public Realm Plan aimed to transform the town centre into a vibrant commercial, social and cultural centre. The river, central park, the main street (Dublin Road, Bridge Street, Drogheda Street) and Quay Street are among the three main elements of the town’s urban and landscape structure, which have the greatest need and potential for improvement. The strategy recognises the importance of addressing vacancy and improving the attractiveness of buildings and streets. The physical and visual ‘bottleneck’ near the Bridge Street/The Quay junction is highlighted as a key point of concern in Balbriggan and future plans aim to achieve a shared surface arrangement which opens up the vista and physical connection to the harbour.

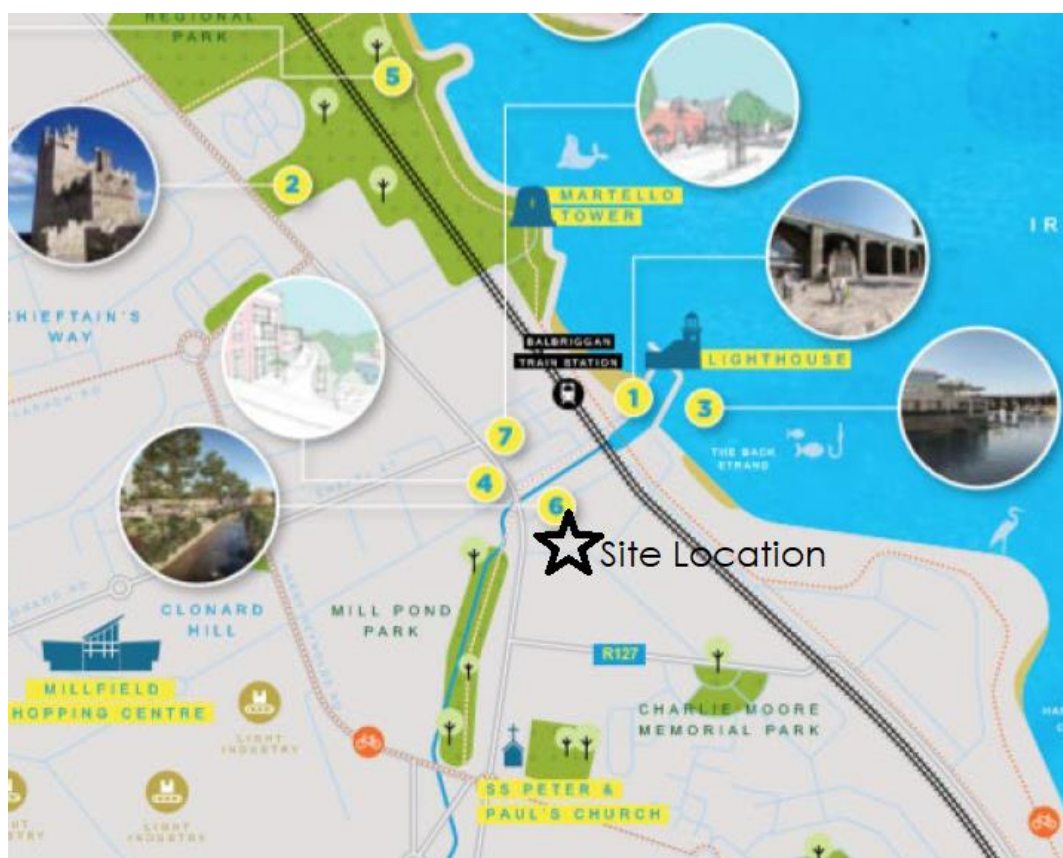




*“Our Balbriggan 2019 – 2025 Rejuvenation Plan” (2019) has now superseded the 2011 “Heart of Balbriggan” Plan and sets out a menu of physical improvements for the town centre and adjoining Harbour Area. It identifies the “need for a sustained focus on rejuvenating the original town centre and main street and how they relate to the expanded town, with a view to creating a more attractive, connected place that people want to live and spend time in for work, shopping or recreational purposes.”*

A series of priority projects have been identified following extensive public consultation. One of these is the transformation of Quay Street, through a series of measures including:

*“Widen footpaths and increase flow and visibility from main street to a transformed Quay Street, Viaduct and Harbour area. Maintain car park amenity, remove kerbing, enabling its usage in evenings and weekends as a quality civic and meeting space. Develop linear park featuring seating, planting and other green features along the river bank.”*



The proposed development can align with these objectives in redeveloping the former shopping centre site along Quay Street to provide a new and attractive streetscape and reinstated urban grain.

The public realm improvements including footpath widening will encourage greater pedestrian movement between the harbour and the main street. The provision of a new residential development along Quay Street will further enhance the public realm improvements proposed by Fingal County Council.

### Open Space

Section 3.5 of the Development Plan outlines open space requirements for new developments. The plan seeks to ensure that a sufficient quantity of open space and recreational space is provided either on site or within close proximity to new residential developments.

