

**STATEMENT OF RESPONSE TO OPINION FROM AN BORD
PLEANALA**

FOR A

STRATEGIC HOUSING DEVELOPMENT

AT

‘TEMPLAR PLACE’

FORMER MALL SHOPPING CENTRE

QUAY STREET & HIGH STREET

BALBRIGGAN

CO. DUBLIN

PREPARED BY



ON BEHALF OF

RHONELLEN DEVELOPMENTS LTD.

August 2021

INTRODUCTION

We, McGill Planning Ltd, are instructed to prepare this Statement of Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion on behalf of our client Rhonellen Developments Ltd.

The Strategic Housing Development (SHD) will consist of 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.

This response has been prepared with direct inputs from the design team who include McGill Planning, McCauley Daye O' Connell Architects; Cunnane Stratton Reynolds Landscape Architecture; IN2 Engineering; Molloy & Associates Conservation Architects; ORS Engineering Consultants; Varming Consulting Engineers; Traynor Environmental Consultants; Whitehall Environmental Consultants and Brian Keeley. This report aims to deliver an overview of the response to all matters raised in the opinion issued under ABP – 308916-20.

A Section 5 Pre-Planning Consultation Meeting was held with An Bord Pleanála on the 7th of May 2021. Following on from this An Bord Pleanála issued a Record of Meeting, Inspectors Report on Recommended Opinion and Notice of Pre-Application Consultation Opinion, dated the 13th of May under reg. ref. ABP-308916-20, which stated that it is *of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.*

The Board identified the following issues which need to be addressed in the documents so that they could result in them constituting a reasonable basis for an application for strategic housing development. These are as follows:

Height and Design

- 1. While the site may be considered suitable for high density development and may be able to absorb height and taller elements within it, the documents require further consideration and/or justification as they relate to the scale, bulk and mass of the building relating specifically to the visual impact on Quay Street and High Street and on the receiving environment of the Harbour Area, all of which are within Balbriggan ACA. The further consideration of these issues may require an amendment of the documents and/or design proposal submitted.***

Public Realm

2. Further consideration/justification of the documents in relation to the public realm along Quay Street and maximisation of opportunities for activity at street level.

The Board also identified pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, and in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information set out below should be submitted with any application for permission.

- 1. Further consideration/justification of the documents in relation to sunlight, daylight and overshadowing, including impacts on neighbouring properties, as well as internally within the proposed development.**
- 2. Documentation to clearly indicate details of public realm improvements proposed to Quay Street, including consideration of consistent footpath widths at this location, in conjunction with PA plans in this regard. Details in relation to public realm improvements along High Street are also required.**
- 3. Further consideration/justification in relation to the Flood Risk Assessment and SUDS measures proposed.**
- 4. Detailed drawings, cross-sections, elevations and additional CGIs of the site to demonstrate that the development provides an appropriate interface with the adjoining lands and provides for a quality public realm. Additional photomontages/CGI's should include views showing trees when they are not in leaf.**
- 5. Details of the proposed materials and finishes to the scheme. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.**
- 6. Justification and analysis in relation to type of Resident Support Facilities and Resident Services and Amenities being provided and scale of such uses.**
- 7. Ecological Impact Assessment.**
- 8. Wind micro-climate study, including analysis of balconies and any upper level roof gardens.**
- 9. Mobility Management Plan.**
- 10. A detailed Construction Environmental Management Plan.**
- 11. A detailed schedule of accommodation which shall indicate compliance with relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2020, including its specific planning policy requirements.**
- 12. A building life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban housing: Design Standards for New Apartments (2020). The report should have regard to the long term management and maintenance of the proposed development.**

- 13. Response to issues raised by the Parks and Green Infrastructure Division (dated 15.01.21), Transportation Planning Section (dated 19.01.21), Water Services Division (dated 20.01.21) and Conservation Officer Section (dated 11.01.21) of FCC, as per the reports submitted in Appendix 3 of the Planning Authority Report, received on 27th January 2021.**
- 14. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.**
- 15. An Appropriate Assessment screening report and/or Natura Impact Statement.**

In addition, the opinion identifies that the applicant shall notify the following authorities in the event of making a planning application:

- 1. Irish Water**
- 2. Transport Infrastructure Ireland**
- 3. National Transport Authority**
- 4. Minister for Housing, Local Government and Heritage**
- 5. Heritage Council**
- 6. An Taisce**
- 7. Fingal Childcare Committee**

We can confirm that the prescribed bodies identified by An Bord Pleanála have been notified and a full copy of the planning application under consideration has been furnished to these bodies. It is worth noting that all of these prescribed bodies requested a soft copy only be sent to them.