Policies/Objective	Evaluation of Consistency
<b>Objective PM51</b> <i>Provide a wide variety of accessible public open spaces, including allotments, community gardens, permaculture parklands and sporting facilities, on a hierarchical basis throughout the County in order to achieve a choice of open space facilities. Best practice Green Infrastructure Guidelines should be used to determine the location and type of open spaces to be provided.</i>	<p>The proposed development includes a large communal courtyard extending to 1,400 sq.m which will serve recreational needs of future residents.</p> <p>Residents will also be able to access 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-</p>

	purpose plaza area and a linear park alongside the Bracken River, featuring tiered seating for events, repurposing the Railway Viaduct arches into a vibrant market space, including redevelopment of the RNLI Boathouse. This new space will be directly accessible for future residents.
<p><b>Objective PM52</b> <i>Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.</i></p> <p><b>Objective DMS57</b> <i>Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.</i></p>	<p>The proposed town centre development does not propose any public open space on site.</p> <p>A large communal open space is provided in the heart of the development to serve future residents.</p> <p>Residents will also 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.</p>
<p><b>Objective DMS57a</b> <i>Require a minimum 10% of a proposed development site area be designated for use as public open space.</i></p> <p>The Council has the discretion for the remaining open space required under Table 12.5 to allow provision or upgrade of small parks, local parks and urban neighbourhood parks and/or recreational/amenity facilities outside the development site area, subject to the open space or facilities meeting the open space 'accessibility from homes' standards for each public open space type specified in Table 12.5.</p> <p>The Council has the discretion for the remaining open space required under Table 12.5 to allow provision or upgrade of Regional Parks in exceptional circumstances where the provision or upgrade of small parks, local parks and urban neighbourhood parks and/or recreational/amenity facilities is not achievable. This is subject to the Regional Park meeting the open</p>	<p>The proposed town centre development does not propose any public open space on site.</p> <p>Residents will also 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.</p> <p>The Council'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.</p> <p>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</p>

space 'accessibility from homes' standard specified in Table 12.5.	the Urban Regeneration Development Fund (URDF).
<p><b>Objective DMS57B</b></p> <p><i>Require a minimum 10% of a proposed development site area be designated for use as public open space. The Council has the discretion to accept a financial contribution in lieu of remaining open space requirement required under Table 12.5, such contribution being held solely for the purpose of the acquisition or upgrading of small parks, local parks and urban neighbourhood parks and/or recreational/amenity facilities subject to the open space or facilities meeting the open space 'accessibility from homes' standards for each public open space type specified in Table 12.5. The Council has the discretion to accept a financial contribution in lieu of the remaining open space requirement to allow provision or upgrade of Regional Parks in exceptional circumstances where the provision or upgrade of small parks, local parks and urban neighbourhood parks and/or recreational/amenity facilities is not achievable, subject to the Regional Park meeting the open space 'accessibility from homes' standard specified in Table 12.5. Where the Council accepts financial contributions in lieu of open space, the contribution shall be calculated on the basis of 25% Class 2 and 75% Class 1 in addition to the development costs of the open space.</i></p>	<p>The proposed town centre development does not propose any public open space on site.</p> <p>Residents will also 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.</p> <p>The Council'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.</p> <p>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).</p>
<p><b>Objective PM53</b></p> <p><i>Require an equivalent financial contribution in lieu of open space provision in smaller developments where the open space generated by the development would be so small as not to be viable.</i></p>	<p>The proposed town centre development does not propose any public open space on site.</p> <p>Residents will also 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.</p> <p>The Council'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.</p> <p>Furthermore, we note that the Balbriggan Rejuvenation Project, which includes the Quay</p>



	Street and Harbour area improvements have recently been allocated €25.4m in funding under the Urban Regeneration Development Fund (URDF).
<b>Objective DMS59</b> Ensure every home within a new residential scheme is located within 150 metres walking distance of a pocket park, small park, local park, urban neighbourhood park or regional park.	Quay Street Park and playground is located c.100m from the proposed development.
<b>Objective PM62</b> <i>Provide multifunctional open spaces at locations deemed appropriate providing for both passive and active uses.</i>	The proposed communal open space will be multi-functional for future residents, as detailed in the CSR Design Statement.
<b>Objective PM63</b> <i>Facilitate the provision of appropriately scaled children's playground facilities within new and existing residential development.</i>	Play provision for a range of age groups is accommodated within the communal open space as per CSR Drawing No 20445-2-102.
<b>Objective PM65</b> Ensure all areas of private open space have an adequate level of privacy for residents through the minimisation of overlooking and the provision of screening arrangements.	This is provided for within the design and is detailed in the MDO Architects Design Statement.
<b>Objective PM66</b> <i>Ensure provision of accessible, adequate and diverse community facilities and services in new and established areas to provide for the well-being of residents.</i>	The proposed BTR will provide a range of Residential Amenities on site. The development will also benefit from its location within the town centre of Balbriggan with a range of community services located within walking distance.
<b>Objective PM69</b> <i>Ensure that proposals do not have a detrimental effect on local amenity by way of traffic, parking, noise or loss of privacy of adjacent residents.</i>	Parking is located discretely within the development and totals 25 spaces. No long term noise or privacy issue will occur from the completed development as is detailed in the MDO Architects Design Statement.
<b>Objective PM74</b> <i>Encourage the provision of childcare facilities in appropriate locations, including residential areas, town and local centres, areas of employment and areas close to public transport nodes.</i>	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 up to c.37 spaces.
<b>Objective PM76</b> <i>Require as part of planning applications for new residential and commercial developments that provision be made for appropriate purpose built childcare facilities where such facilities are deemed necessary by the Planning Authority.</i>	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.
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### **Movement**