ISSUES TO BE ADDRESSED

To address the issues raised, some alterations have been made to the proposed development from that submitted for pre-planning.

In particular we note the following:

- The height of Block A facing Quay Street, has been reduced from 7 storeys to 6 storeys with the top two storeys set back so the building reads as a 4 storey shoulder height along the street.
- The height of Block B facing High Street is 5 storeys and the overall height has been reduced by 150 mm. Block B has a 3 storey street shoulder frontage to the street with two upper floors significantly set back.
- Residential units have been omitted from the ground floor of Block A along Quay Street and replaced with two retail units, and Resident Support Facilities/Resident Services and Amenities. The variety of uses will ensure an active street frontage and passive surveillance on to Quay Street throughout the day and in the evenings. Block C, facing the communal courtyard, which previously contained the Resident Support Facilities/Resident Services and Amenities, now provides 4 apartments.
- As a result of the above, the total number of residential units proposed has reduced from 109 to 101.
- The elevation design and materials have been reconsidered particularly along Quay Street (with the small forecourt removed) so that a better urban grain is achieved.
- The vehicular entrance to the revised car park (now single storey and at ground floor below the communal open space) has been relocated from High Street to Quay Street with the parking provision now 25 spaces to serve the 101 BTR units. The parking provision is considered suitable for this BTR scheme at this town centre location, close to employment, social infrastructure and multiple public transport services including Balbriggan train station. 182 secure bicycle parking spaces (1.8 per unit) are also proposed.

The applicant's response to the issues raised by An Bord Pleanála are set out below:

Issue 1: Height and Design

While the site may be considered suitable for high density development and may be able to absorb height and taller elements within it, the documents require further consideration and/or justification as they relate to the scale, bulk and mass of the building relating specifically to the visual impact on Quay Street and High Street and on the receiving environment of the Harbour Area, all of which are within Balbriggan ACA. The further consideration of these issues may require an amendment of the documents and/or design proposal submitted.

Applicants Response:

As noted above, following the Stage 2 consultation and ABP opinion a number of changes were made to the proposal to reduce the scale, bulk and massing of the buildings in order to improve the visual impact and the relationship to the receiving environment within the ACA and Harbour Area.

The response of MDO Architects (page 45 of the Design Statement) is noted:

“The height of Block A, which faces Quay Street, has been reduced from the previously proposed 7 storeys to 6 storeys to minimise the visual impact of the building on the

environment of the Harbour Area. The form of the block is broken down through a series of significant set-backs to the north-east and north-west, stepping down from 6 storeys to 4 storeys at the shoulder height. The use of carefully chosen lightweight materials on the upper floors, light grey metal cladding for the set back 5th floor and curtain walling with a combination of glass and spandrel for the recessed 6th floor, aid in breaking down the scale and massing of the block. The use of curtain walling on the top floor will provide reflections of the sky and diminish the visual impact of this level when viewed from a distance. The elevations of the lower floors of Block A, facing onto Quay Street, are vertically divided to resemble a series of 4 storey town homes. This is achieved by alternating the use of two-tone buff brick and coloured render, with separations between materials created either through shadow gaps or deeper recesses in the facade, in order to create a dynamic street frontage.

The height of Block B facing High Street is 5 storeys and the overall height has been reduced by 150 mm. A similar approach has been taken to Block A in breaking down the bulk and massing of Block B both horizontally and vertically. Block B has been designed to compliment the existing architecture on High Street. The height of the neighbouring apartment building to the south is three storeys with a set back 4th storey penthouse level. Similarly, it is proposed for Block B to have a 3 storey street frontage with two upper significantly set back levels to the North, East and West to minimise the visual impact of the building on the street and on distant views from the Harbour. The use of predominantly red brick for the lower 3 storeys has been chosen to be in keeping with the existing character of the street, with many of the neighbouring buildings being redbrick. The introduction of white render to the central bay of the building in combination with the use of recessed balconies works to vertically break down the scale of the building and provide a visually interesting street facade.”

These alterations were made in liaison with Molloy & Associates, Conservation Architects, who have worked closely with MDO Architects, CSR Landscape Architects and D3D Geomatics, from the outset to arrive at a design proposal which provides for the 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.

We also refer to the Architectural Heritage Impact Assessment submitted which outlines how the revised design addresses the concerns raised by FCC Conservation to the original Stage 2 proposal:

“In response to the Conservation Officer’s comments, the height of Block A, on Quay Street has been reduced to six-storeys creating an effective shoulder height of 4 storeys onto Quay Street, with two recessed floors above.

The massing of the building is broken down through the use of a number of architectural design treatments. The narrow, historic plots evident within the ACA are articulated through the alternating use of different materials, which emulate the pattern of a traditional street front. The built form is further broken down through the introduction of a series of vertical setbacks, to reinforce the verticality and add visual interest across the façade. Furthermore, the central setback effectively reduces the visual impact on Quay Street by increasing the width of the street on the upper levels to minimise the visual mass and scale of the development on the street, whilst maintaining a strongly defined building line at entrance level.

The pallet of materials of brick and painted render is harmonious with the traditional materials characteristic of the built fabric within the ACA. The contrast emulates a traditional streetscape and has the effect of visually reducing the massing of the buildings into a series of

smaller elements. The upper floors have generous setbacks and upper volumes are stepped back and forth to create visual rhythm and interest. The balconies are recessed to avoid visually cluttering the streetscape and to bring depth to the façade.

On High Street it is considered that the architectural form is compatible with the form and scale of recent development trends and visually relate in scale and form to the adjacent Harbour View apartment block. Block B is three storeys, with two recessed floors above. The higher parts of the proposal are set back significantly from the street and the stepping down of the form towards the northern gable presents a logical response to resolving the transition in scale to the 19th century single-storey dwellings, providing a physical and visual separation between the two entities.

The street elevation on High Street is articulated to emulate traditional plot widths to harmonise with the established grain of the streetscape. The change in material from brick to render emphasises the variation and this elevational treatment is also employed on the gable to visually reduce the impact of the overall depth of the building form.”

“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. The long-range views, depicted in the verified CGIs submitted with this application, show that the height of the proposed development will have a minor impact on the existing skyline but that it is not intrusive.

The use of high-quality materials which integrate well with the existing built environment is a mitigating factor. The materiality of the upper floors changes from the solidity of brick on the lower levels, which relate to the streetscapes, to a lighter, more reflective quality through the use of pressed metal cladding and glazing system. This has the visual effect of softening the impact of the upper floors when viewed from a distance at it merges with the rear of the existing buildings in the town centre.

Consideration has been given to the views from the coast and railway aqueduct, a protected structure, to the north-east of the site. The view of the gable of the building on Quay Street, which is the predominant element as viewed from this aspect, is favourable relative to the existing situation. All elevations, including the gables, have been well-considered and the vertical emphasis and rhythm of the façades relate to the traditional buildings in an appropriately contemporary manner. The use of two different materials on the northern gable of Block B on the High Street building, brick on the front element and render to the rear, has the effect of visually reducing the scale and depth of the building to favourably relate to the 19th century brick residences adjacent.

It is recognised that the proposed redevelopment, which is a distinct, contemporary building and larger in scale relative to the existing buildings on the site, will alter the present setting, but this is not adverse in terms of the character of the ACA. The proposal delivers improved street frontages to the benefit of the urban realm and constitutes 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.”

In conclusion, we refer to Section 2.8 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and note that the current application includes a comprehensive

assessment of the existing character and setting of this historic town centre setting and establishes the sensitivities of the place.

The design statements submitted address the impact on the historic built environment and confirm that there is capacity and opportunity to accommodate the development proposed on this long standing vacant, brownfield site in the heart of Balbriggan town centre.

Furthermore, the design brought forward for planning includes a number of significant, material changes in terms of height, design, streetscape, elevational treatment and materiality to address the concerns raised in Issue #1 and which results in a scheme which provides for the optimum redevelopment of the site with due regard to the historic and visual setting.

Issue 2: Public Realm

Further consideration/justification of the documents in relation to the public realm along Quay Street and maximisation of opportunities for activity at street level.

Applicants Response:

As outlined in the MDO Design Statement, the public realm along Quay Street has been reconsidered, taking into account the requirement for activation at street level.

Level entry has been provided into Block A from Quay Street. The building's main entrance was previously located on a small forecourt; however this has now been removed, with entry directly from the boundary to the street in order to provide a greater level of street activation and safety.

Previously it had been proposed to provide residential units at ground level, however these have been raised to first floor level with a number of active uses proposed along the ground floor of Block A. These will take the form of two small retail units and shared residential amenities spaces.