<b>Objective MT02</b> <i>Support the recommendations of the National Transport Authority's Transport Strategy for the Greater Dublin Area 2016-2035 to facilitate the future sustainable growth of Fingal.</i>	The proposed, brownfield, town centre development accords with this policy and as outlined earlier in this Statement.
<b>Objective MT03</b> <i>Implement Smarter Travel – A Sustainable Travel Future policy and work to achieve the Key Goals set out in this policy.</i>	The proposed, brownfield, town centre development accords with this policy and as outlined earlier in this Statement.
<b>Objective MT04</b> At locations where higher density development is being provided, encourage the development of car-free neighbourhoods, where non-motorised transport is allowed and motorised vehicles have access only for deliveries but must park outside the neighbourhood, creating a much better quality public realm with green infrastructure, public health, economic and community benefits.	The proposed, brownfield, town centre development provides a reduced parking provision of 25 spaces to serve the 101 BTR units. The spaces are also located below the communal open space.
<b>Objective MT05</b> <i>Integrate land use with transportation by allowing higher density development along higher capacity public transport corridors.</i>	The proposed development is within 250m of Balbriggan Train Station which is on the high capacity Northern Commuter rail line and which is due to be further upgraded under the DART+ Programme which will see DART services running between Drogheda and Dublin City Centre.
<b>Objective MT10</b> <i>Facilitate the provision of electricity charging infrastructure for electric vehicles both on street and in new developments in accordance with car parking standards.</i>	The development will include EV charging points within the residents carpark to cater for E-car demand of the residence.
<b>Objective MT13</b> <i>Promote walking and cycling as efficient, healthy, and environmentally-friendly modes of transport by securing the development of a network of direct, comfortable, convenient and safe cycle routes and footpaths, particularly in urban areas.</i>	The proposed development will be accessible to the current system of public footpaths and cycleways within Balbriggan Town Centre, and which are expected will be further improved with the recently confirmed URDF funding.

### **Economic Development**

The incorporation of economic objectives is relevant to this development as it aims to create vibrant and seamlessly integrated retail units at the ground level of this development. The retail units will support residents as well as the wider community of Balbriggan.



Policies/Objectives	Evaluation of Consistency
<b>Objective ED04</b> <i>Prioritise locating quality employment and residential developments in proximity to each other in order to reduce the need to travel and ensure that suitable local accommodation is available to meet the needs of workers in the County.</i>	<p>The proposed residential development will be located within Balbriggan Town Centre close to employment areas in the town which will allow future residents to travel by foot or cycle.</p>
<b>Objective ED42</b> <i>Ensure the development of Balbriggan, Malahide, Skerries and Charlestown as sustainable, vibrant and prosperous Town Centres performing at a high retail level within the Fingal Retail Hierarchy to meet the retailing needs of and offer sufficient retail choice to their local populations and catchment populations.</i>	<p>The proposed development include for two additional retail unit which, along with the residential element, will help rejuvenate Quay Street and make it a more attractive town centre street.</p>
<b>Objective ED86</b> <i>Support economic growth within the Core area through strengthening and promoting the importance of Balbriggan as the major urban centre and directing appropriately scaled growth opportunities into the other urban centres in the area.</i>	<p>The proposed development will help increase the residential population living within the town centre of Balbriggan ensuring that future residents are located proximate to and will support local employment and services.</p>

#### **Infrastructure & Floodrisk**

Objectives/Policies	Evaluation of Consistency
<b>Objective WT07</b> <p>Require all new developments to provide separate foul and surface water drainage systems and to incorporate sustainable urban drainage systems.</p>	<p>The development will be served by water supply and wastewater in accordance with Irish Water requirements.</p>
<b>Objective WT08</b> <p>Prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems.</p>	<p>Further details are provided the drawings and report prepared by OSR Consulting Engineers.</p>
<b>Objective SW02</b> <i>Allow no new development within floodplains other than development which satisfies the justification test, as outlined in the Planning System and Flood Risk Management Guidelines 2009 for Planning Authorities (or any updated guidelines).</i>	<p>Please refer to the Floodrisk Assessment prepared by JBA Consulting Engineers which confirms that the key areas of the proposed residential dwellings and shared amenity areas will not be impacted by any of the modelled flood events, therefore, are suitable for the development of residential and commercial buildings.</p>
<b>Objective SW04</b>	