The residents of the development will benefit from a gym, lounge, co-working spaces, meeting room, library and indoor playroom. The variety of uses will ensure an active street frontage and passive surveillance on to Quay Street throughout the day and in the evenings.

The building elevation will provide enclosure to Quay Street, presenting a well-considered and proportioned façade in brickwork, render and contemporary materials complementing the local urban grain and patterns, and defining a new quality streetscape.

As per the proposal submitted by CSR Landscape Architects, footpath upgrades along Quay Street are proposed with high quality materials included.

In relation to the wider Quay Street area, it was noted at the Stage 2 pre-planning meeting that FCC has commissioned a Public Realm Improvement Strategy for which significant public funding has recently been confirmed. However the FCC design remains at a nascent stage, and the potential to liaise with FCC and the appointed consultants on its plans could not be facilitated. It was therefore not possible, or practicable to extend the application boundary to include for broader upgrades to Quay Street given these are being delivered separately and presently by FCC itself.

Nevertheless CSR have a proposed landscape design within the application site that responds positively and complements the conceptual designs made publicly available to date.

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 suitable 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 will not be possible on the southern side of Quay Street given the extent of existing services although these could be accommodated along the northern side as part of the future FCC design.

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 by FCC for the public areas / streets in due course. The current proposal does not prejudice this potential and which can be appropriately conditioned under a grant of permission.

SPECIFIC INFORMATION TO BE PROVIDED

The Board also requested, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, that *in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:*

Item 1: Sunlight, Daylight and Overshadowing

Further consideration/justification of the documents in relation to sunlight, daylight and overshadowing, including impacts on neighbouring properties, as well as internally within the proposed development.

Applicants Response:

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

- The communal amenity space will be compliant with the guidelines with 84% achieving at least two hours of sunlight over 50%+ on 21st March.
- None of the neighbouring gardens to the north are negatively impacted by the proposed development with all achieving at least two hours of sunlight over 50%+ of the garden area on 21st March.
- Of all of the neighbouring dwellings along Quay Street and High Street only one (on High Street) showed a minor impact in terms of Vertical Sky Component (VSC) (result was 74% just below the 80% threshold). This minor impact in the potential for daylight is offset by the wider planning benefits of redevelopment of this unsightly and vacant brownfield site and rejuvenation and animation of the street which will significantly benefit residents of said property.
- Received sunlight to relevant Quay Street units will not be adversely affected by the proposed new development as Annual Probable Sunlight Hours (APSH) will remain above 25% and Winter Probable Sunlight Hours (WPSH) will remain above 5%.

- In terms of Average Daylight Factors (ADF's) 97% of Living/ Dining and Bedrooms (totalling 221 of 228 rooms) assessed within the proposed development were determined to be compliant based on the following BS.8206-2: 7 standard of > 1.5% for Living/ Dining Areas, and > 1.0% for Bedrooms. 50% of the living spaces achieved an ADF in excess of 3%, and over 85% achieved 2.0%.

Item 2: Public Realm Improvements

Documentation to clearly indicate details of public realm improvements proposed to Quay Street, including consideration of consistent footpath widths at this location, in conjunction with PA plans in this regard. Details in relation to public realm improvements along High Street are also required.

Applicants Response:

Please refer to the Site Layout Plan prepared by MDO Architects, and the Landscape Masterplan, associated drawings, and Design Rationale prepared by CSR Landscape Architects.

As noted, in the response to Issue 2 above, the Public Realm Improvement Strategy for the wider Quay Street area is being pursued by FCC. However the design remains at an early stage, we understand. It was therefore not possible to extend the application boundary to include for potential broader upgrades to Quay Street given that these are being delivered separately by FCC.

Nevertheless, the proposed public realm improvement along Quay Street immediate to the site, complements what is understood to be the emerging design for the broader street. Furthermore, these proposals can naturally be adjusted to reflect the final styles and materials decided by FCC for the public areas / streets in due course and the current proposal does not prejudice this potential and an appropriately worded condition can be applied to a grant of permission.

Item 3: Flood Risk Assessment/SuDs

Further consideration/justification in relation to the Flood Risk Assessment and SUDS measures proposed.

Applicants Response:

Please refer to the Floodrisk Assessment 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 by any of the modelled flood events, therefore, are suitable for the development of residential and commercial buildings.

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.

To reduce and attenuate the flow, the proposed development has been designed in accordance with the principles of Sustainable Urban Drainage Systems (SUDS).