<p><i>Require the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage techniques where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risks.</i></p>	<p>In relation to Surface Water and SUDS, it is noted that at present, the surface water runoff from the site which is (except for a small vacant plot to the northeast) entirely covered in impermeable areas, discharges unattenuated and untreated flow off site.</p> <p>To reduce and attenuate the flow, the proposed development has been designed in accordance with the principles of Sustainable Urban Drainage Systems (SUDS). Further details on the SUDS measures are outlined in the Civil Planning Report prepared by ORS Consulting Engineers.</p>
<p><b>Objective SW07</b> Implement the <i>Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG/OPW 2009)</i> or any updated version of these guidelines.</p>	<p>Please refer to the Floodrisk Assessment prepared by JBA Consulting Engineers which has been prepared in accordance with the guidelines.</p>
<p><b>Objective DMS73</b> <i>Ensure as far as practical that the design of SuDS enhances the quality of open spaces. SuDS do not form part of the public open space provision, except where it contributes in a significant and positive way to the design and quality of open space. In instances where the Council determines that SuDS make a significant and positive contribution to open space, a maximum 10% of open space provision shall be taken up by SuDS. The Council will give consideration to the provision of SuDS on existing open space, where appropriate.</i></p>	<p>Further details on the SUDS measures are outlined in the Civil Planning Report prepared by ORS Consulting Engineers.</p>
<p><b>Objective EN13</b> <i>Encourage and support the development of solar energy infrastructure, including solar PV, solar thermal and seasonal storage facilities</i></p>	<p>The proposed development includes for PV panels to be located on the roofs, and which will provide for a proportion of the future developments electrical needs. Refer to the documentation from Varming Consulting Engineers for further details.</p>
<p><b>Objective DMS146</b> <i>Ensure all new large-scale residential and mixed-use developments include appropriate facilities for source segregation and collection of waste</i></p>	<p>Appropriate operational waste facilities will be provided as detailed in the Operational Waste Management Plan prepared by Traynor Environmental.</p>
<p><b>Objective DMS147</b> <i>Ensure all new developments include well designed facilities to accommodate the three bin collection system.</i></p>	
<p><b>Objective DMS149</b> <i>Require that construction and demolition waste management plans be submitted as part of any planning application for projects in excess of any</i></p>	<p>A Construction and Demolition Waste Management Plan, prepared by Traynor Environmental is included with the application.</p>

*of the following thresholds: New residential development of 10 units or more*

Further details are elaborated in the Civils Design Report and Site Specific Floodrisk Assessment prepared by the ORS Consulting Engineers.

### **Green Infrastructure**

<b>Objectives/Policies</b>	<b>Evaluation of Consistency</b>
<b>Objective GI31</b> <i>Ensure the provision of new green infrastructure addresses the requirements of functional flood storage, the sustainable management of coastal erosion, and links with provision for biodiversity, Sustainable Drainage Systems (SuDS) and provision for parks and open space wherever possible and appropriate</i>	<p>The SuDS proposals (as detailed in the ORS Consulting Engineers documentation) has been designed and sized in consultation with JBA Consulting Engineers with regard to flood risk. The green roofs will be planted accordingly with bio-diverse species as per the details outlined in the CSR Landscape Design Report.</p>
<b>Objective GI33</b> <i>Seek the provision of green roofs and green walls as an integrated part of Sustainable Drainage Systems (SuDS) and which provide benefits for biodiversity, wherever possible.</i>	<p>Green and blue roofs are proposed as part of this application. Further details are outlined in the ORS Consulting Engineers Planning Report.</p>
<b>Objective DMS01</b> <i>Ensure that all plans and projects in the County which could, either individually or in combination with other plans and projects, have a significant effect on a European site or sites are subject to Screening for Appropriate Assessment.</i>	<p>In accordance with Objective NH15 an Appropriate Assessment Screening Report is submitted with this Stage 3 application which concludes that the proposed development is not considered likely to impact on European protected site.</p>
<b>Objective DMS163</b> <i>Ensure Screening for Appropriate Assessment and, where required, full Appropriate Assessment is carried out for all plans and projects in the County which, individually, or in combination with other plans and projects, are likely to have a significant direct or indirect impact on any European site or sites.</i>	<p>Please refer to the Ecological Impact Assessment and Statement of Screening for Appropriate Assessment prepared by Whitehill Environmental. Also refer to the Bat Survey prepared by Wildlife Surveys.</p> <p>With the recommended mitigation measures, it is concluded that the proposed development in Balbriggan will have a neutral impact upon local ecological receptors. The creation of new habitats on the site will be a positive benefit to local ecology and with proper management of the site and its green areas, then local areas of biodiversity will be allowed to develop.</p>
<b>Objective DMS164</b> <i>Ensure that sufficient information is provided as part of development proposals to enable Screening for Appropriate Assessment to be undertaken and to enable a fully informed assessment of impacts on biodiversity to be made.</i>	
<b>Objective DMS165</b> <i>Ensure that Natura Impact Statements (NIS) and any other ecological impact assessments submitted in support of proposals for</i>	

development are carried out by appropriately qualified professionals and that any necessary survey work takes place in an appropriate season	Mitigations measures recommended in the Ecological Impact Assessment and the Bat Survey are incorporated into the Construction & Environmental Management Plan prepared by ORS Consulting Engineers and the Public Lighting Plan and Report prepared by Varming Consulting Engineers.
<b>Objective DMS166</b> <i>Ensure planning applications for proposed developments likely to have significant direct or indirect impacts on any European Site or sites are accompanied by a Natura Impact Statement prepared in accordance with the Guidance issued by the Department of the Environment, Heritage and Local Government (Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, 2009).</i>	

### Heritage

In terms of landscape the site, and Balbriggan in general is located within the Coastal Landscape Character Type, which is given an Exceptional Landscape Value and it considered of High Landscape Sensitivity.