Interception storage for the development will be provided by the planting on the green and blue roofs which totals approximately 1,350 m² and the landscaped areas of the podium totalling approximately 500m².

In addition, the paved areas of the ground floor courtyard to the southwest of Block A will be constructed with permeable paving.

Further details on the SUDS measures are outlined in the Civil Planning Report prepared by ORS Consulting Engineers.

Item 4: Drawings and CGI's

Detailed drawings, cross-sections, elevations and additional CGIs of the site to demonstrate that the development provides an appropriate interface with the adjoining lands and provides for a quality public realm. Additional photomontages/CGIs should include views showing trees when they are not in leaf.

Applicants Response:

Please refer to the drawings and visualisations prepared by MDO Architects, CSR Landscape Architects and D3D Geomatics which demonstrate the relationship of the proposed development to adjoining lands and the public realm improvements. Relevant additional photomontages showing existing trees not in leaf are also included.

Item 5: Materials and Finishes

Details of the proposed materials and finishes to the scheme. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.

Applicants Response:

Please refer to Chapter 13 of the Architectural Design Statement prepared by MDO Architects which details the materials and finishes proposed.

Item 6: Residential Support Facilities

Justification and analysis in relation to type of Resident Support Facilities and Resident Services and Amenities being provided and scale of such uses.

Applicants Response:

Please refer to the Property Management Strategy Report prepared by Aramark.

Item 7: EIA

Ecological Impact Assessment.

Applicants Response:

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.

With the recommended mitigation measures, it is concluded that the proposed development 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.

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.

Item 8: Wind Micro-Climate Study

Wind micro-climate study, including analysis of balconies and any upper level roof gardens.

Applicants Response:

Please refer to the Microclimatic Wind Analysis and Pedestrian Comfort Report. 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".

Item 9: Mobility

Mobility Management Plan

Applicants Response:

Please refer to the Mobility Management Plan prepared by ORS Consulting Engineers. This SHD is proposed as a Build to Rent (BTR) scheme, where car parking spaces are minimised or reduced, and the site is located near high quality public transport. The site will provide 25 No. car parking spaces, which will be placed at the ground floor.

Based on a review of the current transport infrastructure available to the proposed site, the current network provides a significant level of connectivity with the town centre, Dublin City Centre, and other towns near Balbriggan, with both the bus and rail services. Walking and cycling within the town are a feasible activity due to the fact that any of these journeys are considered short within the town area.

Item 10: Construction

A detailed Construction Environmental Management Plan.

Applicants Response:

Please refer to the Construction Environmental Management Plan prepared by ORS Consulting Engineers.

Item 11: Schedule of Accommodation

A detailed schedule of accommodation which shall indicate compliance with relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2020, including its specific planning policy requirements.

Applicants Response:

Please refer to the Residential Quality Audit and Architectural Design Statement prepared by MDO Architects. The qualitative policies of the Apartment Guidelines are also reviewed in the Statement of Consistency.

Item 12: Building Life Cycle

A building life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban housing: Design Standards for New Apartments (2020). The report should have regard to the long-term management and maintenance of the proposed development.

Applicants Response:

Please refer to the Building Lifecycle Report prepared by Aramark. The report includes an assessment of long-term running and maintenance costs as they would apply on a per residential unit basis at the time of application, as well as demonstrating what measures have been specifically considered to effectively manage and reduce costs for the benefit of the residents.

Item 13: Planning Authority Report Response

Response to issues raised by the Parks and Green Infrastructure Division (dated 15.01.21), Transportation Planning Section (dated 19.01.21), Water Services Division (dated 20.01.21) and Conservation Officer Section (dated 11.01.21) of FCC, as per the reports submitted in Appendix 3 of the Planning Authority Report, received on 27th January 2021.

Applicants Response:

The issues raised are addressed in the individual reports prepared by CSR Landscape Architects, ORS Consulting Engineers, Varmings Consulting Engineers, JBA Consulting Engineers and Molloy Associates Heritage Consultants.

Item 14: Material Contravention

Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.

Applicants Response:

Please refer to the Material Contravention Statement prepared by McGill Planning Ltd.

Item 15: Appropriate Assessment

An Appropriate Assessment screening report and/or Natura Impact Statement.

Applicants Response:

Please refer to the Statement of Screening for Appropriate Assessment prepared by Whitehill Environmental. The Statement concludes that the proposed development, 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 the ecologist that this application does not need to proceed to Stage II of the Appropriate Assessment process.