However, as noted in the Landscape & Visual Assessment prepared by CSR Landscape Architects, although the site is in the highly sensitive landscape area of the Coastal Character LCA and the requirement for a landscape and visual impact assessment – its town centre location diminishes the relevance of the sensitivities that are focused on hinterland and more rural landscapes.

The Landscape Character Assessment & Visual Impact Objectives of the Development Plan are assessed as follows:

Policies/Objectives	Evaluation of Consistency
<b>Objective NH33</b> <i>Ensure the preservation of the uniqueness of a landscape character type by having regard to the character, value and sensitivity of a landscape when determining a planning application.</i>	<p>We refer to the Landscape &amp; Visual Assessment prepared by CSR Landscape Architects.</p> <p>The receiving landscape is classified as Medium Sensitivity - Areas where the landscape has certain valued elements, features or characteristics but where the character is mixed or not particularly strong. The character of the landscape is such that there is some capacity for change in the form of development.</p> <p>The importance of the proposed development in terms of its effect on the landscape / townscape is considered to be Moderate.</p>
<b>Objective NH34</b> <i>Ensure development reflects and, where possible, reinforces the distinctiveness and sense of place of the landscape character types, including the retention of important features or characteristics, taking into account the various elements which contribute to their distinctiveness such as geology and landform, habitats, scenic quality, settlement pattern, historic heritage, local vernacular heritage, land-use and tranquillity.</i>	
<b>Objective NH36</b>	

<p><i>Ensure that new development does not impinge in any significant way on the character, integrity and distinctiveness of highly sensitive areas and does not detract from the scenic value of the area. New development in highly sensitive areas shall not be permitted if it:</i></p> <ul style="list-style-type: none"> <li>• <i>Causes unacceptable visual harm</i></li> <li>• <i>Introduces incongruous landscape elements</i></li> <li>• <i>Causes the disturbance or loss of (i) landscape elements that contribute to local distinctiveness, (ii) historic elements that contribute significantly to landscape character and quality such as field or road patterns, (iii) vegetation which is a characteristic of that landscape type and (iv) the visual condition of landscape elements.</i></li> </ul>	<p>The quality of the effect is primarily visual in the immediate vicinity of the site, where the scale and size of the proposed building contrasts or complements the character and scale of the immediate surroundings. The development would however replace a currently derelict or underused and visually poor site and would contribute positively to the local urban structure and urban renewal policy objectives. The building cluster although large is designed to reflect the organic and hap-hazard local roofscape and built form arranged on local hills within the centre of Balbriggan. The materials proposed break up a potentially large structure with locally common finishes, renders and brickwork, allowing it to sit comfortably in the receiving environment. The landscape / townscape is therefore considered Beneficial – in that it improves landscape(townscape)/view quality and character, fits with the scale, landform and pattern and enables the restoration of valued characteristic features or repairs / removes damage caused by existing land uses.</p>
<p><b>Objective NH37</b> <i>Ensure that new development meets high standards of siting and design</i></p>	<p>The assessment also includes a visual assessment of the development from 14 different locations across Balbriggan.</p>
<p><b>Objective NH38</b> <i>Protect skylines and ridgelines from development.</i></p>	<p>Two views recorded no change to the view – the development was not visible. Eight recorded Moderate to Important visual effects. Seven of these were Beneficial and one Neutral. Of the remaining three viewpoints, two were of Low Importance and Neutral and one of Low Importance and Beneficial</p>
<p><b>Objective NH39</b> <i>Require any necessary assessments, including visual impact assessments, to be prepared prior to approving development in highly sensitive areas.</i></p>	<p>The assessment concludes that the proposed design has undergone many iterations to achieve an elegant design in this town centre site. The development is a large intervention in the town however its effects on the local townscape are broadly Beneficial and no Adverse effects predicted.</p> <p>It therefore represents, from a landscape and visual effect perspective, an appropriate new development within the receiving environment</p>
<p><b>Objective NH40</b> <i>Protect views and prospects that contribute to the character of the landscape, particularly those identified in the Development Plan, from inappropriate development.</i></p>	



	and addition to Balbriggan's distinctive townscape.
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In relation to Archaeology and Architectural Heritage we note the following objectives:

Policies/Objectives	Evaluation of Consistency
<p><b>Objective CH02</b> <i>Favour the preservation in situ or at a minimum preservation by record, of archaeological sites, monuments, features or objects in their settings. In securing such preservation the Council will have regard to the advice and recommendations of the National Monuments Service of the Department of the Arts, Heritage, Regional, Rural and Gaeltacht Affairs.</i></p>	<p>The site is not located within a designated Zone of Archaeological Notification in the Development Plan.</p> <p>The 20<sup>th</sup> century redevelopment of the site for a shopping centre is also noted.</p> <p>Nevertheless, archaeological potential is always possible, and a suitably worded condition requiring archaeological monitoring to be carried out during construction is invited.</p>
<p><b>Objective CH07</b> <i>Ensure that development within the vicinity of a Recorded Monument or Zone of Archaeological Notification does not seriously detract from the setting of the feature and is sited and designed appropriately.</i></p>	
<p><b>Objective CH09</b> <i>Recognise the importance of archaeology or historic landscapes and the connectivity between sites, where it exists, in order to safeguard them from developments that would unduly sever or disrupt the relationship and/or inter-visibility between sites.</i></p>	
<p><b>Objective CH20</b> Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, is compatible with the special character, and is appropriate in terms of the proposed scale, mass, height, density, layout, materials, impact on architectural or historic features, and junction with the existing Protected Structure.</p>	<p>The application site does not contain any Protected Structures although it is located proximate to a number. The impact on the setting of same has been considered in detail in the Architectural Heritage Impact Assessment prepared by Molloy &amp; Associates.</p>
<p><b>Objective CH32</b> <i>Avoid the removal of structures and distinctive elements (such as boundary treatments, street furniture, paving and landscaping) that positively contribute to the character of an Architectural Conservation Area.</i></p>	<p>We refer to the Architectural Heritage Impact Assessment prepared by Molloy &amp; Associates.</p> <p>The removal of boundary walls along High Street is justified as it is not considered to be of sufficient interest to warrant its retention, to the detriment of the sustainable redevelopment of the site and the creation of a positive urban contribution to the streetscape.</p>



	On Quay Street it is proposed to retain standing section of boundary wall at the north-eastern boundary and incorporate it into the proposed scheme.
<p><b>Objective CH33</b> <i>Promote the sympathetic maintenance, adaptation and re-use of the historic building stock and encourage the retention of the original fabric such as windows, doors, wall renders, roof coverings, shopfronts, pub fronts and other significant features of historic buildings, whether protected or not.</i></p>	<p>We refer to the Architectural Heritage Impact Assessment prepared by Molloy &amp; Associates.</p> <p>The removal of the outbuilding within the site (accessed from High Street) is required to facilitate purposeful redevelopment of the site.</p>
<p><b>Objective CH37</b> <i>Seek the retention, appreciation and appropriate revitalisation of the historic building stock and vernacular heritage of Fingal in both the towns and rural areas of the County by deterring the replacement of good quality older buildings with modern structures and by protecting (through the use of Architectural Conservation Areas and the Record of Protected Structures and in the normal course of Development Management) these buildings where they contribute to the character of an area or town and/or where they are rare examples of a structure type.</i></p>	<p>The building is not a Protected Structure, nor is it included on the National Inventory of Architectural Heritage (NIAH).</p> <p>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.</p>
<p><b>Objective DMS155</b> <i>Where necessary, the Planning Authority shall require a detailed Architectural Heritage Impact Assessment for an application for works to a Protected Structure. This shall be carried out in accordance with Appendix B of the Department of the Arts Heritage and Gaeltacht's Architectural Heritage Protection Guidelines for Planning Authorities.</i></p>	<p>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.</p> <p>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.</p>
<p><b>Objective DMS157</b> <i>Ensure that any new development or alteration of a building within or adjoining an ACA positively enhances the character of the area and is appropriate in terms of proposed design, including scale, mass, height, proportions, density, layout materials, plot ratio and building lines.</i></p>	<p>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.</p> <p>The new buildings have been aligned with the established pattern of development to positively contribute to the High Street streetscape.</p>

<p><b>Objective DMS158</b> <i>All planning applications for works in an Architectural Conservation Area shall have regard to the information outlined in Table 12.11.</i></p>	<p>This is addressed in the Architectural Heritage Impact Assessment prepared by Molloy &amp; Associates.</p>
<p><b>Objective NH41</b> <i>Ensure that the results of the Historic Landscape Character studies undertaken in the County are taken into account in the development of plans and in the assessment of projects on an ongoing basis.</i></p>	<p>The Historic Landscape Character Study for Balbriggan and Environs was carried out for FCC by Margaret Gowen &amp; Co. Ltd. in 2008 and was considered in the Architectural Heritage Impact Assessment prepared by Molloy &amp; Associates.</p>
<p><b>Objective NH42</b> <i>Ensure development reflects and reinforces the distinctiveness and sense of place of identified historic landscape character types, including the retention of important features or characteristics, taking into account the results of the historic landscape characterisations carried out in the County.</i></p>	<p>A statement of significance for the Balbriggan Historic Core ACA is currently being prepared by Fingal County Council but has not yet been published.</p>

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 advices on the potential impact of the emerging development on its historic setting.

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

### **Car Parking**

Section 7.1 of the Fingal Development Plan 2017-2023 provides the parking control standards for new developments, in which it notes that parking provisions are determined by location to public transport.

The standards are split between 2 no. zones, zone 1 which allows for fewer car parking spaces subject to the following criteria:

- within 1600m of DART, Metro, Luas or BRT (existing or proposed),
- within 800m of a Quality Bus Corridor,
- zoned MC Major Town Centre,
- subject to Section 49 Scheme.

Table 12.8 of the Development Plan proposes the following parking standards for apartments.

Table 12.8 - Car Parking Standards

Land Use	Criterion	Proposed	Notes	Category	Norm or Max
House - urban/suburban 1 or 2 bedrooms	Unit	1-2	Within curtilage	Residential	Norm
House - urban/suburban 3 or more bedrooms	Unit	2	Within curtilage	Residential	Norm
House - rural	Unit	2-3	Within curtilage	Residential	Norm
Apartment, townhouse 1 bedroom	Unit	1	Plus 1 visitor space per 5 units	Residential	Norm
Apartment, townhouse 2 bedrooms	Unit	1.5	Plus 1 visitor space per 5 units	Residential	Norm
Apartment, townhouse 3+ bedrooms	Unit	2	Plus 1 visitor space per 5 units	Residential	Norm

However, 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 – at 0.25 parking ratio. However this is justified having regard to the town centre location, close to public transport and services, and also given it's a Build to Rent development which under SPUR8 of the 2020 Apartment Guidelines can provide a “*default of minimal or significantly reduced car parking provision*”.

### **Bicycle Parking**

Policies/Objectives	Evaluation of Consistency
<b>Objective DMS118</b> <i>Ensure that all new employment and education developments include adequate, secure and dry bicycle parking, in accordance with the standards set out in Table 12.9.</i>	The table requires 1 space per apartment unit and 1 visitor space per 5 units, which would equate to c.121 spaces. The proposed development includes 182 spaces.

### **Residential Development Management Standards**

Policies/Objectives	Evaluation of Consistency
<b>Objective DMS03</b> <i>Submit a detailed design statement for developments in excess of 5 residential units or 300 sq.m m of retail/commercial/office development in urban areas.</i>	Please refer to the detailed Design Statement prepared by MDO Architects submitted in this instance.
<b>Objective DMS05</b> <i>Require new residential developments in excess of 100 units and large commercial/retail developments in excess of 2000 sq.m m to</i>	Given that a final design for Quay Street has not yet been finalised by FCC it is considered that provision of a piece of public art would be premature. Furthermore a piece of public art may be more appropriately located in the

<i>provide for a piece of public art to be agreed with the Council.</i>	proposed Quay Street Park upgrade proposed to the north. A suitably worded condition requiring a special development contribution towards the provision of same may be applicable in this instance.
<b>Objective DMS20</b> <i>Require the provision of a minimum of 50% of apartments in any apartment scheme are dual aspect.</i>	This objective is achieved with 50% of the units proposed being dual aspect. This is further discussed in the Planning Report submitted.
<b>Objective DMS21</b> <i>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.</i>	
<b>Objective DMS22</b> <i>Require a minimum floor to ceiling height of 2.7 metres in apartment units, at ground floor level.</i>	This objective is complied with.
<b>Objective DMS23</b> <i>Permit up to 8 apartments per floor per individual stair/lift core within apartment schemes.</i>	The proposed development includes up to 10 units per core, which is less than the 12 per core allowed under SPPR6 of the 2020 Apartment Guidelines for Build to Sell Apartments (and with no maximum for BTR units under SPPR8).
<b>Objective DMS24</b> <i>Require that new residential units comply with or exceed the minimum standards as set out in Tables 12.1, 12.2 and 12.3.</i>	All units comply with the unit size standards outlined in the 2020 Apartment Guidelines.
<b>Objective DMS25</b> <i>Require that the majority of all apartments in a proposed scheme of 100 or more apartments must exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10%.</i>	Under SPPR8 of the 2020 Apartment Guidelines BTR development are not required to comply with this standard.
<b>Objective DMS27</b> <i>Require that all planning applications for residential development include floor plans for each room indicating typical furniture layouts and door swings.</i>	This is provided for in the drawings and Residential Quality Audit provided by MDO Architects.
<b>Objective DMS28</b> <i>A separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall generally be observed unless alternative provision has been designed to ensure privacy. In residential developments over 3 storeys, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs.</i>	Refer to the MDO Design Statement and associated drawings which demonstrate compliance with this objective.

<p><b>Objective DMS30</b> <i>Ensure all new residential units comply with the recommendations of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (B.R.209, 2011) and B.S. 8206 Lighting for Buildings, Part 2 2008: Code of Practice for Daylighting or other updated relevant documents.</i></p>	<p>A detailed assessment prepared by IN2 Consulting Engineers is included with the application which demonstrates compliance with BRE standards.</p>
<p><b>Objective DMS32</b> <i>Prohibit proposals that would create a gated community for any new residential developments.</i></p>	<p>The main access to the apartments are through the main entrances to Block A and Block B off the public street. To the south of Block A an existing laneway is retained, which is proposed to be gated to provide privacy and security to residents.</p>
<p><b>Objective DMS33</b> <i>Require properly constituted management companies in apartment type schemes are set up and necessary management structures are put in place for the benefit of the residents.</i></p>	<p>This will be provided for with the proposed development as detailed in the Property Management Strategy Report prepared by Aramark.</p>
<p><b>Objective DMS34</b> <i>Provide in high density apartment type schemes in excess of 100 units facilities for the communal use of residents as deemed appropriate by the Council.</i></p>	<p>The proposed development includes for Resident Support Facilities/Resident Services and Amenities totalling 217 sq.m.</p>
<p><b>Objective DMS35</b> <i>Require the provision of communal laundry rooms and storage facilities in high density apartment type developments where deemed appropriate.</i></p>	<p>Each unit will be provided with a kitchen that will include a washing machine and dryer. A separate communal laundry room is not considered necessary.</p>
<p><b>Objective DMS36</b> <i>Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequate screened alcoves or other such mitigation measures are provided.</i></p>	<p>Refer to the MDO drawings which indicate a dedicated bin store rooms to serve the development. Also refer to the Operational Waste Management Plan prepared by Traynor Environmental.</p>
<p><b>Objective DMS39</b> <i>New infill development shall respect the height and massing of existing residential units. Infill development shall retain the physical character of the area including features such as boundary walls, pillars, gates/gateways, trees, landscaping, and fencing or railings.</i></p>	<p>On this basis that this could be considered a large infill site, then the height and massing proposed would be greater than in existing dwellings in the area. However this policy must be considered in tandem with other Development Plan, RSES, NPF and S28 Ministerial Guidelines with respect to the promotion of increased density and height at central, brownfield sites close to public transport and services.</p>



<p><b>Objective DMS75</b> <i>Provide appropriately scaled children's playground facilities within residential development. Playground facilities shall be provided at a rate of 4 sq.m m per residential unit. All residential schemes in excess of 50 units shall incorporate playground facilities clearly delineated on the planning application drawings and demarcated and built, where feasible and appropriate, in advance of the sale of any units.</i></p>	<p>Children's play area is designed into the central courtyard and is described in detail in the Landscape Strategy by CSR. However the area of playground is less than the 4sq.m per unit standard.</p> <p>It is noted that the development is located within 100m of an existing playground at Quay Street and within 650m of the new playground at the Bandstand.</p>
<p><b>Objective DMS76</b> <i>Ensure that in the instance of an equipped playground being included as part of a specific facility, it shall occupy an area of no less than 0.02 hectares. A minimum of one piece of play equipment shall be provided for every 50 sq.m m of playground.</i></p>	
<p><b>Objective DMS85</b> <i>Ensure private open spaces for all residential unit types are not unduly overshadowed.</i></p>	<p>This is provided for outlined in the Daylight and Sunlight Study by IN2.</p>
<p><b>Objective DMS86</b> <i>Ensure boundary treatment associated with private open spaces for all residential unit types is designed to protect residential amenity and visual amenity.</i></p>	<p>This is provided for as detailed on the drawings and Design Statement prepared by MDO Architects.</p>
<p><b>Objective DMS89</b> <i>Require private balconies, roof terraces or winter gardens for all apartments and duplexes comply with or exceed the minimum standards set out in Table 12.6.</i></p>	<p>These standards comply with those in the 2020 Apartment Guidelines which the proposed design conforms to.</p>
<p><b>Objective DMS90</b> <i>Require balconies, ground floor private open space, roof terraces or winter gardens be suitably screened in a manner complimenting the design of the building so as to provide an adequate level of privacy and shelter for residents.</i></p>	<p>This is provided for as detailed on the drawings and Design Statement prepared by MDO Architects.</p>
<p><b>Objective DMS91</b> <i>Require communal amenity space within apartment developments, in the form of semiprivate zones such as secluded retreats and sitting out areas, complies with or exceeds the minimum standards set out in Table 12.6.</i></p>	<p>These standards comply with those in the 2020 Apartment Guidelines which the proposed design conforms to.</p>
<p><b>Objective DMS92</b> <i>Permit in appropriate layouts (e.g. courtyard layouts) the provision of a combination of private and semi-private open spaces</i></p>	<p>Private and communal open space is separately provided for in this current proposal, and to standard.</p>



## CONCLUDING REMARKS

This statement has demonstrated the compliance of the proposed development with the following:

- *Ireland 2040 Our Plan - National Planning Framework (2018);*
- *Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)*
- *Regional Spatial and Economic Strategy (2019- 2031);*
- *Guidelines for Planning Authorities on Urban Development and Building Heights (2018);*
- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;*
- *Quality Housing for Sustainable Communities (2007);*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2020);*
- *Design Manual for Urban Roads and Streets (2019);*
- *Guidelines for Planning Authorities on Childcare Facilities (2001);*
- *Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;*
- *Smarter Travel – A New Transport Policy for Ireland (2009-2020);*
- *Transport Strategy for the Greater Dublin Area (2016-2035)*
- *The Planning System and Flood Risk Management (2009);*
- *Fingal County Development Plan, 2017-2023*

The proposed development is in compliance with the policies and provisions of the area including the land use zoning, density, design standards for residential schemes, streets and open spaces. In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines.