

Statement of Consistency with Planning Policy

In respect of proposed housing development at

Hacketstown, Skerries, Co. Dublin.

Prepared by

John Spain Associates

On behalf of

Land Development Agency

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1.0 INTRODUCTION

- 1.1. On behalf of the applicant, the Land Development Agency, 2nd Floor Ashford House Tara Street Dublin 2, we hereby submit this Statement of Consistency with Planning Policy to accompany this strategic housing development application to An Bord Pleanála under Section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended (“the 2016 Act”) in relation to a proposed residential development on lands at Hacketstown, Skerries, Co. Dublin.
- 1.2. In summary, the proposed development consists of 345 no. residential units comprising of 84 no. 1-bed units, 104 no. 2-bed units (68 no. 2-bed apartments and 36 no. 2-bed duplexes), 157 no. 3-bed units (118 no. 3-bed duplexes and 39 no. 3 - bed houses) ranging in height from 2 no. – 4 no. storeys on an overall site of 6.7 ha. The net development area amounts to 6.6 ha. which equates to a residential density of circa. 52 uph. This has been calculated in accordance with Appendix A of the 2009 Sustainable Residential Guidelines. The proposed development will also provide for 1 no. creche facility (377 sqm).
- 1.3. It is noted that the adjoining site to the north (Ballygossan Park Phase 2) is also proposed to be further developed as a residential scheme. The subject site and future proposal on the adjoining lands to the north make up the majority of the now expired Hacketstown Local Area Plan area, and both schemes have been designed to integrate within a common framework plan for these lands. An application for advanced infrastructure was submitted by the Land Development Agency in May 2021 (Reg. Ref. F21A/0287) and is intended to provide infrastructure for both developments including road, open space and surface water drainage. This application was granted by Fingal County Council (FCC) in November 2021 and is currently subject to appeal (ABP-312189-21).
- 1.4. This Statement of Consistency with Planning Policy has been prepared to specifically address the requirements of the 2016 Act, the Planning and Development (Strategic Housing Development) Regulations 2017 and the Guidance for Applicant’s issued by An Bord Pleanála. This Statement demonstrates how the proposed strategic housing development is consistent with National and Regional Planning Policy, relevant Section 28 Guidelines, and the policies and objectives of the Fingal County Development Plan 2017-2023, save as where identified in the Material Contravention Statement In circumstances where the proposed development is considered to materially contravene the Fingal County Development Plan 2017-2023 the Material Contravention Statement sets out how a number of criteria in section 37(2)(b) of the Planning and Development Act 2000, as amended, are met, thereby enabling the Board to grant permission pursuant to the provisions of section 9(6)(c) of the 2016 Act. As demonstrated in this Statement of Consistency the proposed development does not contravene the Fingal County Development Plan 2017-2023 in relation to the zoning of land.
- 1.5. It is noted that the Hacketstown Local Area Plan expired on 9th of February 2019 and consequently is no longer in force. Therefore, the expired Hacketstown LAP has not been considered for the purpose of compiling the Statement of Consistency or for determining whether there is any Material Contravention of the development plan. This consideration has been limited to the objectives of the Fingal County Development Plan 2017-2023.
- 1.6. The statement set out herein demonstrates that the proposed development is consistent with the relevant national, regional and local planning policy. At a national and regional level, this statement has demonstrated consistency with the following Section 28 Guidelines and other national/regional planning policy documents:

- National Planning Framework 2018;
 - Housing for All - A new Housing Plan for Ireland
 - Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities 2020;
 - Urban Development and Building Height Guidelines 2018;
 - Regional Spatial and Economic Strategy – Eastern and Midlands Regional Assembly (2019-2031);
 - 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 (last updated 2019);
 - Guidelines for Planning Authorities on Childcare Facilities (2001);
 - Transport Strategy for the Greater Dublin Area 2016 – 2035
 - Bus Connects
 - The Planning System and Flood Risk Management (2009);
 - Birds and Habitats Directive – Appropriate Assessment.
- 1.7. This Statement of Consistency also includes details in respect of the proposed development in relation to the site location and context, the development description and the relevant planning history.
- 1.8. The development has been subject to a Section 247 pre-application consultation with the Planning Authority (Fingal County Council) in compliance with Section 5 (2) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended. Details of the pre-application meeting are summarised in this report (Appendix 1).
- 1.9. A tripartite pre-application meeting with representatives of the Board and the local Planning Authority was undertaken on the 22nd of July 2020 (ABP Reg. Ref. 308478). The Opinion of An Bord Pleanála issued on the 31st of July 2020. The Board's Opinion stated that having regard to the consultation meeting, the submission of the Planning Authority, and the documentation submitted with the pre-application request, the pre-application request represented a reasonable basis for an application for strategic housing development.
- 1.10. The proposed development is designed in accordance with the national planning policy including the National Planning Framework 2018, Design Standards for New Apartments and the Urban Development and Building Height Guidelines 2018 in addition to the Fingal County Development Plan 2017-2023, save to the extent that material contraventions have been identified.
- 1.11. This standalone planning policy consistency statement, prepared by John Spain Associates, demonstrates that the proposed development is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy, save for the material contraventions which have been identified and in respect of which justification for the grant of permission is demonstrated in the Material Contravention Statement. It should be read in conjunction with the accompanying detailed documentation which are listed in the schedule of documents within JSA's Cover Letter to ABP.
- 1.12. The final design of the proposed development responds to the items of specific information identified within the Board's Opinion on the conclusion of the pre-

application consultation process. In its Opinion, the Board indicated that the proposals represented a reasonable basis for a Strategic Housing Development Application. The accompanying Statement of Response report prepared by John Spain Associates should be referred to for a response to the items of specific information required by the Board. We have also outlined response to the opinion of the Local authority (FCC) in this document. The Statement of Response refers to other documents within the application which provide more detailed responses to particular points where relevant.

- 1.13. This report outlines details of compliance with the quantitative standards for residential units as set down in the Design Standards for New Apartments (2020), and the Fingal County Development Plan for full details of compliance with the Quality Housing for Sustainable Communities please refer to the documentation prepared by O'Mahony Pike Architects.

2.0 SITE LOCATION AND DESCRIPTION

- 2.1. The subject site is located to the south of Skerries town centre in an area known as Hacketstown in the townland of Milverton and Hacketstown, Co. Dublin. The lands are bound to the north by a stream, to the west by the Dublin – Belfast railway line, to the east by Golf Links Road and to the south by agricultural buildings and a number of individual houses.
- 2.2. The lands amount to some 6.7 ha. of greenfield lands. The extent of the landholding is indicated in Figure 1 below.
- 2.3. The site is served by an existing access from the Golf Links Road which links the site to Skerries town centre to the North. The site is within 800m – 1 km (10-15 minutes walk) of Skerries train station.
- 2.4. The lands immediately north of the site, referred to as Ballygossan Park Phase 1 have been recently completed under Reg Ref: F11A/0309/E1. We understand that Ballygossan Park Phase 2 will be subject of a separate LRD application to Fingal County Council.
- 2.5. The subject site is not located within/ near any Architectural Conservation Areas, and there are no protected structures on site. However, the site is located within 1 km of Skerries Islands Special Protection Area which is a Natura 2000 site. There is no Special Amenity Area Order relating to the subject site or in the area. Chapter 5 of the EIAR provides an overview of (Proposed) Natural Heritage area (NHAs) within 15 kms of the site the closest of which is Skerries Islands NHA. The Loughshinny Coast Proposed NHA is located 1.5km distant.
- 2.6. The subject lands are located within the ‘Coastal Character Type’ of the landscape character types under the Green Infrastructure Map 14 within the Fingal Development Plan. This landscape character type forms the eastern boundary of the County and contains a number of important beaches, islands and headlands that together create a landscape of high amenity and landscape value.



Figure 2.1: Subject site approximately outlined in red. (Source Google, Maps,2022)

3.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

3.1. The proposed development will consist of 345 no. residential units comprising of 84 no. 1-bed units, 104 no. 2-bed units (68 no. 2-bed apartments and 36 no. 2-bed duplexes), 157 no. 3-bed units (118 no. 3-bed duplexes and 39 no. 3 - bed houses) ranging in height from 2 no. – 4 no. storeys.

Overall Unit Mix	1 Bed	2 Bed	3 Bed	TOTAL
	84	104	157	345
	24%	30%	46%	

3.2. The proposed development will also include a childcare facility of 377 sq.m.



Figure 3.1: Site Layout (source OMP Architects)

Apartment/Duplex Units

3.3. The proposed development primarily consists of apartment units with 305 no. units of the total 345 no. units being apartments/duplexes. Please see below detailed breakdown of the proposed apartment/duplexes:

- 84 no. 1-bed apartments
- 68 no. 2-bed apartments
- 36 no. 2-bed duplexes
- 118 no. 3-bed duplexes
- 39 no. 3 - bed houses

3.4. Each of the proposed apartments/duplexes are consistent with the relevant standards set out in the Apartment Guidelines. Compliance with these standards will be set out below in Section 5.

Apt. Mix	1 Bed	2 Bed	3 Bed	TOTAL
	84	104	118	306
	27%	34%	39%	

**Inc. Duplex Units*

Houses

3.5. 39 no. 3-bed houses are proposed to the south of the subject site. These houses are set out in 3 no. house types:

- House Type A (Semi-detached 115 sqm)
- House Type B (Mid-terraced 115 sqm)
- House Type C (Semi-detached 115 sqm)

Character Areas

3.6. There are three character areas within the scheme. These include are:

- 1: Parkland
- 2: Shared Gardens
- 3: Avenues and Streets



Figure 3.2 Character Areas (Source: OMP 2022)

Parkland

- 3.7. The northern portion of the development is the primary entrance to the scheme and has been designed to serve a number of functions, including catering for the demands of a vibrant new community and integrating with the existing built fabric. The townhouse units at this location have been carefully developed to provide greater density and variety, in response to the challenging topography and to create a new street at the heart of the scheme which will become the arrival point. Through the creation of this new street they also form a definitive edge to the park and eco corridor north of the proposed development. The four story elements (Blocks A1/A2) at this location are the tallest volumes onsite. All units are dual aspect and will benefit from excellent views across the shared park space to the north and eastward to the sea. Due to the topography these terraces are not imposing and sit naturally within the rolling landscape as evidenced by the sections. These terraces will have a three storey presence to the street.

Shared Gardens

- 3.8. A key feature of the proposed scheme are the Shared Garden Blocks which form a buffer to the railway along the site's western boundary. These spaces offer a higher

sense of security and amenity for the residents of the surrounding townhouses and apartments. At this location they provide a strong buffer to both the elements and the noise of the nearby railway while respecting the vernacular architecture of Ireland's coastal regions. A large shared garden is created by the buildings which offers a retreat to residents from the public open spaces and an extension of their private domain which will become nodes of activity within the community as it evolves.

- 3.9. All units are provided with a private amenity space which exceeds the national standards while the large shared gardens are only accessible via the semi-private entrances to the courtyards. These provide a sense of ownership and security to residents of the courtyards that is rarely found in contemporary high-density communities. They offer excellent passive surveillance and include owndoor access throughout. The nature of these spaces is further explained within the Landscape report prepared by BSLA.

Avenues and Streets

- 3.10. The southern portion of the proposed development is made up of a series of streets containing duplexes and three bed homes. This portion of the subject site sits on a higher elevation, as such the proposed units do not exceed three storeys. Home zones are proposed throughout these avenues to create a safe environment for pedestrians, cyclists and motorists. This area of the site benefits from access via Golf Links Road and excellent views eastward to the sea.
- 3.11. The character proposed for this area which will become the outer reaches of the Hacketstown development and is flanked on both sides by rural development. Clean volumes with pitched roofs and a concise palette of materials are proposed to create a contemporary neighbourhood that takes its cues from the surrounding landscape and agricultural nature of Golf Links Road at this point. The principle of active streetscapes is also applied to this area. All units feature active elevations with primary living spaces overlooking adjacent streets and open spaces to provide passive surveillance and create a safe and secure streetscape for all users.
- 3.12. A childcare facility and Community space are also proposed in this location and will form an active corner within the streetscape. Visitors to the scheme arriving from the north via Ballygossan Park or the north west via the pedestrian link to Skerries Station will be greeted by this prominent corner on entering the scheme which lends itself naturally to public use. The creation of a distinct hierarchy of open spaces and new streets are definitive features of the emerging landscape-led design. Within this a careful balance is proposed between public, communal and private open space.

Height

- 3.13. The proposed development will range in height from 2 no. – 4 no. storeys. The proposed building heights have been designed to take cognisance of both the existing surrounding residential development and the Urban Development and Building Height Guidelines which allow for increased height in appropriate locations.
- 3.14. This Planning Application is accompanied by a LVIA prepared by Modelworks which highlights that *“The proposed development was assessed against the relevant policies and objectives of the FDP. It was found that the development complies with the policy and would achieve a number of key objectives for the site, with no negative impacts on the identified sensitivities. In summary the landscape change can be considered positive.”*

- 3.15. The LVIA concludes that: *“In conclusion, the proposed development would make a significant positive contribution to the evolving neighbourhood of Hacketstown, enhancing the urban landscape and visual amenities of the area”.*

Connectivity and Permeability

- 3.16. The proposed development includes the construction of a new internal link road which will provide vehicular access to the lands to the north. Also, a pedestrian link is proposed to the north east corner of the subject site to increase the permeability of the lands.
- 3.17. A new pedestrian walkway is proposed along the western boundary of the subject site to provide access to the existing walkway to the north west of the subject site. This walkway will provide for accessibility to the Skerries train station and is 850m. walking distance from the norther site boundary. See Figure 3.3 below.



Figure 3.3: Walking distance approximate to Skerries train station (Source: OMP, 2022).

Vehicular Access

- 3.18. The proposed development provides for two number vehicle access points. The main vehicular access is proposed to connect, by way of a slightly elevated connection across to the north central east-west landscaped buffer, with the as-built street network in Ballygossan Park which in turn leads to the existing three-arm priority junction on Golf Links Road This connecting road was subject to a separate application under FCC Reg. Ref.: F21A/0287 and is currently under appeal (ABP-312189-21).. A

supplementary second vehicle access point is also being proposed to the south of the scheme proposals with a new three arm access junction directly between the LDA lands and Golf Links Road. Further details of the internal streets layouts and site access junction is detailed in DBFL drawing 190170-DBFL-RDSP-DR-C-1001. The proposed development will also include upgrades to the Golf Links Road adjacent to the subject site.

- 3.19. It should also be noted that an application was granted by Fingal County Council and An Bord Pleanala (FCC Reg. Ref.: F20A/0324; ABP-309409-21) for improvements to a number of junctions in the vicinity of the subject site. These off-site road works approved by the Board will greatly improve the surrounding road network for all road users and facilitate the proposed development.

Open Space and Landscaping

- 3.20. The landscape strategy can be summarised as follows:
- 3.21. The proposed Public Open Space which is 16,670 sqm in size. The landscape design aims to utilise the existing contours in order to cater for a natural water run-off that supply the main water attenuation areas and enhance the vibe of the landscape by their presence. These areas will be planted and presented as areas that will attract insects. Gradual and attractive slopes designed to provide a useable space can be used for both habitats and as informal amenity. The approach has been coordinated with the adjacent Noonan Construction site to encourages clear landscape connections and mutual visual links as it ensures that a functioning and offering rich in amenity can be maximised to benefit both sides.
- 3.22. The intention of the public square at the centre of the scheme is to provide a place of common use and integration for all future residents as it acts as the heart of development. The play area is located centrally within the square, suitably distanced from the houses while being overlooked by them. Play area provides equipment for all ages and is surrounded by a generous kickabout area. Planting proposed within the development will be in line with National Pollinators Guide for wildlife.
- 3.23. There are two communal courtyards proposed between Block E and Block F 2,272 sqm in size. Both courtyards are designed to have a similar character with the exception that courtyard in Block E is on podium and requires a sensitive approach. The design aims to retain a degree of openness as well as privacy.
- 3.24. The Linear Park which is 2,427 sqm is located along the western boundary of the site. The approach to retain the existing hedgerow and secure its ecological value by proposing new planting alongside. This is not included within the identified public open space.
- 3.25. All the open spaces are connected by a series of pathways forming a coherent landscape strategy and enabling loops of varying length along mown paths, hoggin paths and footpaths. The landscape design for the public realm offers a clear separation between public and private spaces by providing a soft treatment detail to the facades as well as a change of materiality at the threshold of the houses where possible.

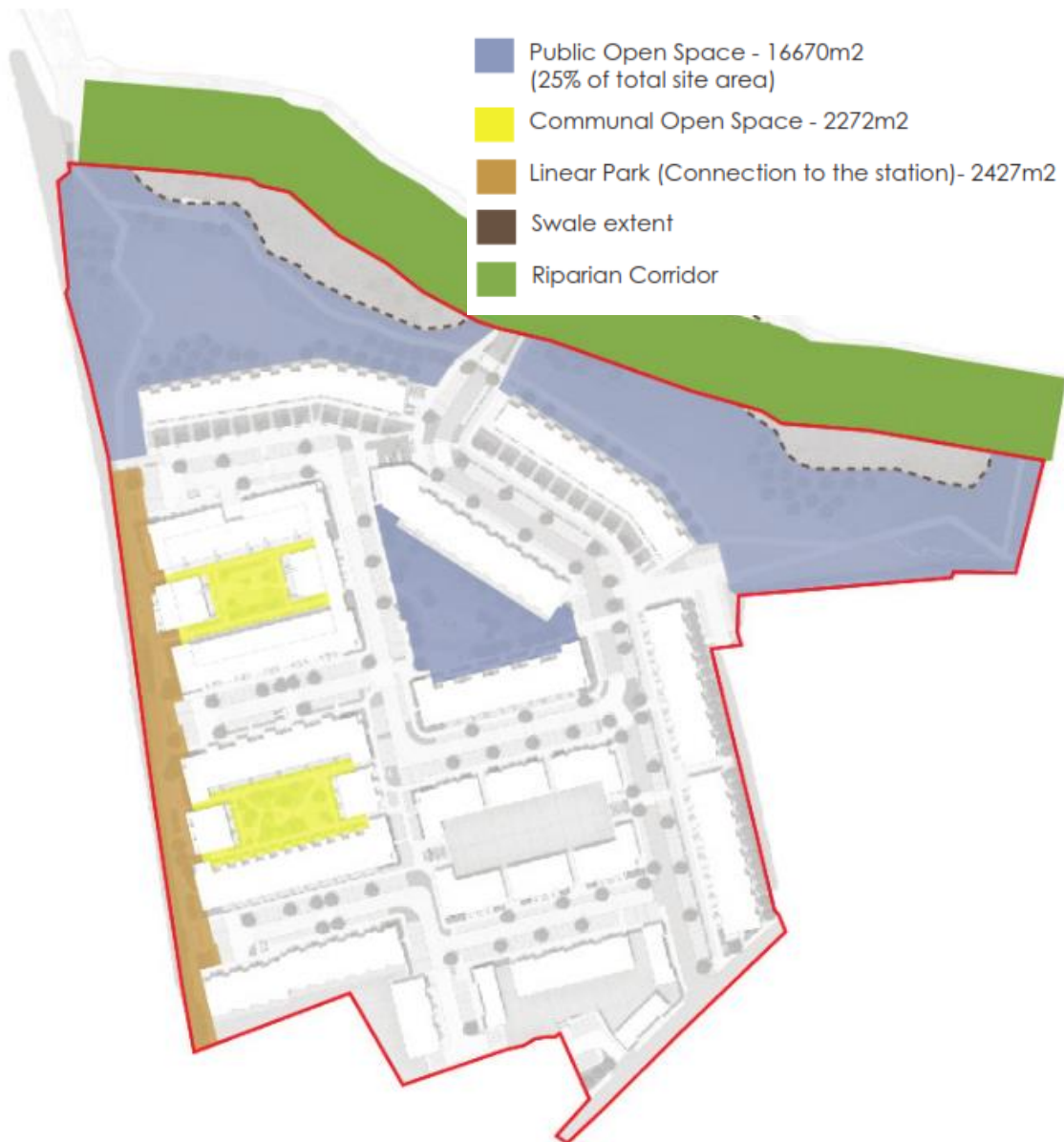


Figure 3.4: Landscape strategy overview (Source: BSLA, 2022).

Pedestrian and Cyclist Access

- 3.26. The proposed development will deliver a number of benefits pedestrians and cycles with a network of dedicated, shared and quiet street linkages integrating with the off-site network to provide attractive, safe and convenient connections to the Skerries urban environment.
- 3.27. A shared north-south bicycle / pedestrian connection will be located along the western boundary of the site while a second greenway (east-west orientation) will be located to the north of the site. This will continue eastwards towards Golf Links Road and could cater as a potential future connection to the reserved school site. The design of the internal streets have in reference to DMURS sought to (i) achieve a balance between the difference movement and place functions, (ii) accommodate all road user requirements, (iii) minimise the use of long straight sections of road carriageway with geometric initiatives introduced at appropriate spacings to actively manage and self-enforce appropriate internal vehicle speeds whilst retaining a legible street network,

and (iii) to provide a positive advantage in terms of travel distance for active modes of travel.

Bicycle and Car Parking Provision

- 3.28. The proposed development provides a total of 414 no. on-site car parking spaces. This level of provision is considered to be appropriate to accommodate the demand for both residents and visitors in accordance with the planning requirements. The proposed development's car parking strategy equates to 1.2 spaces per unit on average. Please refer to the submitted Mobility Management Plan which sets out a robust justification for this level of parking provision.
- 3.29. The proposed 414 no. parking spaces are summarised as follows;
- 368 no. residents spaces comprising:
 - 307 no. standard residential bays,
 - 19 no. disabled bays of which 6 are provided with EV charge points,
 - 42 no standard sized bays with EV charge points
 - 40 no. resident visitor spaces
 - 5 no. creche parking spaces (which can also be used as additional visitor parking at times when the creche is closed e.g. night time and weekends) comprising:
 - 2 no. spaces allocated to staff (and provided with EV charge points) and
 - 3 no. drop-off / set-down spaces.
 - 1 no. Dedicated Car Share (GoCar) bay
- 3.30. The creche unit is allocated 6 no. car parking spaces comprising 3 no. staff spaces and 3 no. drop-off / set-down spaces. The spaces allocated to the staff will be EV integrated.



Figure 3.5: Car Parking allocation by block (Source: DBFL, 2022).

3.31. 802 no. bicycle parking spaces are proposed to serve the development with 128 no. of these bicycle spaces are to serve visitors to the subject site. This provision exceeds the standards in Table 12.8 which are norms rather than maximums and accordingly it is considered compliant with the provisions of the Development Plan. A total of 10 no. cycle spaces will be provided to the creche unit comprising 6 no. ‘short stay’ for parents / visitors and 4 no. ‘long stay’ staff parking.

Block	Bicycle Parking Location							
	LONG TERM							SHORT TERM
	Lower Level	External Hub (Single Tier)	External Hub (Two-Tier)	Podium Level (Two-Tier)	Sheffield Stand (In-curtilage)	Crèche Sheffield Stand (External)	Rear Garden Access (Assumed 2 Bikes per unit)	Sheffield Stand (External)
Block A1	13		20					13
Block A2	11		20					13
Block B1 & B2		32	20		32		8	11
Block C					60			15
Block D			80		28		16	11
Block E			20	80	52		8	22
Block F					108			23
Block G					26		8	9
Block H					12		16	5
Crèche						4		6
Sub-Total (Per Location Type)	24	32	160	80	318	4	56	128
Total Parking (Long-Term)	674							
Total Cycle Parking	802							

Figure 3.6: Cycle Parking allocation by block (Source: DBFL, 2022).

Childcare Facility

3.32. The Section 28 Sustainable Urban Housing; Design Standards for New Apartments; Guidelines for Planning Authorities 2020 states that:

“Notwithstanding the Department’s Planning Guidelines for Childcare Facilities, 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”.

3.33. The proposed development includes a creche facility 377 sqm which is considered to be suitably sized to cater for the future demand for childcare as a result of the proposed development.

Site/Development Statistics

3.34. Please see below table showing a summary of the relevant site/development statistics:

Site Area	6.7 ha
Net Developable Area	6.6 ha
No. Units	345 no. units
Gross Density	52.5 uph
Net Density	52 uph
Building Height	2 - 4 storeys
Plot Ratio	0.46
Dual Aspect	100%
Part V	70 units (20%)
Public Open Space	16,670 sqm (25% of net developable area)
Communal Open Space	2,272 sqm
Car Parking	414 spaces including 40 visitor spaces, 3 creche set down and 2 for creche staff parking
Bicycle Parking	802 spaces (including 120 visitor spaces)

4.0 PLANNING HISTORY

- 4.1. We have undertaken an online search of Fingal County Council's planning system for the subject site. We note a number of applications in the surrounding area which are of relevance to the subject site.

Subject Site

FCC Reg. Ref.: F21A/0287 ABP-312189-21 Golf Links Road & Ballygossan Park, Hacketstown, in the townland of Milverton & Townparks, Skerries, Co Dublin -

- 4.2. An application for advanced infrastructure was submitted 24th May 2021 (Reg. Ref. F21A/0287), subsequently granted by FCC dated 15th December and is currently subject to an appeal to An Bord Pleanála (ABP-312189-21). This proposed development consists of the following:

(1) Construction of a new link road, crossing the Regional Drainage Facility and providing access to the future residential zoned land to the south from the existing Ballygossan Park to the north.

(2) Construction of Regional Drainage Facility (RDF) for the surface water management of the Hacketstown residentially zoned lands.

(3) Foul, Surface Water and Water Supply Services to facilitate future development at Ballygossan Park Phase 2.

(4) Foul, Surface Water and Water Supply Services to facilitate the future development of lands to the south.

(5) Planting and Landscaping of open space areas, including provision of footpaths and viewing point, provision of public lighting on Link Road/Footpaths.

(6) Diversion and undergrounding of existing overhead power lines.

(7) Utilisation of existing field gate on Golf Links Road as a temporary access road for construction traffic.

An Environmental Impact Assessment Report and a Natura Impact Statement have been prepared in respect of the proposed development and accompany this application.

- 4.3. The proposed SHD is closely linked with the proposed Advance Infrastructure works current under Appeal. It is intended to deliver the advance infrastructure as part of the early phases of the project. The LDA are committed to ensuring the requisite infrastructure is provided to serve the future residents and improve the existing condition of this area as such are willing to accept a condition ensuring this infrastructure is constructed in advance of the occupation of any residential unit. .

Surrounding Area

Reg. Ref.: F20A/0324 (ABP-309409-21) - Junctions of Townparks & Holmpatrick, Skerries, Co Dublin

- 4.4. An application was lodged to Fingal County Council by the Land Development Agency on the 08/07/2020 for the following development:

“Permission for reconstruction of the Miller's Lane/Shenick Road/Golf Links Road junction to provide for a four armed mini roundabout; Upgrading and extension of the two-lane flared approach to the junction on both the northern (Dublin Road) and south-eastern (Miller's Lane) arms of the existing three-arm roundabout junction; The provision of Zebra Crossing facilities on all arms of both junctions; The implementation of flat top calming ramps on all arms of both junctions (approximately 5m back from the roundabouts circulating carriageway); New street lighting system covering both

junctions; The proposed development also includes upgrades to the junction of Downside Heights/Golf Links Road and a new cycle path along the Golf Links Road; New footpaths, cycle and pedestrian facilities, road gully's, road marking, signal and carriageway surfacing works; All ancillary site development works, landscaping and signage to support the development at the following junctions in Townparks and Holmpatrick, Skerries, Co Dublin: Miller's Lane/Shenick Road/Golf Links Road junction R127 Skerries Road/Miller's Lane/Dublin Road Roundabout, Downside Heights/Golf Links Road junction (and a section of the Golf Links Road)".

- 4.5. Following Further Information requested this application was granted by FCC, decision dated 15 Jan 2021; and by ABP following Third Party Appeal dated 19/07/2021.

Reg. Ref.: F11A/0309 & PL.06F.240639 - Lands immediately north of the site (referred to as 'Ballygossan Park Phase 1')

- 4.6. *"The development will consist of the construction of 103 no. dwelling houses, 1 no. 2 - storey creche (455 sqm.) and all associated and ancillary site developments. Breakdown of houses: 7 no. house type A (3 bedroom, 1.5 storey, 106.4sqm.); 5 no. house type A1 (4 bedroom 1.5 storey, 131.2sqm.); 4 No. house type A2 (4 bedroom, 1.5 storey, 130.5sqm.); 8 no. house type B (4 bedroom, 2 storey, 139.8sqm.); 8 no. house type C (3 bedroom, 2 storey, 112sqm.); 11 no. house type P (3 bedroom, 2 storey, 100sq.m.); 5 no. house type P1(3 bedroom, 2 storey, 119.9 sqm.); 2 no. house type P2 (3 bedroom, 2 storey, 121sqm.); 3 No. house type E with terrace (4 bedroom, 3 storey, 149.9sqm.); 1 no. house type E1 with terrace (4 bedroom, 3 storey, 150.7sqm.); 1 no. house type E2 with terrace (4 bedroom, 3 storey, 148.4 sqm.); 2 no. house type F with garage and terrace (4 bedroom, 3 storey, 155.2sqm.); 1 no. house type F1 with garage and terrace (4 bedroom, 3 storey, 175.7sqm.); 8 no. house type G (3 bedroom, 2 storey, 105.7sqm.); 6 no. house type H with terrace (3 bedroom, 2 storey, 110.9sqm.); 7 no. house type J (3 bedroom, 2 storey, 112.5sqm.); 6 no. house type K (2 bedroom, 2 storey, 87.7sqm.); 8 no. house type L (3 bedroom, 2 storey, 95.2sqm.); 1 no. house type L1 (3 bedroom, 2 storey, 97sqm.); 1 no. house type L2 (3 bedroom, 2 storey, 97sqm.); 4 no. house type M (4 bedroom, Part 2 & Part 3 storey, 132.2sqm.); 4 no. house type N (4 bedroom, 3 storey, 140.4 sqm.)".*
- 4.7. Fingal County Council issued a decision to grant permission for the above development on the 27th of April 2012. Subsequently, an appeal was lodged on 24th of May 2012 and an order to grant permission was made by An Bord Pleanala on 27th March 2013.
- 4.8. Extract from the ABP Order below:

"Having regard to its residential zoning in the Fingal County Council Development Plan 2011-2017 and its location adjacent to an area characterised by relatively low density housing, to the quality of design, layout and housing mix, which forms part of Phase 1 of an overall scheme that is in general conformity with the Hacketstown Skerries Local Area Plan and a masterplan for the area, it is considered that, the proposed development would provide an adequate level of residential amenity that would not seriously injure the amenities of property in the vicinity, would be acceptable in terms of traffic safety and convenience, would accord with the overall pattern of development in the vicinity and would, therefore be in accordance with the proper planning and sustainable development of the area".

Reg. Ref.: F11A/0309/E1 - Lands immediately north of the site

- 4.9. Fingal County Council granted an extension of duration of permission of previously permitted permission under Reg. Ref. F11A/0309 on the 5th of February 2018. The

duration of permission was extended up to and including the 9th May 2023. This development has now been largely completed.

5.0 NATIONAL AND REGIONAL PLANNING CONTEXT

- 5.1. The key provisions of national planning policy, including relevant Section 28 guidelines, and regional planning policy as it relates to the proposed development is set out in the following sections. The key policy documents of relevance to the proposed development are as follows:
- National Planning Framework (NPF) 2018;
 - Housing for All - A new Housing Plan for Ireland;
 - Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities 2020;
 - Urban Development and Building Height Guidelines (2018);
 - Regional Spatial and Economic Strategies – Eastern and Midland Regional Assembly (2019-2031);
 - Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual – A Best Practice Guide;
 - Design Manual for Urban Roads and Streets (2013);
 - Guidelines for Planning Authorities on Childcare Facilities (2001);
 - Transport Strategy for the Greater Dublin Area 2016 - 2035
 - BusConnects – Transforming City Bus Services (2018);
 - The Planning System and Flood Risk Management (2009);
 - Quality Housing for Sustainable Communities (2007);
 - Birds & Habitats Directive – Appropriate Assessment.
- 5.2. When considering an application for strategic housing development, the Board is required under section 9(2)(b) of the 2016 Act to have regard to any section 28 guidelines and is required under section 9(3)(a) to apply, where relevant, specific planning policy requirements of guidelines issued by the Minister under section 28 of the Act of 2000.

National Planning Framework (NPF) 2018

- 5.3. The National Planning Framework is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.
- 5.4. As a strategic development framework, Ireland 2040 sets the long-term context for our country's physical development and associated progress in economic, social and environmental terms and in an island, European and global context.
- 5.5. National investment planning, the sectoral investment and policy frameworks of departments, agencies and the local government process will be guided by these strategic outcomes in relation to the practical implementation of Ireland 2040. The NPF sets out the importance of development within existing urban areas by *"making better use of under-utilised land including 'infill' and 'brownfield' and publicly owned sites together with higher housing and job densities, better services by existing facilities and public transport"*.
- 5.6. The proposed development will utilise a publicly owned site through the provision of a residential development at a sustainable density relative to existing facilities and public transport, thus supporting the above intention.
- 5.7. Objective 3a of the NPF states that it is a national policy objective to *"Deliver at least 40% of all new homes nationally, within the built-up footprint of existing urban settlements"*. The proposed development is a strategically located underutilised site

within close proximity to Skerries train station. The proposed development is therefore compliant with the objective of the NPF.

- 5.8. Objective 4 states “*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*”. The proposed development will provide for a high quality of residential units in accordance with the guidelines on Sustainable Residential Development in Urban Areas (2009). The proposed materials and finishes will also be of a high quality standard in order to create a unique quality of urban place.
- 5.9. It is considered that the proposed development provides for the creation of an attractive, high quality, sustainable new development within existing built up urban area. The provision of the new sustainable development is therefore consistent with the NPF objective.
- 5.10. Objective 11 of the National Planning Framework states that “*there will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth*”.
- 5.11. The proposed development will provide for residential development with a density of c. 52 uph on site within the development boundary of Skerries within close proximity to both Skerries town centre and Skerries train station. Therefore the proposed development supports the development and growth of Skerries through within the Fingal and will help meet appropriate planning standards and achieving targeted growth as identified in the Fingal Development Plan

Housing for All - A new Housing Plan for Ireland

- 5.12. Launched in September 2021, ‘Housing for All, A new Housing Plan for Ireland’ is the Government’s new plan (superseding ‘Rebuilding Ireland’) to boost the supply of housing to 2030; to increase availability and affordability of housing; and to create a sustainable housing system into the future.
- 5.13. The aim of the plan is that: everyone should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life.
- 5.14. The plan contains a range of actions and measures to ensure over 300,000 new social, affordable, cost rental and private homes are built by 2030. The actions outlined in the Plan are backed by over €4 billion in annual guaranteed State investment in housing over the coming years, including through Exchequer funding, the Land Development Agency and Housing Finance Agency investment. The plan commits to over €20 billion in State investment in housing over the next five years. The plan is set out across four pathways to address the pressing housing challenges facing the State:
- *“Pathway to supporting homeownership and increasing affordability*
 - *Pathway to eradicating homelessness, increasing social housing delivery and supporting social inclusion*
 - *Pathway to increasing new housing supply*
 - *Pathway to addressing vacancy and efficient use of existing stock”*
- 5.15. These pathways are underpinned by long-term actions to address systemic challenges. It aims to create a housing system which has environmental, social and economic sustainability at its heart and which meets the needs of all.

- 5.16. The proposed development will support the achievement of this Plan by delivering housing at an appropriate scale and location including social and affordable housing. While the full detail of this plan has yet to be fully developed, this application is in accordance with the intention and ambition of the plan.

Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities 2020;

- 5.17. The Sustainable Urban Housing Design Standards for New Apartments were published in 2018 and further updated in December 2020 to account for a changing policy approach in relation to Co-living developments. The guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.

- 5.18. A key inclusion in the guidelines is the acknowledgement of the importance of strategic sites in existing urban areas in close proximity to existing public transport facilities. The guidelines identify locations in cities and towns that may be suitable for apartment development as follows:

- Central and/or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and/ or Less Accessible Urban Locations

- 5.19. The subject site is located within an Intermediate Urban Location. The Apartment Guidelines note that these locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary but broadly >45 dwelling per hectare net) including:

- *Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;*
- *Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services.*

- 5.20. The subject site is currently located within 850m or 10 minute walking distance at its northern point to Skerries train station. The proposed development will link to the pedestrian linkage (proposed under FCC Reg. Ref. F21A/0287 ABP-312189-21) to the north-west corner of the subject site which greatly improve the accessibility to the train station. As such, the entirety of the site will be within 1,000-1,500 m of Skerries train station which is served by high capacity commuter trains. Therefore, it is considered that the site falls into the intermediate urban locations category and is therefore suitable for densities above 45 uph.

- 5.21. The proposed development entails a variation in density across the site in response to the proximity of the Skerries Train Station. Within the 900m walk band from the train station the net density is 65 u/ha and 50 u/ha within 1 km approximately. To the south, outside of the 1km walkband the scale and density of the scheme steps down to 30 u/ha net in response to both the distance of the train station and the site characteristics.

- 5.22. The Guidelines also note that in Intermediate Locations planning authorities must consider a reduced overall car parking standard.

“In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard

- 5.23. The proposed development will provide for 414 no. car parking spaces including 40 visitor spaces, creche set down and 3 spaces for creche staff parking located both within an undercroft and at surface level. As set out in Section 6 of this Statement of Consistency, this is below the normal car parking standard for the residential units set out in Table 12.8 of the County Development Plan

As set out in further detail in the Material Contravention Statement, the car parking provision is considered appropriate in the context of the Apartment Guidelines 2020 and the 2009 Sustainable Residential Development Guidelines. This is described further in the Mobility Management Plan prepared by DBFL Consulting Engineers and the Material Contravention Statement.

Unit Mix

- 5.24. SPPR 1 states the following in relation to apartment mix:

“Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed developments as studios and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).”

- 5.25. The proposed development provides for 306 no. apartment/duplex units comprising 84 no. 1 bed units (27%), 104 no. 2 bed units (34%) and 118 no. 3 bed units (39%) which is compliant with SPPR 1 of the apartment guidelines.

Apt. Mix	1 Bed	2 Bed	3 Bed	TOTAL
	84	104	118	306
	27%	34%	39%	

**Inc. Duplex Units*

- 5.26. SPPR 2 states that:

“For all building refurbishment schemes on sites of any size, or urban infill schemes on site of up to 0.25 ha:

- *For schemes of 50 or more units, SPPR1 shall apply to the entire development”.*

- 5.27. SPPR 2 is not applicable to the subject site.

Apartment Sizes

5.28. SPPR 3 states the following in relation to apartment sizes:

“Minimum apartment floor areas:

<i>Studio (1 person)</i>	<i>37 sq.m.</i>
<i>1 bedroom (2 persons)</i>	<i>45 sq.m.</i>
<i>2 bedroom (4 persons)</i>	<i>73 sq.m.</i>
<i>3 bedroom (5 persons)</i>	<i>90 sq.m.”</i>

5.29. The Guidelines state at Section 3.6 that *“accordingly, planning authorities may also consider a two-bedroom apartment to accommodate 3 persons, with a minimum floor area of 63 square metres in accordance with the standards set out in Quality Housing for Sustainable Communities”*. However, the guidelines also state at Section 3.7 that *“no more than 10% of the total number of units in any private residential development may comprise this category of two-bedroom three-person apartment”*.

5.30. The guidelines go on to state at paragraph 3.8 that the majority of apartments in any scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10%.

5.31. The proposed development provides for 25 no. 2 bedroom (3 person) apartments (7%), which is in compliance with the Guidelines.

5.32. All of the proposed apartment units meet or exceed the minimum standards set out in SPPR3 of the Apartment Guidelines 2020. Accordingly, the proposed development complies with SPPR3. Please see Housing Quality Assessment prepared by O’Mahony Pike Architects which has been submitted as part of this application for further details.

Dual Aspect Ratios

5.33. SPPR 4 of the apartment guidelines states in suburban or intermediate locations it is an objective that there shall be a minimum of 50% dual aspect apartments in a single scheme.

5.34. The proposed development which is located in an intermediate location provides for an overall of 100% dual aspect units in accordance with the apartment guidelines. A Housing Quality Assessment prepared by O’Mahony Pike is submitted as part of this planning application which demonstrates compliance with the applicable standards.

Floor to Ceiling Height

5.35. SPPR 5 states the following:

“Ground level apartment floor to ceiling height 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 up to 0.25 ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality”.

5.36. All apartments at ground floor provide for a minimum of 2.7m floor to ceiling height.

Lift and Stair Cores

5.37. SPPR 6 states the following:

“A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha, subject to overall design quality and compliance with building regulations”.

- 5.38. No more than 8 no. apartments per floor per core has been provided within the proposed development therefore the proposed development is in compliance with objective SPPR 6.

BTR/ Shared Accommodation

- 5.39. SPPR 7, 8 and 9 are not applicable to the proposed development as it is not a BTR or shared accommodation development.

Open Space

- 5.40. The apartment guidelines set out standards for private and communal open space.
- 5.41. Communal Amenity Space and Private Amenity Space is calculated as 4 sq.m for studio, 5 sq.m for a 1 bed unit, 6 sq.m for a 2 bed unit (3 person), 7 sq.m. for a 2 bed unit (4 person) and 9 sq.m. for 3 bed unit. The overall requirement for both communal open space and private open space for apartments would therefore each equate to 2,255 sq.m. There are 25 No. 2 bed 3 person units proposed.
- 5.42. The proposed development will provide for communal gardens to serve the apartment units. The outdoor communal space provided equates to 2,272 sqm. As such the proposed communal open space is well above the minimum requirement of the Guidelines.
- 5.43. The proposed private amenity spaces for each unit meets or exceeds the above standards. The following private open spaces are proposed for various apartments:
- 1 bed units private open space comprises 7.4 – 9.7 sqm
 - 2 bed units private open space comprises 7.3 – 25.1 sqm
 - 3 bed units private open space comprises 9.7 – 18 sqm
- 5.44. As set out above and in further detail within the HQA, the proposed development provides 4922.1 sqm of private open space which is in excess of the apartment guidelines standards requirement of 2,255 sq.m..

Car Parking

- 5.45. In regard to car parking the Apartment Design Guidelines state that:

“The quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria.”

- 5.46. Further in paragraph 4.21-4.23 states:

“2) Intermediate Urban Locations

In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard.”

The proposed SHD scheme includes the provision of 414 car parking spaces to serve the 345 housing units), which represents a car parking ratio of 1:1.2 which is consistent with the above guidelines for residential developments in intermediate urban locations. Furthermore 2 of these spaces will be allocated to car sharing clubs. In addition, over 800 bicycle spaces are to be provided, as well as an extensive network of cycle lanes and walkways, all of which will promote active transport modes, and less reliance on the private car.

Sunlight/Daylight

- 5.47. The Apartment Guidelines make specific reference to the BRE Guidelines when it states:

“Planning authorities should have regard to quantitative performance approaches to daylight provision outlined in guides like the BRE guide ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’ when undertaken by development proposers which offer the capability to satisfy minimum standards of daylight provision.

Where an applicant cannot fully meet all of the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, which planning authorities should apply their discretion in accepting taking account of its assessment of specific. This may arise due to a design constraints associated with the site or location and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”

- 5.48. The proposed SHD scheme has been assessed for daylight/sunlight performance based on these guidelines. The Sunlight, Daylight & Overshadowing Report prepared by Axis provides a full report on the findings. Overall Axis have found that the proposed scheme performs very well against all standards.

Urban Development and Building Height Guidelines 2018

- 5.49. The Urban Development and Building Height Guidelines 2018 (‘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 and Project Ireland 2040 and Regional Spatial and Economic Strategy for the Eastern and Midland Region.

- 5.50. The Guidelines set out the background and context for increased height, stating:

“A key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels. Increasing prevailing building heights therefore has a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development and our planning process must actively address how this objective will be secured.”

- 5.51. The proposed development is located on an underutilised site in Skerries and within close proximity to Skerries train station (850m or 10 minute walking distance from

northern site boundary). The proposed development provides for 2-4 no. storeys which is considered an appropriate height for the subject site given its designated as a 'highly sensitive landscape' within the Development Plan and the surrounding context of the site.

The Urban Development and Building Heights contain SPPR 4 which requires: 'It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2009)" or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.'*

- 5.52. The proposed development provides an appropriate density in compliance with the Sustainable Residential Development in Urban Areas (2009) at c. 52 units per hectare (net) for an '(c) Public transport corridors' due to the proximity to Skerries Train Station.
- 5.53. The proposal includes for a mix of building heights from 2-4 storey houses. In addition, the proposal avoids monotype building typologies, and includes a range of dwelling types, comprising 84 no. 1-bed units, 104 no. 2-bed units (68 no. 2-bed apartments and 36 no. 2-bed duplexes), 157 no. 3-bed units (118 no. 3-bed duplexes and 39 no. 3 - bed houses).
- 5.54. A Landscape and Visual Impact Assessment has been prepared by Modelworks and is submitted with this application as part of the EIAR.
- 5.55. As set out in Section 3.1 of the Guidelines, in relation to the assessment of individual planning applications "*it is Government policy that building heights must be generally increased in appropriate urban locations.*" Planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:
- *Does the proposal positively assist in securing National Planning Framework objectives of focusing development in 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?*
 - *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?*
- 5.56. In response to the above considerations, the current Fingal County Development Plan 2017-2023, which was varied in 2019 to be consistent with the NPF and Building Height Guidelines, has identified these lands within the Skerries development area of the town as being suitable for a residential development, and which would contribute to the compact growth of the town.

Regional Spatial Economic Strategy – Eastern and Midland Regional Assembly (2019-2031)

- 5.57. The Regional Spatial and Economic Strategy for the Eastern and Midland Region is a strategic plan and investment framework to shape the future development of the region

to 2031 and beyond. The principle function of the assembly is the delivery of a Regional Spatial and Economic Strategy (RSES), a new concept in Irish planning where not only the spatial but also the economic factors that go into the future of the region are brought together into one all encompassing strategy.

- 5.58. The primary status of the RSES is to support the implementation of Project Ireland 2040 – the National Planning Framework (NPF) and National Development Plan (NDP) and the economic policies and objectives of the Government by providing a long term strategic planning and economic framework for the development of the region.
- 5.59. The RSES is required under the Planning and Development Act 2000 (as amended) to address 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.
- 5.60. The RSES supports the consolidation and re-intensification of infill, brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs and in the key metropolitan towns, and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.
- 5.61. The proposal seeks to provide for residential development on an underutilised site which seeks to provide appropriate densities and heights in response to both national policy, existing site characteristics and the surrounding context. The proposed development therefore is compliant with the overall policies and objectives of the RSES in this regard.

Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

- 5.62. The role of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas is to ensure the sustainable delivery of new development throughout the country. The Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:
 - *Prioritise walking, cycling and public transport, and minimise the need to use cars;*
 - *Are easy to access for all users and to find one's way around;*
 - *Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;*
 - *Provide a mix of land uses to minimise transport demand.*
- 5.63. The Guidelines also provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. In this regard, the Guidelines are accompanied by a Design Manual discussed below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.
- 5.64. These Guidelines support a plan-led approach to development as provided for in the Planning and Development Act 2000. Section 2.1 of the Guidelines note that *'the scale, location and nature of major new residential development will be determined by the development plan, including both the settlement strategy and the housing strategy'*.

- 5.65. The Guidelines reinforce the need to adopt a sequential approach to the development of land and note in Section 2.3:
- and ‘the sequential approach as set out in the Departments Development Plan Guidelines (DoEHLG, 2007) specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities...’.*
- 5.66. Having regard to the above, the subject site is zoned ‘Residential Area’ (RA) with the objective *“Provide for new residential communities subject to the provision of the necessary social and physical infrastructure”* in the Fingal County Development Plan 2017 – 2023. The proposed development is therefore making the most efficient use of these underutilised, zoned lands by increasing residential development in proximity to the town centre and providing for densities above 50 uph in a key location in close proximity to Skerries train station. The guidelines recommended that increased densities should be promoted *‘within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station’.*
- 5.67. The proposed development is therefore compliant with the Guidelines in terms of the sequential development approach.
- 5.68. Sustainable neighbourhoods require a range of community facilities, and each district/neighbourhood will need to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally. Please refer to the Community and Local Needs Audit prepared by John Spain Associates which provides an audit of the existing social infrastructure in the Skerries area. The audit concluded that there are a wide range of facilities and open space which can support the proposed development.
- 5.69. Section 5.8 of the Guidelines recommends that *‘in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes’.* The proposed development provides for a density of 52 no. units per hectare. It is considered that given the location of the site within proximity to a number of services, including public transport services and existing local facilities that the proposed density on site is appropriate in this instance.
- 5.70. The subject development site is located approximately 650m (850m walking distance from norther site boundary) to the south-east of Skerries Railway Station. Skerries has an established rail infrastructure that provides linkages to Dublin in the south, and Drogheda to the north (15 services daily on average) from where further onwards connections can be made to other regional and strategic destinations. Irish Rail also includes other local intermediate destinations as part of its Regional and Dublin commuter services. Figure 5.1 below presents a summary of rail services available at Skerries Railway Station.
- 5.71. The proposed development entails a variation in density across the site in response to the proximity of the Skerries Train Station. These range from over 60uph on the norther part of the site nearest to the train station and gradually decrease down to c.35 uph in response to both the distance of the train station and the site characteristics.
- 5.72. In support of this density, a good level of transport provision is available in the area. In terms of bus routes this includes Dublin Bus whom operate route numbers 33, 33e, 33n and 33x that serve the subject site area. The nearest bus interchange opportunities to the subject site are located on Holmpatrick Rd (R128) and is situated

east of the site (approx. 850m). Bus stops on this corridor are approximately 10 minutes walking distance from the site which include stops no. 3793 and 3824. Route 33e is a north/south service that departs from Abbey St Lower, Dublin and terminates in Mourne View, Skerries. Route 33n continues northbound towards Balbriggan via Skerries departing from Westmoreland St. in Dublin City Centre. Route 33x provides a two-way connection from Custom House Quay to Skerries. Go-Ahead also operates route number 33 and 33a in conjunction with Dublin Bus. Route 33 provides a connection from Balbriggan to Dublin City Centre via Skerries. Route 33a provides a link from Skerries to Dublin Airport via Rush Rd (R128) interchanges which are a 850m walk from the subject site. Fingal Express operated by Sword Express offer route 533 and which connects Skerries to UCD via Dublin City Centre. This route travels on Holmpatrick and Rush Rd and serves stop no. 3824.

Route	Monday – Friday	Saturday	Sunday
Skerries to Dublin	31	20	15
Dublin to Skerries	30	21	15
Skerries to Drogheda	29	21	15
Drogheda to Skerries	30	20	15
Skerries to Dundalk	8	5	2
Dundalk to Skerries	7	5	1
Skerries to Rush & Lusk	29	19	15
Rush & Lusk to Skerries	27	21	15
Skerries to Malahide	30	19	15
Malahide to Skerries	27	21	15
Skerries to Balbriggan	30	21	15
Balbriggan to Skerries	31	20	15
Skerries to Laytown	29	21	15
Laytown to Skerries	29	19	15

Table 2.2: Rail Services to and from Skerries (No. of Services)

Figure 5.1: extract from TTA Table 2.2: Rail Services to and from Skerries (No. of Services) (Source: DBFL, 2022).

- 5.73. IDASO Ltd, a specialist data collection firm, were commissioned to undertake surveys of the local Rail and Bus routes, as detailed in Section 2.9 of in the TTA prepared by DBFL:

“The assessment of the existing local rail and bus based public transport networks reveals that sufficient capacity is available to accommodate the additional demand projected to be generated by the proposed 345 unit residential development by the LDA in Hacketstown, Skerries.”

- 5.74. The 2009 Guidelines also set out standards in relation to the provision of Public Open Space. Under para. 4.20 the Guidelines state: *“To ensure that there are adequate safeguards in place to avoid overdevelopment and to assist the planning authority in their assessment of planning applications, in general the following standards are recommended: In green-field sites or those sites for which a local area plan is appropriate, public open space should be provided at a minimum rate of 15% of the*

total site area. This allocation should be in the form of useful open spaces within residential developments and, where appropriate, larger neighbourhood parks to serve the wider community;”

- 5.75. The proposed development makes provision for 1.67 ha. of public open space which equates to 25% of the total site area. Therefore, the level of open space proposed in this scheme is consistent with the Public Open Space requirements of the 2009 Guidelines.
- 5.76. In addition to recommending appropriate densities, the Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:
- *prioritise walking, cycling and public transport, and minimise car use;*
 - *are easy to access for all users and to find one’s way around;*
 - *promote the efficient use of land and of energy, and minimise greenhouse gas emissions; and*
 - *provide a mix of land uses to minimise transport demand.*
 - *Reduce traffic speeds in housing developments*
- 5.77. The Guidelines also provide advice on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines are accompanied by a Design Manual which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.
- 5.78. The proposed development also has regard to the advice set down in the ‘In Practice’ section of the Urban Design Manual (2009), which recommends the following approach:
- Development Brief:* An analysis of the site has been carried out by O’Mahony Pike Architects. The proposed development has been designed to ensure that the proposed scheme is in keeping with the design of the surrounding area while achieving the most sustainable residential densities. The proposed development has also had regard to the existing residential properties to the west of the subject site.
- Site Analysis:* The characteristics of the subject lands and surrounding context have been established and potential linkages and vistas to adjoining lands have been analysed.
- Concept Proposals:* This planning application is accompanied by a Design Statement which outlines the concept design proposal. The Design Statement outlines the progression of the scheme design in terms of land use and density range, boundary conditions and connections which is discussed in greater detail below.
- Pre-planning:* Pre – planning discussions were held with Fingal County Council. Details of the formal S.247 meeting are included in Appendix 1 of this Statement of Consistency.
- 5.79. The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications and appeals. The 12 criteria are discussed in detail below.
- 5.80. This application is accompanied by an Architectural Design Statement, prepared by O’Mahony Pike, which demonstrates how the proposed development has regard to and has been developed in accordance with best practice in respect to urban design.

The Design Statement should be read in conjunction with this Statement of Consistency and with the plans and particulars accompanying this submission.

Urban Design Manual – A Best Practice Guide (2009)

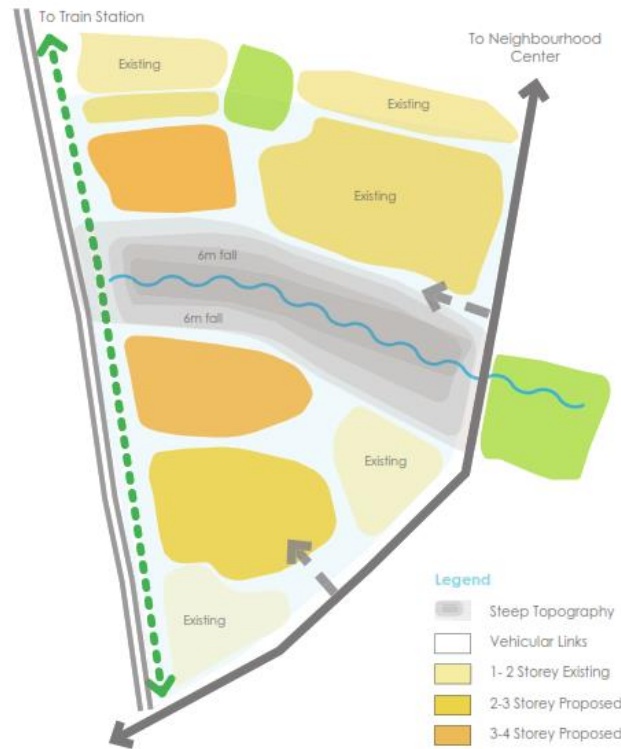
- 5.81. The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications and appeals. The 12 no. criteria are assessed as follows (also addressed in the Architectural Design Report prepared by OMP):



Urban Design Manual 12 criteria Source: Urban Design Manual DoEHLG 2009

Context: How does the development respond to its surroundings?

- 5.82. **Response:** The subject site is a greenfield site located to the south of Skerries in the townland of Hacketstown. The site is bound by the Dublin-Belfast Train line which creates a boundary to the west while it is serviced by the Golf Links Rd. to the east and the existing access road via Ballygossan Park to the north. The transitional heights of 2 no. storeys are proposed to the site boundary in response to the existing one-two storey residential context.
- 5.83. The Noonan Lands to the north are partially developed – Ballygossan Park Phase 1 was completed within the last 3 years. As part of its planning application, this development response to the key principles for both the remaining Ballygossan Park lands and the subject site.
- 5.84. The topography of the site falls and rises 6m towards the centre of the lands which holds a shared SUDS and associated riparian zone.
- 5.85. Heights and massing of 4 no. storeys are proposed to provide surveillance to the large open spaces on each side of the natural landscape, with complementary massing strategies north and south to provide a coherent edge.



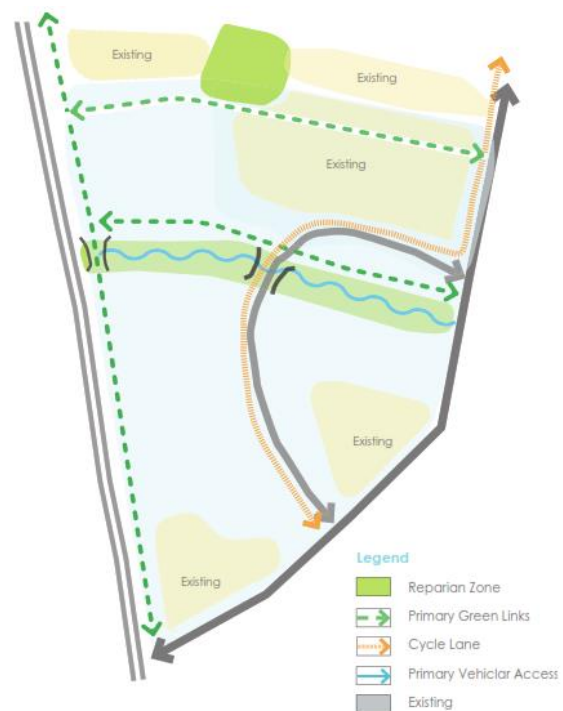
Connections: How well is the new neighbourhood / site connected?

5.86. **Response:** The development will contribute to the efficient movement and circulation in the area. Landscaping and materials will soften the appearance and will integrate the internal roads and paths with the existing and future network.

5.87. The subject lands are in close proximity to the Dublin-Belfast rail line and Skerries Train Station to the North. A pedestrian link to the train station is anticipated (Reg. Ref. FCC F21A/0287; ABP-312189-21) to the north west corner of the existing phase of the Ballygossan Park scheme, with the proposed SHD extending this public realm strategy along the western boundary to create a linear park.

5.88. The site benefits from 2 No. vehicular access points via Ballygossan Park to the north which provides a connection to the Golf Links Road and to the south east corner of the site. Cycle provision is relatively ad hoc in the vicinity, but a the cycle network is proposed to be continued through the site.

5.89. The proposed layouts take account of adjacent planned development to provide one primary vehicular route north to south across the landscape feature, supplemented



by two pedestrian/ cycle focussed links that will also span the preserved open space remedying current severance caused by the topography.

- 5.90. Permeable edges are presented to existing adjacent communities allowing new routes to established destinations and shared amenity of the open space.
- 5.91. Local links through the development are provided by means of a coherent and connected open space strategy and high quality residential streets.

Inclusivity: How easily can people use and access the development?

5.92. **Response:** Permeability of the layout and clearly defined openings to the surrounding neighbourhoods ensures that open spaces and other amenities are inviting. The proposed development has been designed to be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability.

5.93. A variety of housing types and tenures are provided to ensure a diverse population.

5.94. Permeability of the layout and clearly defined openings to the surrounding neighbourhoods ensures that open spaces and other amenities are inviting.

5.95. Streetscapes, public realm and landscape design will provide access options suited to all levels of mobility.



Variety: How does the development promote a good mix of activities?

5.96. **Response:** The primary purpose of the development is to delivery housing, considering the zoning, context and location of the site this is considered the most suitable. However a mix of passive and active green spaces are provided in a coherent public open space strategy organised around the presence of the preserved landscape feature as a 'green spine'. 1.67 ha. of public open space in total is provided as illustrated in Figure 5.4 below, including a number of formal and informal play areas, and a childcare facility is also provided.

5.97. Socially supportive uses such as flex spaces and creches are provided within the development, organised with reference to movement networks to encourage active transport.

5.98. Active frontages will be provided to support passive surveillance of primary green links including pedestrian routes to the train station from the developments.



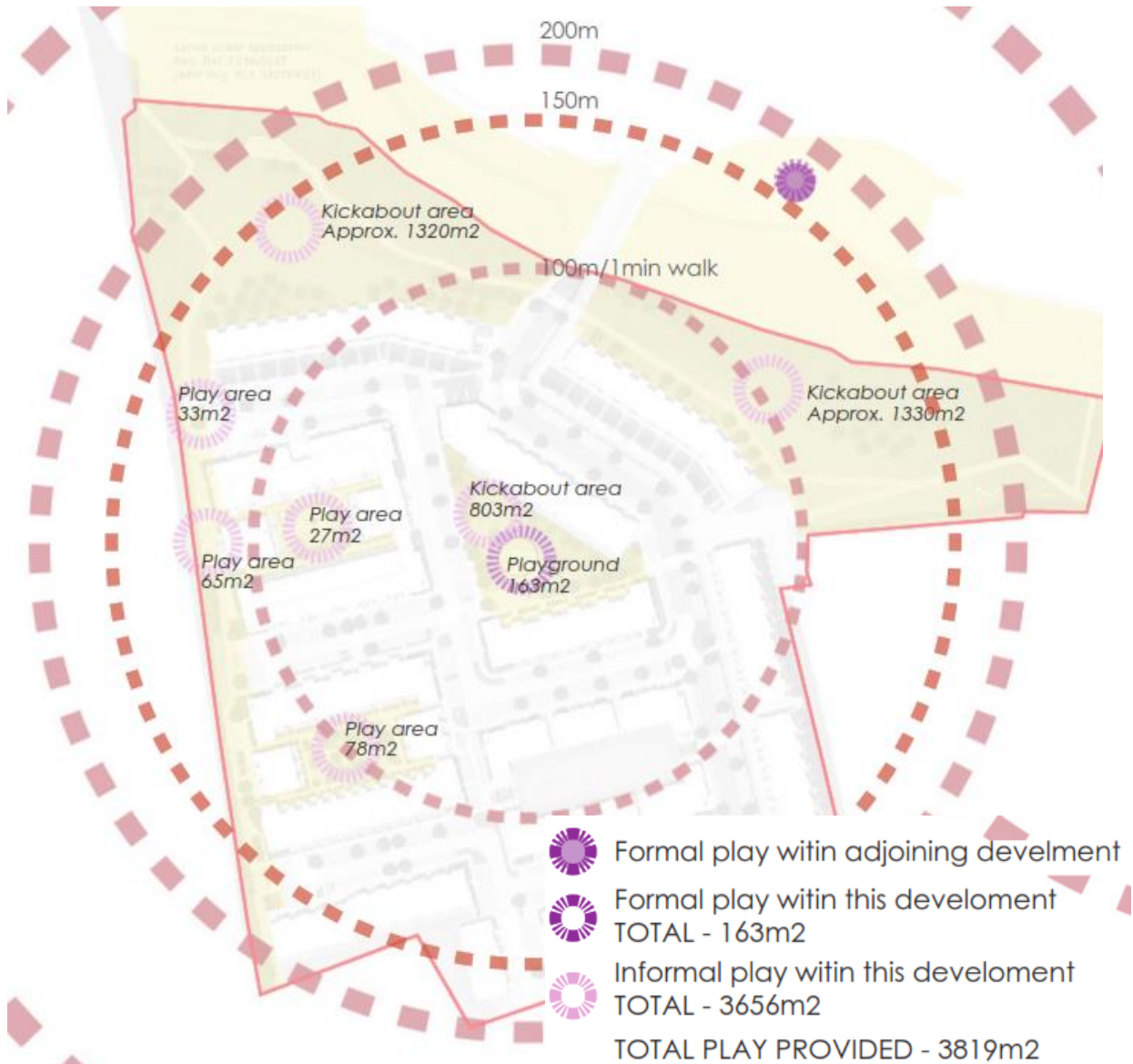


Figure 5.2: Playspace provision (Source: BSLA, 2022).

Efficiency: How does the development make appropriate use of resources, including land?

5.99. **Response:** Existing open spaces are harnessed as the 'green spine' of the open space strategy. The most valuable planting along the site perimeter is proposed to be retained and complemented with biodiversity friendly species as per National Pollinator Guide.

5.100. Sustainable residential densities are achieved in line with National Guidance for lands within 1km walking distance to the train station.

5.101. The proposed framework takes full advantage of the pedestrian link to the train station, integrating it into a linear park through the shared development.

Distinctiveness: How do the proposals create a sense of place?

5.102. **Response:** A unique identity is provided by the existing landscape feature traversing the site.

- 5.103. Heights and massing of the higher density blocks will respond to the scale of the open space to provide a legible centre for local orientation and wayfinding.
- 5.104. Frontages along the north-south spine will define a clear street hierarchy by means of massing and articulation.
- 5.105. Individual housing areas will employ public realm sand material assembly strategies to define local characteristics within a coherent overall identity.

Layout: How does the proposal create people-friendly streets and spaces?



5.106. **Response:** The proposed development provides for significant improvements to the public realm and pedestrian accessibility to the site. As such, the scheme creates a people friendly environment of streets and spaces by legibly using new public open spaces to connect the identified character areas.

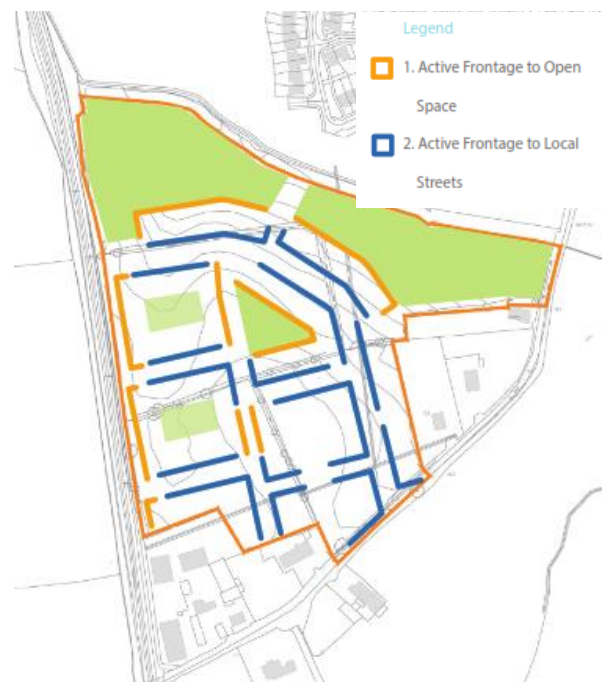
5.107. The routes within the site and beyond follow desire lines setup through the public open spaces and connecting the key local amenities including the proposed childcare facility.

Public Realm: How safe, secure and enjoyable are the public areas?

5.108. **Response:** The proposed development has been designed to ensure a high level of passive surveillance of the open spaces is provided for within the development. All areas of communal and public open space benefit from passive surveillance from the adjoining residential buildings.

5.109. The provision of communal garden areas between the proposed apartment units will ensure a safe and secure environment is maintained within the outdoor space. In addition, the communal areas will be separated from the public open space area. This will ensure a safe and enjoyable environment for the future residents.

5.110. It is therefore considered that the proposed design and layout of the overall development provides for a high quality safe and enjoyable area to reside.



Adaptability: How will the buildings cope with change?

- 5.111. **Response:** The proposed residential units meet or exceed the minimum standards for residential unit size. The development provides a mix of 1, 2 and 3 bed units that can be easily reconfigured to adapt to the changing life cycles and personal needs of each resident. Both apartments and houses contain a range of house types, providing additional variety and choice for the future residents.
- 5.112. A Building Life Cycle Report prepared by O'Mahony Pike is submitted with the application which demonstrates how the proposed development will adopt to changes to life cycles and tenures.

Privacy / Amenity: How do the buildings provide a high quality amenity?

- 5.113. **Response:** The units are provided with an area of useable private open space in the form of terraces, balcony or gardens which meets or exceeds the relevant guidelines standards. All of the apartment/duplex units meet the Section 28 Guidelines unit size requirements. The design of the units has also had due regard to the siting and orientation of the development in order to maximise daylight.
- 5.114. The development provides for adequate separate distances between the proposed apartment units and the existing houses located on the Noonan lands to the north to of the subject site. This maintains a high level of privacy and amenity obtained by residents and reduces any perceived overlooking and overshadowing.
- 5.115. The proposed development also provides for a minimum of 22 m separation distances between blocks. The Daylight/ sunlight analysis demonstrates that given the proposed buildings orientation, this level of separation is adequate to meet the BRE guidelines.
- 5.116. In addition, the proposed development will also provide for high quality amenity space in terms of landscaped open space. The provision of the high quality communal open space increases the level of residential amenity obtained for the future residents. As such it is considered that the proposed development provides for a high quality amenity value throughout the scheme.

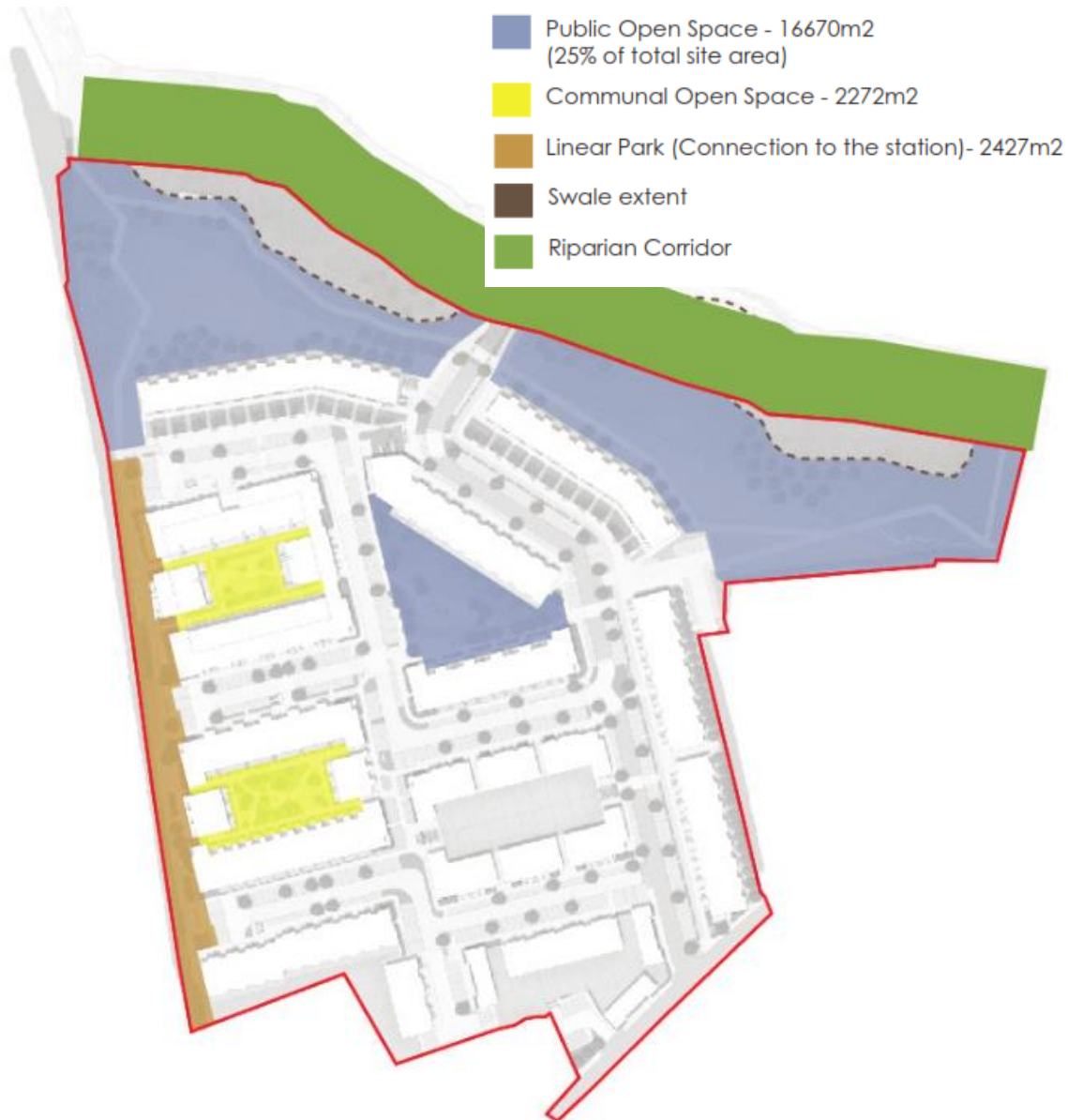


Figure 5.3: landscape type provision (Source: BSLA, 2022).

Parking: How will the parking be secure and attractive?

5.117. **Response:** A total of 414 no. car parking spaces will be provided to serve the residential development including 40 visitor spaces, creche set down and 3 for creche staff parking. The car parking spaces will be located within the undercroft below Block E and at surface level which are overlooked by the proposed dwelling and apartment units in order to provide passive surveillance and security.

Proposed car parking is provided on the following basis:

- 372 no. residents spaces comprising:
 - 314 no. standard residential bays,
 - 19 no. disabled bays of which 6 are provided with EV charge points,
 - 39 no standard sized bays with EV charge points
- 40 no. resident visitor spaces
- 6 no. creche parking spaces (which can also be used as additional visitor parking at times when the creche is closed e.g. night time and weekends)

- comprising:
 - 3 no. spaces allocated to staff (and provided with EV charge points) and
 - 3 no. drop-off / set-down spaces.
- 1 no. Dedicated Car Share (GoCar) bay

5.118. In addition to on-street parking, car parking will also be located at undercroft level within Block E. The scheme proposals include a further 107 no. car parking spaces at this location of which 10 no. spaces will provide EV charging. Vehicles will be able access / egress the facility via 6.0m wide entrance that will be located at the northern end of Block E. Section 5.3 of the TTA sets out further detail in regard to the Car parking management Strategy.

5.119. 802 no. bicycle parking spaces including 120 No. visitor spaces will also be provided to cater for the proposed development in secure location within the development for both for the future residents and visitors.

Detailed Design: How well thought through is the building and landscape design?

5.120. **Response:** The design of the development has been subject to pre-application consultation between the design team, An Bord Pleanála and Fingal County Council. Details of pre-application consultation with FCC are attached as Appendix 1 of this report.

5.121. The Architectural Design Statement sets out a comprehensive design rationale for the proposed development. A Landscape Design Statement is also submitted with this pre-planning application prepared by BSLA. The proposed landscape strategy will ensure appropriate boundary treatments are provided as well as a well designed landscape strategy for the communal courtyards and the public open spaces as to ensure the use of these spaces is maintained throughout the year.

5.122. The Site strategy has two main conceptual components. The first is the use of a shared garden courtyard typology to achieve more sustainable densities while employing more standard dwelling types. The second is the culmination of the massing strategy in a four storey duplex typology to edge the riparian strip linear park. This allows an appropriately scaled architectural response to the dramatic local topography while retaining a lower scaled edge within the streetscape. There are three character areas within the scheme, including 1: Parkland, 2: Shared Gardens, 3: Avenues and Streets.

5.123. The proposed layout will create a sense of place through the creation of new spaces while respecting the existing fabric of the site and responding to the changes to come. The scheme creates people friendly streets and spaces through legible new public open spaces that connect the distinct character areas within. Key to these are a sequence of interconnected shared courtyards providing secondary 'outdoor rooms' leading to the riparian strip green link. The riparian strip itself forms the basis of a linear park linking the sites north and south and extending to the east, and allows the creations of a shared SUDS strategy. The sharp 6m fall to the gully is unsuited to conventional housing forms, so in order to ensure that all open spaces are overlooked by nearby homes and provide safe amenity for users, built forms in this location adopt a duplex typology to better enclose and supervise the route.

5.124. The landscape strategy considers a hierarchy of public, communal and private spaces throughout the development offering a variety of amenity for this mixed tenure and dynamic development. A 'ground-up' landscape-led neighbourhood organisation is proposed, structured by a clear hierarchy of primary and secondary street networks designed with reference to DMURS. Connections to local amenities - including the

existing parade of shops c.400m north-east on Shenick Ave. and Skerries Railway Station to the north-west- and the wider context have been considered with regard to pedestrian, cyclist and vehicular networks. Routes within the site and beyond follow desire lines through public open spaces and connect the key local amenities such as nearby playing fields via improved secondary networks centred on pedestrian and cycle use.

Delivering Homes, Sustaining Communities (2008)

- 5.125. The Department's policy statement Delivering Homes, Sustaining Communities, Guidance provides the overarching policy framework for an integrated approach to housing and planning. The statement notes that demographic factors will continue to underpin strong demand for housing, which in turn will present considerable challenges for the physical planning of new housing and the provision of associated services. The quality of the housing environment is stated as being central to creating a sustainable community.
- 5.126. 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.
- 5.127. The Delivering Homes, Sustaining Communities policy statement is accompanied by Best Practice Guidelines entitled '**Quality Housing for Sustainable Communities**'. The purpose of these Guidelines is to promote high standards in the design and construction and in the provision of residential and services in new housing schemes. The guidelines encourage best use of building land and optimal utilisation 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 scheme 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.
- 5.128. This planning application is accompanied by a Housing Quality Assessment document prepared by O'Mahony Pike Architects which demonstrates the consistency of the proposed development with the relevant standards in the Quality Housing for Sustainable Communities.

Design Manual for Urban Roads and Streets (DMURS) (updated 2019)

- 5.129. The Design Manual for Urban Roads and Streets (DMURS) originally published in 2013, and updated in 2019 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. The DMURS Compliance Report prepared by DBFL Consulting Engineers and submitted with this application provides further detail in respect of the compliance of the proposed development with DMURS, which is discussed below also.
- 5.130. DMURS aims to end the practice of designing streets as traffic corridors, and instead focus on the needs of pedestrians, cyclists, and public transport users. The Manual sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. Incorporating good planning and design practice and focus on the public realm, it also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

5.131. The principle design guidance of DMURS has been considered in the design of the proposed development. As demonstrated in the DMURS Compliance document prepared by DBFL accompanying this application, the proposed development seeks to prioritise pedestrian and cyclists throughout and around the site in accordance with the policies set out in DMURS.

Guidelines for Planning Authorities on Childcare Facilities (2001)

5.132. Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the pre-planning discussions.

5.133. The following definition of Childcare is included in the Guidelines:

“In these Guidelines, ‘childcare’ is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education and socialisation opportunities for children. Thus services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.”

5.134. The Section 28 Sustainable Urban Housing; Design Standards for New Apartments; Guidelines for Planning Authorities 2020 states that:

“Notwithstanding the Department’s Planning Guidelines for Childcare Facilities, which are currently subject to review and recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision in apartment scheme 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 for the area”.

5.135. The Sustainable Urban Housing; Design Standards for New Apartments; Guidelines for Planning Authorities 2020 states that *“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”.*

5.136. The proposed development provides for 345 units within the scheme. In calculating the need for childcare, it is common practice to discount the number of 1 bedroom units from the equation as it is considered that these units will not be occupied by families. There are 84 no. 1 bedroom units being provided, as such only 261 no. units will accommodate families. Taking the above standard into account ($261/75 \times 20 = 70$) there is a requirement for 70 no. childcare spaces to be provided within the proposed development.

5.137. The proposed development provides for a creche facility (377 sqm). Based on the methodology set out in the Guidelines for Planning Authorities on Childcare Facilities. It is considered that this facility is suitably sized (3-5 sqm per child) to meet the childcare demand as a result of the proposed development.

Transport Strategy for the Greater Dublin Area 2016 - 2035

- 5.138. This strategy has been prepared by the National Transport Authority. The Vision of this strategy is for Dublin to be a competitive, sustainable city-region with a good quality of life for all by 2030.
- 5.139. The Strategy includes five overarching objectives to achieve the vision which are as follows:
- Build and strengthen communities
 - Improve economic competitiveness
 - Improve the built environment
 - Respect and sustain the natural environment
 - Reduce personal stress
- 5.140. The Strategy sets out measures to achieve the vision and objectives for the GDA. These include better integration of land use planning and transportation, consolidating growth in identified centres, providing more intensive development in designated town and district centres and control parking supply.
- 5.141. The Strategy builds on previous strategies and investment programmes, and for this reason several major infrastructure schemes that are included in the government's Transport 21 investment framework are included in all of the strategy options.
- 5.142. The proposed residential development, which provides for a density of 52 uph, in close proximity to existing quality rail public transport (850 m or a 10 minute walking distance) is considered to be consistent with the vision and objectives of the Transport Strategy for the GDA.

DART+ Programme

- 5.143. DART+ is a transformative programme of projects under the National Development Plan (Updated October 2021) which aims to modernise and improve existing rail services in the Greater Dublin Area (GDA). It will provide a sustainable, electrified, reliable and more frequent rail service, improving capacity on rail corridors serving Dublin. We note this programme comprises a number of infrastructural projects including 'DART+ Coastal North to Drogheda via Skerries'.
- 5.144. The current DART network is 50km long, extending from Malahide/ Howth to Greystones. The DART+ programme will increase the length of the DART network to 150km of railway corridor through the electrification and upgrade of existing lines transforming commuter train travel in the Greater Dublin Area (GDA). The DART+ Programme also includes the purchase of new train fleet.
- 5.145. The DART+ Programme will deliver frequent, modern, electrified services to: from Dublin City Centre (Connolly and Spencer Dock) to:
- Maynooth and M3 Parkway;
 - Hazelhatch and Celbridge;
 - Drogheda; and
 - Greystones
- 5.146. The subject site is within c. 850 m a 10 minute walking distance of Skerries train station which is located along the Dublin to Drogheda route. See Figure 5.4 below.



Figure 5.4: DART+ Programme Route Map.

BusConnects – Transforming City Bus Services (2018)

- 5.147. The subject site is located approximately 850m west of a proposed BusConnects services which will run along the Rush Road (R128). These routes will be delivered as part of the National Transport Authority's (NTA) Bus Connects initiative, which will transform the current bus system by redesigning routes to offer fast, predictable and reliable journeys. The subject site will therefore benefit from enhanced accessibility and mobility levels delivered by BusConnects. Under the BusConnects proposals, the following routes will serve Skerries as well as the subject site and are shown below in Figure 5.5:
- 5.148. Local Route L85, proposed under BusConnects, will run every 30 minutes on weekdays and weekends from Balbriggan to Dublin Airport via Skerries, Rush, Lusk and on to Swords. It is proposed to operate along Rush Rd and Holmpatrick Rd approximately 800m east of the subject site.
- 5.149. Express Route X76 is exclusively a peak time route which will run from Skerries to University College Dublin (UCD) via Rush and Lusk. This route is proposed with 5

southbound AM trips from Skerries between 6:00 and 8:00, and 5 northbound PM trips from UCD starting between 16:00 and 18:00. Once again, this route are proposed to operate along Rush Rd and Holmpatrick Rd approximately 800m east of the subject site.

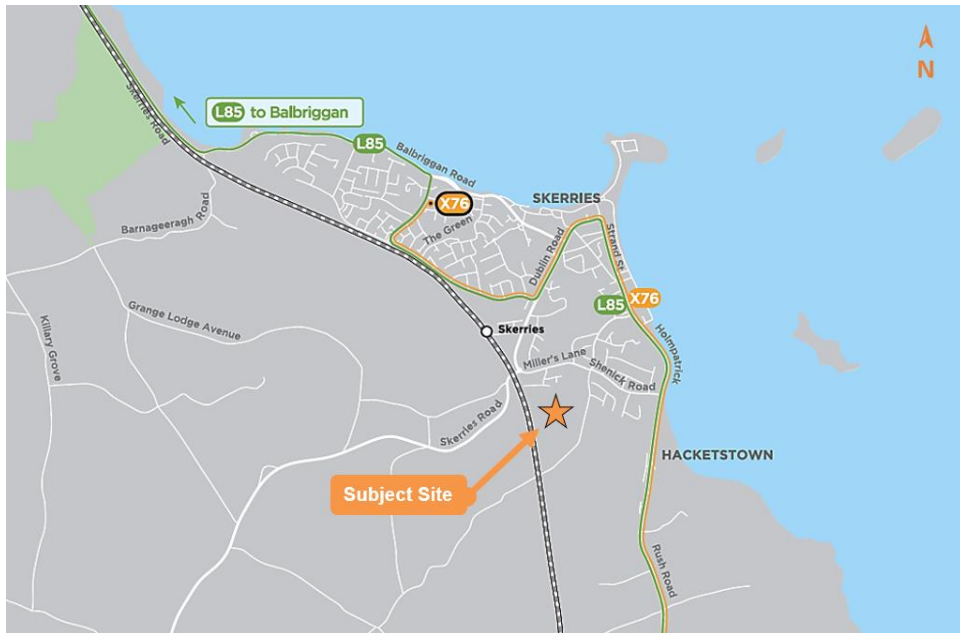


Figure 5.5: Proposed BusConnects Routes in Skerries (Source: Busconnects.ie)

Guidelines for Planning Authorities on ‘The Planning System and Flood Risk Management (November 2009)’

- 5.150. *The Planning System and Flood Risk Management Guidelines* were published by the Minister for the Environment, Heritage and Local Government in November 2009 under Section 28 of the Planning and Development Act 2000 (as amended). The Planning system and flood risk management guidelines require the planning system at all levels 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; 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.
- 5.151. We note Objective SW07 (page 275 of the Development Plan for reference) *‘Implement the Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG/OPW 2009) or any updated version of these guidelines. A site-specific Flood RiskAssessment to an appropriate level of detail, addressing all potential sources of flood risk, is required for lands identified in the SFRA, located in the following areas: ... Skerries; ... demonstrating compliance with the aforementioned Guidelines or any updated version of these guidelines, paying particular attention to residual flood risks and any proposed site specific flood management measures.*
- 5.152. A Site Specific Flood Risk Assessment (SSFRA) was prepared by DBFL to comply with current planning legislation, in particular the recommendations of “The Planning System and Flood Risk Management - Guidelines for Planning Authorities”. In order to comply with these Guidelines a Flood Risk Assessment and a Site Specific Flood Risk Assessment has been prepared by DBFL, which concludes:

“The proposed flood mitigation measure(s) outlined in Section 5.5 will be implemented as part of the proposed development as illustrated in the DBFL suite of civil engineering drawings. It is considered that the flood risk mitigation measures once fully implemented are sufficient to provide a suitable level of protection to the proposed development and will not cause an increased risk of flooding to external properties or to the downstream watercourse. Regular maintenance of the drainage system will ensure that the network remains effective and in good working order should a large pluvial storm occur. In the event of extreme pluvial flooding then overland flood routes would direct water towards the open space areas and Regional Drainage Facility.

Should extreme pluvial flooding occur in excess of the development’s drainage capacity i.e. exceeding 1%AEP, then overland flood routes towards the on-site open spaces and Regional Drainage Facility will protect the development and houses with lowest proposed floor levels. While the development constitutes ‘highly vulnerable’ development, it is appropriate for this flood zone (Flood Zone C) and the scheme has been designed to ensure that the risk of flooding of the development is reduced as far as is reasonably practicable (residual risks noted in chapter 6). The development does not increase the risk of flooding to adjacent areas and roads once mitigation measures are implemented.”

Delivering Homes, Sustaining Communities (2008)

- 5.153. The Department’s policy statement Delivering Homes, Sustaining Communities, provides the overarching policy framework for an integrated approach to housing and planning. The purpose of these Guidelines is to promote high standards in the design and construction and in the provision of residential and services in new housing schemes.
- 5.154. They encourage best use of building land and optimal utilisation 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 scheme 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.
- 5.155. The proposed development has taken regard of this departmental policy in its design and development and is observed to promote a high-quality residential scheme which makes optimum use of an area of zoned and serviced residential land in a strategic location and promotes a sense of community

6.0 ENVIRONMENTAL CONSIDERATIONS – APPROPRIATE ASSESSMENT AND ENVIRONMENTAL IMPACT ASSESSMENT REPORT

6.1. Under Article 6 (3) of the EU Habitat Directive any plan or project which has the potential to significantly impact on the integrity of a Natura 200 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Acts 2000 to 2021.

6.2. An Appropriate Assessment Screening Report and Natura Impact Statement prepared by Altemar, are submitted with this planning application to the Board. The NIS concluded that:

“This report presents an Appropriate Assessment Screening and NIS for the proposed development. It outlines the information required for the competent authority to screen for appropriate assessment and to determine whether or not the proposed development, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites’ conservation objectives, will adversely affect the integrity of the European site.

On the basis of the content of this report, the competent authority is enabled to conduct an Appropriate Assessment and consider whether, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites’ conservation objectives, will adversely affect the integrity of the European site.

No significant effects are likely on Natura 2000 sites, their features of interest or conservation objectives. The proposed project will not will adversely affect the integrity of European sites”.

6.3. This SHD application comprises residential development of 345 No. units and, as noted above, is preceded by the application for AI Works (FCC Reg. Ref. F21A/0287; ABP Reg. Ref. 312189) in order to facilitate future residential development on lands of the subject site. This application was also preceded by an application for off-site road improvements (ABP Reg. Ref. 309409; FCC Reg. Ref. F20A/0324) to facilitate developments on the residentially zoned lands in the Hacketstown area which was .7 ha in size.

6.4. We also note a residential scheme of 144 residential units and creche on a site 2.75 ha at Ballygossan Road, Golf Links Road, Skerries, Co. Dublin (i.e. Ballygossan Phase 2) is anticipated in the near future. This application was previously subject of an SHD Pre-Application Consultation Request under ABP (ABP-308583-20).

6.5. The potential cumulative impacts of these proposed road improvements, together with other permitted and proposed developments (namely within the project’s zone of influence, are assessed as part of this EIAR.

Notwithstanding the fact that the subject site area and unit numbers for the SHD Project are below the respective EIAR thresholds, having regard to the level of inter-connectivity with the adjoining AI Works application site, and having regard to the precautionary principle, an EIAR has been prepared to accompany the subject application, having regard to the overall combined size of the site and to category 10(b)(i) of Part 2 of Schedule 5 of the Planning Regulations this EIAR has been prepared to accompany the planning application.

7.0 LOCAL PLANNING POLICY

- 7.1. This section of the planning report provides an account of the relevant local planning policy documents and includes reference to the Fingal County Development Plan 2017-2023,

FINGAL COUNTY COUNCIL DEVELOPMENT PLAN 2017-2023

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

Core Strategy and Settlement Strategy

- 7.3. The Planning and Development (Amendment) Act 2010 introduced the requirement for an evidence-based “Core Strategy” (CS) to be incorporated as part of County Development Plans. The purpose of a Core Strategy is to articulate a medium-to-longer term quantitative-based strategy for the spatial development of the area of the Planning Authority, and, in so doing, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with National and Regional planning policy.



Figure 7.1: Core Strategy Map with approximate site location indicated by red star.

- 7.4. The emphasis of this Plan is to continue to consolidate the existing zoned lands and to maximise the efficient use of existing and proposed infrastructure. In this way the Council can ensure an integrated land use and transport strategy in line with national and regional policy.

- 7.5. Variation No. 2 to the Fingal Development Plan 2017-2023 (adopted on 19 June 2020) provides for a total residential capacity for a number of towns/villages in the County including Skerries:

Town/Village	Remaining Capacity (hectares)	Remaining Residential Units
Core Area		
Self-Sustaining Towns		
Balbriggan	134	3805
Rush	51.5	1771
Lusk	38	1020
Skerries	32.7	883
Towns & Villages	101	818

- 7.6. It is considered that the Skerries area has ample capacity for the proposed development which provides for 345 no. residential units. Skerries is considered a 'Self Sustaining' town capacity for 883 No. units.
- 7.7. The Fingal Settlement Strategy embraces the strategic approach advocated by the RSES to physically consolidate the majority of future growth into the strong and dynamic urban centres of the Metropolitan Area while directing development in the Core Areas of towns and villages in order to discourage dispersed development and unsustainable travel patterns.
- 7.8. The Strategy seeks to focus higher density development in suitable strategic nodes along existing or planned public transport corridors. The subject lands are located within the development boundary of Skerries. The Development Plan lists Skerries as a Core Area. The lands occupy a green-field landholding located in a coastal area of the County directly adjacent to commuter railway line and within close proximity to Skerries Town Centre. Indeed, the subject lands represent one of last remaining residentially zoned land holdings left available for development within the development boundary of Skerries.
- 7.9. The Core Strategy has capacity for the proposed development. The following permissions have been granted in Skerries during the plan period:

Reg. Ref.	Units	Location	Date Granted
F20A/0711	12	Eircom Telephone Exchange, Mill Hill Park, Skerries, Co. Dublin	Granted by FCC however pending Appeal

F17A/0542	63	Barnageeragh Cove, Kellys Bay, Skerries, Co. Dublin.	Granted 05 Dec 2017
F11A/0309/E 1	103	Golf Links Road, Hacketstown, Skerries, Co. Dublin ('Ballygossan Phase 1')	05 Feb 2018

Metropolitan Area	Core Area
Dublin City and Suburbs Consolidation Area Blanchardstown Baldoyle Castleknock Clonsilla Howth Mulhuddart Village Sutton Santry (Incl. Ballymun) Balgriffin & Belcamp Charlestown & Meakstown	
Key Town Swords	
Other Metropolitan Areas Portmarnock Baskin	
Self Sustaining Growth Town Donabate	Self Sustaining Towns Balbriggan Lusk Rush Skerries
Self Sustaining Town Malahide	
Towns and Villages Portrane Coolquay Kinsealy Rivermeade Rowlestown	Other Core Towns and Villages Balrothery Loughshinny Ballyboghil Naul Balscadden Oldtown Garristown Ballymadun
Rural – Clusters and Rural Area See Chapter 5 entitled 'Rural Fingal' for a full list of rural clusters	

Table 7.1: Fingal Settlement Strategy 2017-2023.

7.10. The Development Plan sets out the following objectives in relation to the Settlement Strategy:

Objective SS01 - 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 core to towns and villages, as advocated by national and regional planning guidance.

Objective SS01a - 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.

Objective SS01b - 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.

Objective SS02 - 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.

Objective SS02a - 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.

- 7.11. As set out within the application documentation in particular Architectural and Landscape Design Statements, the proposed development provides an appropriate response to the existing site context including the existing residential amenity and supports the achievement of the strategic objectives for Skerries set out in the Fingal Development Plan. The development provides a suitable density considering its proximity to Skerries train station and is contiguous the existing built form of the town.

Objective SS20 - Manage the development and growth of Lusk, Rush and Skerries in a planned manner linked to the capacity of local infrastructure to support new development.

- 7.12. The proposed residential development provides for a residential development on suitably zoned land, strategically located site in Skerries, served by quality public transport infrastructure and provides substantial open space, is considered to be consistent with the vision and objectives outlined above.

Skerries Development Plan Objectives

- 7.13. Chapter 4 includes a number of Objectives for Skerries including:

Objective SKERRIES 14

Prepare and/or implement the following Local Area Plans and Masterplans during the lifetime of this Plan:

- *Hacketstown Local Area Plan (see Map Sheet 5, LAP 5.A)*
- *Barnageeragh Masterplan (see Map Sheet 5, MP 5.A)*
- *Ballast Pit Masterplan (see Map Sheet 5, MP 5.B)*
- *Skerries Town Park Masterplan (see Map Sheet 5, MP 5.C)*
- *Milverton Masterplan (see Map Sheet 5, MP 5.D)*
- *Holmpatrick Masterplan (see Map Sheet 5, MP 5.E)*

- 7.14. As noted in the introduction, a Local Area Plan for Hacketstown was in place when the development plan was made in 2017. However, the Hacketstown Local Area Plan expired on 9th of February 2019 and is no longer in force.

- 7.15. We note the following relevant objectives:

- *Objective SKERRIES 1 Promote the development of Skerries as a vibrant local service, social and cultural centre and promote local tourism.*
- *Objective SKERRIES 2 Promote the growth of appropriate commercial activity in the town.*
- *Objective SKERRIES 3 Encourage mixed use development and require where practicable that a residential component is included in redevelopment proposals within the designated town centre zone (TC).*
- *Objective SKERRIES 4 Promote and facilitate the operation of a local bus service to the rail station and high quality bus transport links between Skerries and Dublin City Centre.*
- *Objective SKERRIES 5 Prepare a Recreational Strategy for open space lands at Kellys Bay, Mourne View, and Skerries Rock.*
- *Objective SKERRIES 6 Encourage and facilitate the provision of a swimming pool in Skerries.*
- *Objective SKERRIES 7 Restore the Martello Tower at Red Island.*
- *Objective SKERRIES 8 Prepare an Urban Framework Plan to guide and inform future development of the harbour area incorporating mixed-use development including community/recreational and marina/ water sports facilities with improved accessibility including enhanced off-street car-parking.*
- *Objective SKERRIES 9 Promote the Millennium Walk through the town.*
- *Objective SKERRIES 10 Promote and ensure a safe and convenient road, pedestrian and cycle system highlighting accessibility and connectivity both within the town as well as between the town and surrounding towns and villages.*
- *Objective SKERRIES 11 Promote and facilitate increased permeability and accessibility for those using active travel modes, prams, wheelchairs, personal scooters and other similar modes.*
- *Objective SKERRIES 12 Continue to support the delivery of enhanced recreational, community, social, youth and educational facilities in the area.*
- *Objective SKERRIES 13 Promote and facilitate the development of the Balbriggan to Skerries cycling/walking Scheme along the Coast Road within the lifetime of this Development Plan*

7.16. In regard to Objective SKERRIES 10/11, as set out widely within the proposed development, the scheme contains a range of walking and cycling routes throughout the site as illustrated in BSLA's Landscape Masterplan and DBFL's TTA. Cycling is an important aspect of the proposed development the main bicycle route runs north south through the site and a shared pedestrian - cyclist path along the western boundary and east-west through the parkland. These proposals will make a significant contribution to permeability and connections in the area. Proposals include connections with future and existing route such as new school to the east and Ballygossan Park residential area.

Place Making

- 7.17. Fingal County Council aims to achieve successful and sustainable communities throughout the County. Chapter 3 sets out the role of the Development Plan in this regard.
- 7.18. In relation to 'Sustainable Housing' the Development Plan references Rebuilding Ireland – an Action Plan for Housing and Homelessness. Chapter 3 states that in order to achieve sustainable neighbourhoods and maximise the contribution of the built environment to addressing climate change Fingal will *consolidate the existing communities, already served by public transport and close to established social and community infrastructure, and the creation of new communities serviced by high quality transport links.*

7.19. We note Objective DMS39 which states:

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.

7.20. The character of the lands has a significant influence on the response to the site layout solution for the lands. The variation in topography impacts the location and access of dwellings, the typology and buildability of forms and at the same time, will provide a unique setting for a focused public realm. The proposed development has frontage with golf links road which respects the rural character, any visual impact is softened by landscaping, Golf Links Road has a predominately rural character to which the scheme presents sensitively.

7.21. The proposed development response to the existing ownership patterns which include the Noonan Lands to the north which are partially developed. The Ballygossan Park Phase 1 was completed within the last 3 years. The proposed development will tie in with the as built context to the north.

7.22. In keeping with the local context of predominately 2-storey suburban dwelling types, a low-rise high density strategy is proposed in which building heights are predominately 2-storey, rising to 3-4 storeys as the land falls to the north Transitional heights of 2 storeys are proposed response to the existing one-two storey residential context. The proposed heights respond to the topography of the site which falls and rises 6m towards the centre of the lands which holds a shared SUDS and associated riparian zone. Heights and massing of 4 storeys are proposed to provide surveillance of this large open spaces on each side of the natural landscape, with complementary massing strategies north and south to provide a coherent edge.

7.23. We note Objective PM42 which aims to: *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 (2020) issued under section 28 of the Planning and Development Act, as amended.*

7.24. Considering the above objective the Development Plan aligns itself with Section 28 guidelines issued by the Minister. We have addressed the relevant provisions of these guidelines in Section 5.0 of this document and in the enclosed documentation.

7.25. The proposed development will contribute to the achievement of the wider objectives of Chapter 3 through the delivery of a high quality residential scheme with a variety of unit sizes/types to meet the future resident's needs, and carefully considered private, communal and public open spaces.

Settlement Strategy

7.26. The preparation of a Housing Strategy is a mandatory requirement under the Planning and Development Act, 2000 (as amended). The entire Strategy is included as Appendix 1 of the Development Plan.

7.27. The provision of a mix and range of housing types is essential to accommodate the housing needs and expectations of the County's residents.

- 7.28. The Development Plan refers to a number of documents *Delivering Homes Sustaining Communities* (2007), *Quality Housing for Sustainable Communities* (2007), *Sustainable Urban Housing: Design Standards for New Apartments* (2015, 2018 and 2020), *Sustainable Residential Development in Urban Areas* (2009), *Urban Design Manual a Best Practice Guide* (2009) and *Government Policy on Architecture* (2009). These guidelines relate to all residential units regardless of their type or location

Objective PM37 *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.*

Objective PM38 *Achieve an appropriate dwelling mix, size, type, tenure in all new residential developments.*

Objective PM39: *Ensure consolidated development in Fingal by facilitating residential development in existing urban and village locations.*

Objective PM40: *Ensure a mix and range of housing types are provided in all residential areas to meet the diverse needs of residents.*

Objective PM41: *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.*

- 7.29. In response to PMS37, the proposed development responds to its location proximate to the town of Skerries providing linkages with the neighbouring residential areas. The proposed layout will create a sense of place through the creation of new spaces while respecting the existing context of the site and responding to the emerging patterns of development. The scheme creates people friendly streets and spaces through legible new public open spaces that connect the distinct character areas within. Key to these are a sequence of interconnected shared courtyards providing secondary 'outdoor rooms' leading to the riparian strip green link.
- 7.30. In response to PMS38 and PMS40, as set out within the documentation the proposed development supports the achievement of the above objectives, for example a broad mix of unit types and sizes are provided including:
- 84 no. 1-bed units,
 - 104 no. 2-bed units (68 no. 2-bed apartments and 36 no. 2-bed duplexes),
 - 157 no. 3-bed units (118 no. 3-bed duplexes and 39 no. 3 - bed houses)
- 7.31. The above factors have influenced the design process resulting in a high-quality development which will have a sense of place for future residents.
- 7.32. It is submitted that the proposed development is consistent with the objectives and vision of Fingal County Development Plan Core and Housing Strategies, therefore ensuring consistency with National and Regional policy.
- 7.33. In response to PM41, the proposed residential development proposes a suitable density of 52 units per ha to optimise use of the lands which are zoned and accessible by a range of means contiguous to the urban extent of Skerries. In this way the proposed development will support the growth and vitality of Skerries by providing additional accommodation to its residents.

Zoning

- 7.34. The subject site is zoned Residential Area (RA) with the objective "*Provide for new residential communities subject to the provision of the necessary social and physical infrastructure*" in the Fingal County Development Plan 2017 – 2023. The Vision set out

in the Development Plan is to “*Ensure the provision of high quality new residential environments with good layout and design, with adequate public transport and cycle links and within walking distance of community facilities. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities*”.

- 7.35. The following uses are permitted in principle under this zoning objective (page 390 of the Plan):

*“Amusement, Arcade, Bed and Breakfast, Betting Office, **Childcare Facilities**, Community Facility, Education, Funeral Home/Mortuary, Guest House, Health Centre, Health Practitioner, Hospital, Office Ancillary to Permitted Use, Office ≤ 100sqm, Office > 100sqm and < 1,000sqm, Open Space, Place of Worship, Public House, Public Transport Station, Recreational Facility/Sports Club, **Residential**, Residential Care Home/ Retirement Home, Restaurant/Café, Retail - Local < 150 sqm nfa, Retail - Convenience ≤ 500 sqm nfa, Retail - Comparison ≤ 500 sqm nfa, Retail - Supermarket ≤ 2,500 sqm nfa, Retirement Village, Sheltered Accommodation, Sustainable Energy Installation, Taxi Office, Traveller Community Accommodation, Utility Installations, Veterinary Clinic.*

- 7.36. It is noted that both of the uses proposed as part of this planning application are permitted in principle under the zoning objective.

- 7.37. Local Objective 10 aims to: *Provide for the design of the proposed southern relief road from a roundabout connection on the Rush Road (R128) westwards as far as the railway crossing, as a tree-lined urban road, incorporating wide footpaths, verges, cycle paths and extensive tree-planting. Road embankments shall be attractively landscaped. West of the railway line to its connection with the Lusk Road (R127), the relief road shall be attractively landscaped in keeping with its rural setting, including the carrying out of an Archaeological Appraisal in advance of all works commencing.”*

- 7.38. The indicative route of the southern relief road is located to the south east of the proposed development boundary along Golf Links Road. The proposed development will not compromise the delivery of this road in the future. The site has frontage at this location and includes improvements on the existing condition.

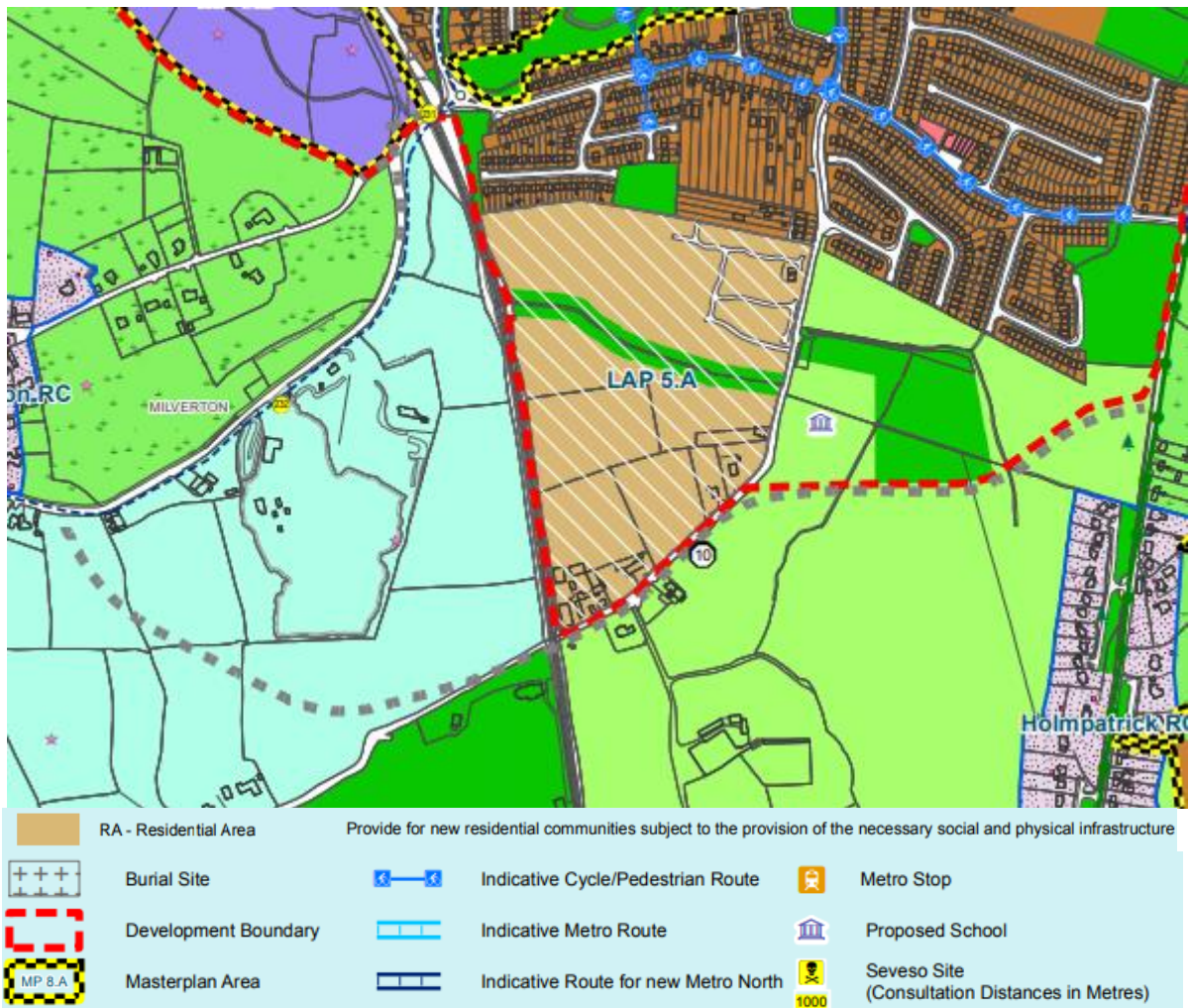


Figure 7.2: Extract of Zoning Sheet 6 – Fingal County Development Plan 2017-2023. (Indicative site boundary outline in navy)

- 7.39. The Development Plan notes that Residential Areas should “Ensure the provision of high quality new residential environments with good layout and design, with adequate public transport and cycle links and within walking distance of community facilities. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities”.
- 7.40. In accordance with the zoning for the site, the proposed development provides for 345 no. residential units comprising of 84 no. 1-bed units, 104 no. 2-bed units (68 no. 2-bed apartments and 36no. 2-bed duplexes), 157 no. 3-bed units (, 118 no. 3-bed duplexes and 39 no. - bed houses) ranging in height from 2 no. – 4 no. storeys a childcare facility of 377 sqm on the lands zoned RA. The proposal also includes public transport and cycle links notably providing connectivity to the Skerries train station and town centre to the north. The proposal includes social and affordable housing under Part V provisions. As detailed in this Report and enclosed documentation the proposed development supports the achievement of the zoning objective for the site.

Residential Density

- 7.41. The Fingal CDP addresses residential density at page 71. It states as follows: “In determining densities, regard should be given to Sustainable Residential Development in Urban Areas (2009) and its companion document Urban Design Manual. The Council promotes higher densities at suitable locations such as along public transport corridors and in main town centres”. The Fingal CDP includes the following objective:

Objective PM41 - 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.

- 7.42. Density is a key development parameter and has been carefully considered by the design team. Areas of increased density have been located at key locations within 1km of the Skerries train station, in order to achieve the optimal use of the land in the without compromising residential amenity of future users. The proposed scheme achieves a good balance in this regard resulting in a high-quality design and sense of place for future residents. A variation of densities is proposed which allow a higher density area to the north, in closer proximity to the train station, and an appropriate transition in height and density to the south and east, adjacent to the existing residential areas along Golf Links Road. Essential separation distances and high-quality boundary treatments are provided in this area to ensure residential amenities are protected.
- 7.43. The northern portion of the development is the primary entrance to the scheme and has been designed to serve a number of functions, including catering for the demands of a vibrant new community and integrating with the existing built fabric. The townhouse units at this location have been carefully developed to provide greater density and variety, in response to the challenging topography and to create a new street at the heart of the scheme which will become the arrival point. Through the creation of this new street they also form a definitive edge to the park and eco corridor north of the proposed development. The four story elements (Blocks A1/A2) at this location are the tallest volumes onsite. All units are dual aspect and will benefit from excellent views across the shared park space to the north and eastward to the sea. Due to the topography these terraces are not imposing and sit naturally within the rolling landscape as evidenced by the sections. These terraces will have a three storey presence to the street.
- 7.44. High quality landscaping proposals are proposed with mixture of soft and hard surfaces, to provide opportunities for play and relaxation. All spaces are well overlooked and have good orientation. In addition to the communal spaces, all apartment units also have their own dedicated balcony/ terrace equal to, or in excess of, the private open space standards set out in the Apartment Guidelines and 100 % are dual aspect.
- 7.45. The Architectural Design Statement and the Landscape Design Statement set out the approach the development which demonstrate that the proposed density finds a suitable balance and will result in a distinct sense of place.
- 7.46. The proposed scheme seeks to provide 345 no. units on a net developable area of 6.6 ha which equates to a density of 52 uph.
- 7.47. The scale and density of development proposed is considered appropriate in the context of Skerries train station (850m or 10 minute walking distance to northern site boundary), and the proximity of the site to Skerries town.
- 7.48. The site is situated within a public transport corridor, i.e. within a 1km catchment of a railway station, for which the Guidelines for Sustainable Residential Development in Urban Areas (2009) recommend a minimum net residential density of 50 units per hectare. The proposed scheme is considered to be in compliance with the 2009 Guidelines.

Housing Mix

7.49. The Fingal CDP includes the following objective with regard to housing mix:

Objective PM38 - *Achieve an appropriate dwelling mix, size, type, tenure in all new residential developments.*

Objective PM40 - *Ensure a mix and range of housing types are provided in all residential areas to meet the diverse needs of residents.*

7.50. The proposal includes a sustainable mix of units which contribute to sustainable communities on the site and respond appropriately to the current market demands. As noted within the NPF, household sizes are declining at present, contributing to an increased need for smaller residential units, particularly in the form of apartments. This situation is reflected in the more recent Apartment Guidelines 2020 and the proposed unit mix accords with SPPR1 of those Guidelines. The following mix of houses and apartments are provided:

- 84 no. 1-bed units,
- 104 no. 2-bed units (68 no. 2-bed apartments and 36 no. 2-bed duplexes),
- 157 no. 3-bed units (118 no. 3-bed duplexes and 39 no. 3 - bed houses)

Development Management Standards:

7.51. Chapter 12 set out development management standards for the County.

Green Roofs / Walls

7.52. Objective DMS16 states: *Promote and encourage the use of green walls and roofs for new developments that demonstrate benefits in terms of SuDS as part of an integrated approach to green infrastructure provision*

7.53. Objective DMS17 *Promote and encourage the use of green walls and roofs as part of an integrated approach to green infrastructure provision.*

7.54. Landscape proposal for this development includes swales, permeable paving and road swales/raingardens. The proposed development will connect with the swale which is part of a separate planning application Reg. Ref. F21A/0287 (ABP Reg. Ref. 312189-21). We propose permeable paving for all parking spaces to accommodate for surface water run-off. Along the main avenue there is a provision for swales (raingardens) which are a functional feature and add a green and natural effect to the streets. For details please refer to the engineering drawings and reports.

7.55. In response to the above DMS17, Green roofs have been included on the apartment buildings and the Creche.

Apartment Development

7.56. In general terms, the Development Plan sets out the following objectives for Apartment Developments within the County:

Objective DMS20 - *Require the provision of a minimum of 50% of apartments in any apartment scheme are dual aspect.*

Objective DNS21 - *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.

Objective DMS22 - Require a minimum floor to ceiling height of 2.7 metres in apartment units, at ground floor level.

Objective DMS23 - Permit up to 8 apartments per floor per individual stair/lift core within apartment schemes.

- 7.57. The proposed development provides for 345 no. units, consisting of 305 no. apartment/duplex units, all of which are dual aspect. The proposal achieves 100% dual aspect apartment units which greatly exceeds DMS20 and the standards of the Apartment Design Guidelines.
- 7.58. In compliance with DMS22, the proposed development provides for a minimum of 2.7m floor to ceiling heights at ground floor.
- 7.59. In compliance with DMS23, the scheme does not provide more than 8 no. units per stair core. Therefore, the proposed development is compliant with both the Development Plan requirement for apartments, and with the Section 28 Apartment Guidelines (2020).

Quantitative Standards

- 7.60. In general terms, the Development Plan sets out the following objectives for Apartment Developments within the County:

Objective DMS24 - Require that new residential units comply with or exceed the minimum standards as set out in Tables 12.1, 12.2 and 12.3.

Objective DMS25 - 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%.

Objective DMS26 - For apartment schemes between 10 and 99 units, require that the majority of all apartments in a proposed scheme 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%. This may be redistributed throughout the scheme, i.e. to all proposed units.

Objective DMS27 - Require that all planning applications for residential development include floor plans for each room indicating typical furniture layouts and door swings.

- 7.61. Please refer the Housing Quality Assessment which has been prepared by O'Mahoney Pike Architects which sets out the compliance of each of the residential units with the above housing standards.
- 7.62. The proposed development meets or exceeds the provisions for private amenity space outlines in Table
- 7.63. The following range in the size of apartment units are proposed:
- 1 bed units range from 50.4-56.8 sqm
 - 2 bed units range from 68.5 – 94.1 sqm
 - 3 bed units range from 104 - 125.3 sqm
- 7.64. In compliance with DMS25 the majority of apartments exceed the gross floor space standards by 10% as illustrated in the OMP Schedule of Areas.

- 7.65. In compliance with DMS26 floor plans for each unit indicate typical furniture layouts and door swings.

Separation Distances

- 7.66. The Development Plan sets out the following objectives in relation to separation distances:

Objective DMS28 - *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.*

Generally, separation distance between the each of the proposed units is equal to or greater than 22m. However, in the few instances where the separation distance is below 22m, appropriate mitigation measures have been incorporated into the design such as staggering opposing windows to ensure privacy.

- 7.67. Objective DMS29 states: *Ensure a separation distance of at least 2.3 metres is provided between the side walls of detached, semi-detached and end of terrace units.*
- 7.68. Please Refer to Architectural Site Drawings 19020A-OMP-00-00-DR-A-1100 and individual Tiles prepared by OMP which illustrated that a minimum of 2.3 m provided between the side walls of all houses.

Daylight, Sunlight and Overshadowing

- 7.69. The Development Plan sets out the following objective in relation to Sunlight/Daylight:

Objective DMS30 - *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.*

- 7.70. The introduction to these guidelines sets out clearly that these guidelines are meant to be guidelines and are not mandatory standards to be met. In this regard the following quote is taken from Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (B.R.209, 2011) where it states in para. 1.6 :

“The guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design.”

- 7.71. As set out in the enclosed Sunlight Daylight Report prepared by Axis, and has been summarised above in the section dealing with consistency with the Apartment Guidelines, the proposed development generally performs very well when tested against the guidance values as set out in the BRE Guidelines and with the EN standards. Accordingly, we would respectfully submit that our proposed development is in compliance with the development plan objective DMS30.

Acoustic Privacy

- 7.72. The Development Plan sets the following objectives in relation to the management of apartment schemes:

Objective DMS31 - *Require that sound transmission levels in semi-detached, terraced, apartments and duplex units comply as a minimum with the 2014 Building Regulations Technical Guidance Document Part E or any updated standards and evidence will need to be provided by a qualified sound engineer that these levels have been met.*

- 7.73. A Noise Assessment of the proposed development has been prepared by RedKite which forms part of the EIAR (see Chapter 10) and states that:

“It is envisaged that the development will achieve good internal noise conditions for resting, sleeping etc with open or partially opened windows throughout 94% of the proposed development. The remainder will achieve reasonable to good conditions internal noise conditions for resting, sleeping etc with open or partially opened windows. Nevertheless, a minimum moderate level of sound insulation for glazing will be installed to future proof the development.”

Refuse

- 7.74. Objective DMS36 states: *“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”*
- 7.75. Please Refer to Site Layout Drawing prepared by OMP dwg 19020A-OMP-00-00-DR-A-5000_Bin Stores, Bike Stores & Sub Station showing refuse storage areas which are suitably located for convenient access.
- 7.76. Objective DMS37 aims to *“ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres”*. Please refer to dwg. No. 19020A-OMP-00-00-DR-A-5000_Bin Stores, Bike Stores & Sub Station ‘Bin Strategy’ of the OMP Design Statement which details locations of bins stores which illustrates that travel distances to bin stores do not exceed 50m.

Management Companies and Facilities for Apartment Developments

- 7.77. The Development Plan sets out the following objectives:

Objective DMS33 - *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.*

Objective DMS34 - *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.*

- 7.78. An Operational Waste Management Plan has been prepared by TMS and submitted with the application demonstrating compliance with these requirements. The OWMP provides a strategy for at source segregation, storage and collection of all wastes generated within the development during the operational phase. As set out a The Facility Management Company for the residential development will maintain a register of all waste volumes and types collected from the development each year including a break-down of recyclable waste and where necessary, shall introduce initiatives to further encourage residents to maximise waste segregation at source and recycling.

- 7.79. The proposed development includes a creche which is in line with Objective DMS34 above.

Open Space

- 7.80. The Development Plan addresses Open Space in section 3.5 of Chapter 3 Placemaking and in section 12.7 of Chapter 12 Development Management Standards.

As set out In Chapter 3 of the Development Plan, section 3 The Fingal Development Plan 2011-2017 marked a move from quantitative provision of open space towards a greater emphasis on qualitative provision. This Plan continues with this approach and incorporates five basic principles of open space provision: Hierarchy, Accessibility, Quantity, Quality and Private Open Space. In doing so the Plan sets out policies and objectives for the provision of a hierarchy of high quality, attractive and secure public and private open spaces, ranging from regional parks and major local parks down to smaller pocket parks, private gardens and balconies, as well as intensive recreational, amenity and community facilities such as active Recreational Hubs and Multiple Games Areas (MUGAs).

- 7.81. The landscape proposals can be summarised as follows:
- 7.82. The landscape design aims to utilise the existing contours in order to cater for a natural water run-off that supply the main water attenuation areas and enhance the vibrancy of the landscape. Landscape areas can be attractively planted and presented as areas that will attract insects. Gradual and attractive slopes designed to provide a useable space can be used for both habitats and as informal amenity. Wetland and meadow typologies surrounding the mown grass zones will enhance biodiversity and allows closer interaction between humans and the natural world.
- 7.83. The intention of the public square is to provide a place of common use and integration for all future residents as it acts as the heart of development. The main route through the area is paved and acts as a place to meet, bounded by terraced landscape which becomes the main visual element of the design. It wraps around the green area and creates enclosure for seating and playing. The play area is located centrally within the square, suitably distanced from the houses while being overlooked by them. Play area provides equipment for all ages and is surrounded by a generous kickabout area. A central lawn is complimented with trees and meadow to enhance biodiversity and encourage users to interact with nature.
- 7.84. Planting proposed within the development will be in line with National Pollinators Guide for wildlife and small gestures such as insect hotels are also proposed to be located in several locations within the meadow area. Houses fronting directly to the square, as well as ground floor apartments overlooking it, are offered a degree of privacy by providing a generous, light and airy buffer planting along their terraces, filtering the views inwards while not depriving them of light and views outwards.
- 7.85. There are two communal courtyards located between Block E and Block F. Both courtyards are designed to have a similar character with the exception that courtyard in Block E is on podium and requires a sensitive approach. The offering here is a planted courtyard, with plenty of seating, informal play, adult exercise stations and some communal furniture. The design aims to retain a degree of openness as well as privacy.
- 7.86. In Block E Planting such as grasses and herbaceous perennials will add texture, depth and form to the space while also being a tool in creating privacy. Seven tree boxes are

proposed on top of the columns in podium in order to accommodate tree planting. Proposed trees include light, ornamental species such as Magnolia or Amelanchier.

- 7.87. In Block F, there is more opportunity in creating a lush green spaces as we propose more various trees both in their character as well as size. Minimalistic and natural play elements such as stepping stone are meandering through vegetation providing a sense of adventure and giving it an informal character. A portion of grass is retained for kickabout area, picnics, etc. Paving integrated between the green islands is designed to give direction coming from all sides of the surrounding houses and operates as a directional guide.
- 7.88. The Linear Park located along the eastern boundary of the site aims to regenerate and enhance biodiversity while encouraging people to integrate with nature and wildlife. It is our landscape approach to retain the existing hedgerow, which is already up to 4m thick in sections and secure its ecological value by proposing new planting alongside. This area becomes an important corridor within the landscape of this development, both for ecology and residents en-route towards the station.

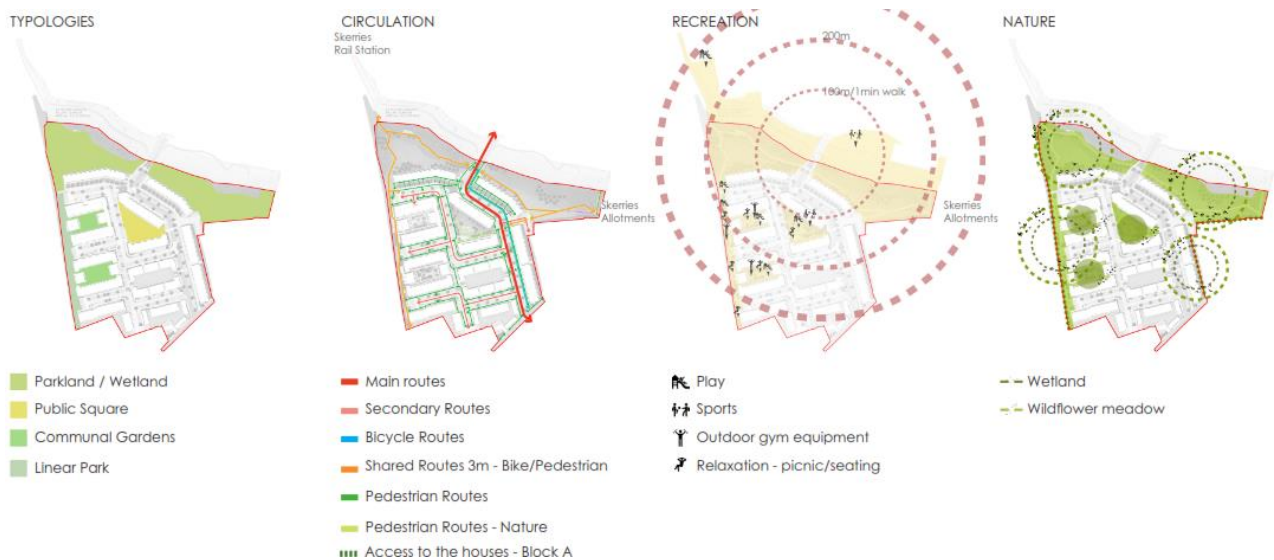


Figure 7.4: overview of Landscape concept development (Source: BSLA, 2022).

- 7.89. In regard to the quantity of open space we note the following objectives.

Objective PM52 states

“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.”

- 7.90. Accompanying text states:

“Provide sufficient quantities of open space and recreational facilities. For all developments with a residential component, the overall standard for public open space provision is a minimum 2.5 hectares per 1000 population. In general this shall be provided at a ratio of 75% Class 1 and 25% Class 2. In order to provide existing and future communities with adequate recreational and leisure opportunities, the Council will employ a flexible approach to the delivery of public open space and more intensive recreational/amenity facilities. It is the intention of the Council, however, to ensure, except under exceptional circumstances, public open space provision exceeds 10% of

a development site area. The development site area cannot include lands zoned RU, GB, OS or HA.”

7.91. In Chapter 12 of the Development Plan, section 12.7 states:

“For all developments with a residential component, the overall standard for public open space provision is a minimum 2.5 hectares per 1000 population. In order to provide existing and future communities with adequate recreational and leisure opportunities, the Council will employ a flexible approach to the delivery of public open space and more intensive recreational/ amenity facilities. It is the intention of the Council, however, to ensure, except under exceptional circumstances, public open space provision exceeds 10% of a development site area. The development site area cannot include lands zoned RU, GB, OS or HA.”

7.92. The following objectives in relation to open space are set out in Chapter 12:

Objective DMS56 – *Integrate and provide links through adjoining open spaces to create permeable and accessible areas, subject to Screening for Appropriate Assessment and consultation, including the public, as necessary.*

Objective DMS57 – *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.*

Objective DMS57A - *Require a minimum 10% of a proposed development site area be designated for use as public open space. 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.*

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 space ‘accessibility from homes’ standard specified in Table 12.5

Objective DMS57B *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.*

- 7.93. The requirement of public open space for the subject site under Objective PM52 and Objective DMS57 equates to 2.1 ha ($2.5 \times [(177 \times 1.5) + (168 \times 3.5)] = 850 / 1000$). The provision of open space of this scale would not result in a satisfactory urban design response to the site in terms of density and site coverage.
- 7.94. The proposed development provides for 1.67 ha of Public Open Space (25% of the total site area). The development also connects with the proposed open space associated with the advance infrastructure application, which includes passive open space. This was permitted by FCC but is now under appeal to the Board.
- 7.95. The open space provision of 1.67 ha falls short of that required by Objective PM52 and Objective DMS57. The provision of Open Space meets the 10% requirement in Objective DMS57A and Objective DMS57B. However as set out above falls short of the required for 2.1 ha as set out in Objective DMS57A and Objective DMS57B provide for a discretion in respect of the shortfall. Should the Board consider that the open space provision as a material contravention of the Development Plan in relation to the quantum of Open Space, justification for the grant of permission is set out in the Material Contravention Statement.
- 7.96. The proposed open space has been designed in proportion to the scale of the development, the site context and the needs of future / existing residents. The proposed development will result in the provision of high quality open space which has been designed as part of the urban design strategy. Additional open space would provide a poor urban design response to the site resulting in a sub-optimal use of land and would reduce the proposed density below an acceptable standard.
- Objective DMS59 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*
- 7.97. As set out in BSLA drawing DN1906_BSLA_LDA_SHD_Landscape Detail - Play Provision all units are within 150m of the central public open space or the public open space to the north.
- Objective PM60 Ensure public open space is accessible, and designed so that passive surveillance is provided.*
- 7.98. As widely described in BSLA's landscape documentation all open spaces are suitably overlooked and in close proximity for all residents.
- Objective PM61 Ensure permeability and connections between public open spaces including connections between new and existing spaces, in consultation to include residents.*
- 7.99. In compliance with PM61 all the recreational offerings are connected by a series of pathways forming a coherent network of routes Figure 7.5. In the landscape strategy has been prepared in tandem with the Advance Infrastructure works to the north which complements the proposed development through provision of a sizable open space area and network of paths. The proposed development will also allow connections to the site to the Skerries allotment gardens to the east.
- 7.100. Destinations that can be reached on foot, such as Skerries Railway station or the Allotments beyond the site's boundaries compliment the notion of a life lived more independently of private car use, even more so if the journey can be undertaken off main roads.



Figure 7.5: network of routes (Source: BSLA, 2022).

Objective PM62 Provide multifunctional open spaces at locations deemed appropriate providing for both passive and active uses.

7.101. The proposed development complies with Objective PM62, a range of types sizes and types of spaces are proposed, this is illustrated in Figure 7.6 below. As set out in the BSLA's design statement:

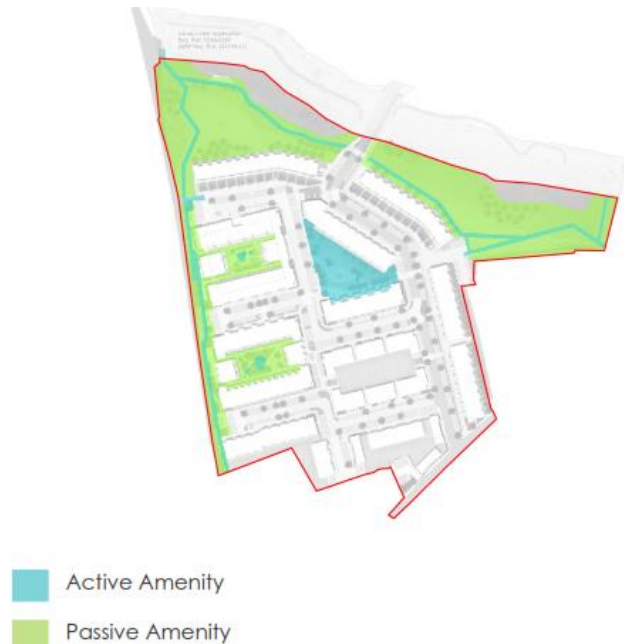


Figure 7.6: passive and active amenity areas (Source: BSLA, 2022).

- 7.102. Objective DMS62 states: *Areas of open space of less than 500 square metres will not be taken in charge by Fingal County Council for maintenance purposes.*
- 7.103. The proposed development complies with Objective DMS62, as set out in BSLA Landscape Design Statement - Page 9 all open spaces to be taken in charge are more than 500 square metres.
- 7.104. Objective DMS63 states: *The Council will require that open space be provided in a form and layout which facilitates maintenance.*
- 7.105. The proposed development complies with Objective DMS63, open spaces have been considered for maintenance with gradual slopes of more than 1:5 for accessible maintenance. Planting proposals for different planting groups will be developed in the detailed stages of the project and will be carefully considered to fulfil its function and easy maintenance.
- 7.106. Please refer to DN1906_BSLA_LDA_SHD_Landscape Detail – Site sections.
- Objective DMS64 The design of areas to be taken in charge as public open space should vary according to the density of the development. More ornate and maintenance intensive designs are not appropriate to low density development.*
- 7.107. The proposed development complies with Objective DMS64, the proposed design of open areas to be taken in charge are suitable for this purpose.
- Objective DMS66 Ensure open spaces are not located to the side or the rear of housing units.*
- 7.108. The proposed development complies with Objective DMS66. As set out in DN1906_BSLA_LDA_SHD_Landscape Masterplan PV open spaces are not located to the side or the rear of housing units. Please refer to : DN1906_BSLA_LDA_SHD_Landscape Report - Page 9 for further detail which also describes the basis for open space calculation.

Objective DMS67 Ensure open space provision is suitably proportioned and inappropriate narrow tracts are not provided

- 7.109. The proposed development complies with Objective DMS67 As set out in BSLA drawing DN1906_BSLA_LDA_SHD_Landscape Masterplan PV and associated OMP drawings which describe public open spaces are suitably proportioned and inappropriate narrow tracts are not provided. Please refer to: BSLA Design Report - Page 9

Green Infrastructure and Natural Heritage

- 7.110. The Development Plan identifies a number of key Green Infrastructure (GI) themes. These are:

- Biodiversity
- Parks, Open Space and Recreation,
- Sustainable Water Management,
- Archaeological and Architectural Heritage,
- Landscape.

- 7.111. Under each of these headings the Council has identified and mapped the key elements of the County's strategic green infrastructure on the Development Plan maps, under each of the five GI themes. The proposed development makes a contribution to the green infrastructure through the proposed landscape design which can be summarised as follows:

- 7.112. The key aspects of landscape strategy in relation to the provisions of the Development Plan can be summarised as follows:

Biodiversity

- 7.113. The railway bounds the site to the east and forms a continuous wildlife corridor with its heavily vegetated banks. We are proposing to widen the corridor further and permit both walking and cycling along stretches of it. Importantly to the north it continues through the Noonan Construction Scheme and beyond through Hillside Gardens to Millers Lane, offering a tranquil route towards Skerries railway station, albeit the last portion on public road.

- 7.114. This scheme is actively enhancing and retaining hedgerows both for their shelter and food source values, for birds and invertebrates. Where possible we intend to thicken out these edges with berrying and native planting along a pedestrian pathway that will run alongside, adding additional nesting sites through the woody mixes, with new bat boxes and taking care of the lighting and the need to minimize its spill beyond where strictly needed. We will use species like holly, dog rose and honeysuckle in these mixes. The continuous corridor along the railway will also connect to an array of connected green spaces throughout the site forming a linked habitat network.

Parks, Open Space and Recreation

- 7.115. All the recreational offerings are connected by a series of pathways forming a coherent whole and enabling loops of varying length along mown paths, hoggin paths and footpaths. A further advantage is that this joint greenspace, more than 50% which is with this application site, is that it also connects the site to the Skerries allotment gardens to the east. Destinations that can be reached on foot, such as Skerries Railway station or the Allotments beyond the site's boundaries compliment the notion

of a life lived more independently of private car use, even more so if the journey can be undertaken off main roads. This generosity of scale in the parkland to the north means that the triangular central open space will occupy a different place within the open space hierarchy. As the active recreational allocations are elsewhere, the main playground and the Muga pitches across on the neighbouring site this area now becomes a quieter space with good planting, plenty of seating and is treated as a communal outdoor meeting space for residents. The planting is more domestic, and the trees arranged to the edges, freeing the centre for younger children, still of an age to be under parental supervision to play informally with a ball or the family pet.

- 7.116. The design also permits beds to be created at the edges between hard landscape that will have perennials and edible fruiting shrubs such as Blackcurrants, Redcurrants and thorn less Jostaberries so that residents can enjoy the notion of foraging on a small scale, still tidy and neat. Landscape terraces are the linking feature, enabling a degree of mounding and falling and rising to protect social clusters of seating where residents can also improvise for outdoor dining or get together.
- 7.117. The Public Open Space which is 16,670 sqm in size. The landscape design aims to utilise the existing contours in order to cater for a natural water run-off that supply the main water attenuation areas and enhance the vibe of the landscape by their presence. These areas can be attractively planted and presented as areas that will attract insects. Gradual and attractive slopes designed to provide a useable space can be used for both habitats and as informal amenity. The approach has been coordinated with the adjacent Noonan Construction site to encourages clear landscape connections and mutual visual links as it ensures that a functioning and offering rich in amenity can be maximised to benefit both sides.
- 7.118. The intention of the public square at the centre of the scheme is to provide a place of common use and integration for all future residents as it acts as the heart of development. The play area is located centrally within the square, suitably distanced from the houses while being overlooked by them. Play area provides equipment for all ages and is surrounded by a generous kickabout area. Planting proposed within the development will be in line with National Pollinators Guide for wildlife.
- 7.119. There are two semi private courtyards proposed between Block E and Block F 2,272 sqm in size. Both courtyards are designed to have a similar character with the exception that courtyard in Block E is on podium and requires a sensitive approach. The design aims to retain a degree of openness as well as privacy.
- 7.120. The Linear Park which is 2,427 sqm is located along the western boundary of the site. The approach to retain the existing hedgerow and secure its ecological value by proposing new planting alongside.
- 7.121. All the open spaces are connected by a series of pathways forming a coherent landscape strategy and enabling loops of varying length along mown paths, hoggin paths and footpaths. The landscape design for the public realm offers a clear separation between public and private spaces by providing a soft treatment detail to the facades as well as a change of materiality at the threshold of the houses where possible.
- 7.122. We also note the following objectives in relation to play space
- **Objective DMS75** *Provide appropriately scaled children's playground facilities within residential development. Playground facilities shall be provided at a rate of 4 sq 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.

- **Objective DMS76** 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 of playground.

7.123. As illustrated in Figure 7.7 below. Extensive play space has been provided throughout the development including:

- Formal play within this development comprises to 163m²
- Informal play within this development comprises 3,656m²

7.124. Please see landscaping proposals enclosed by BSLA for full details.

7.125. However in quantitative terms the level of playground provision and the number of pieces of playground equipment proposed are less than the development plan standards, and thus the Board may consider this to be a material Contravention of the Development Plan. A justification for same is provided in the Material Contravention Statement.

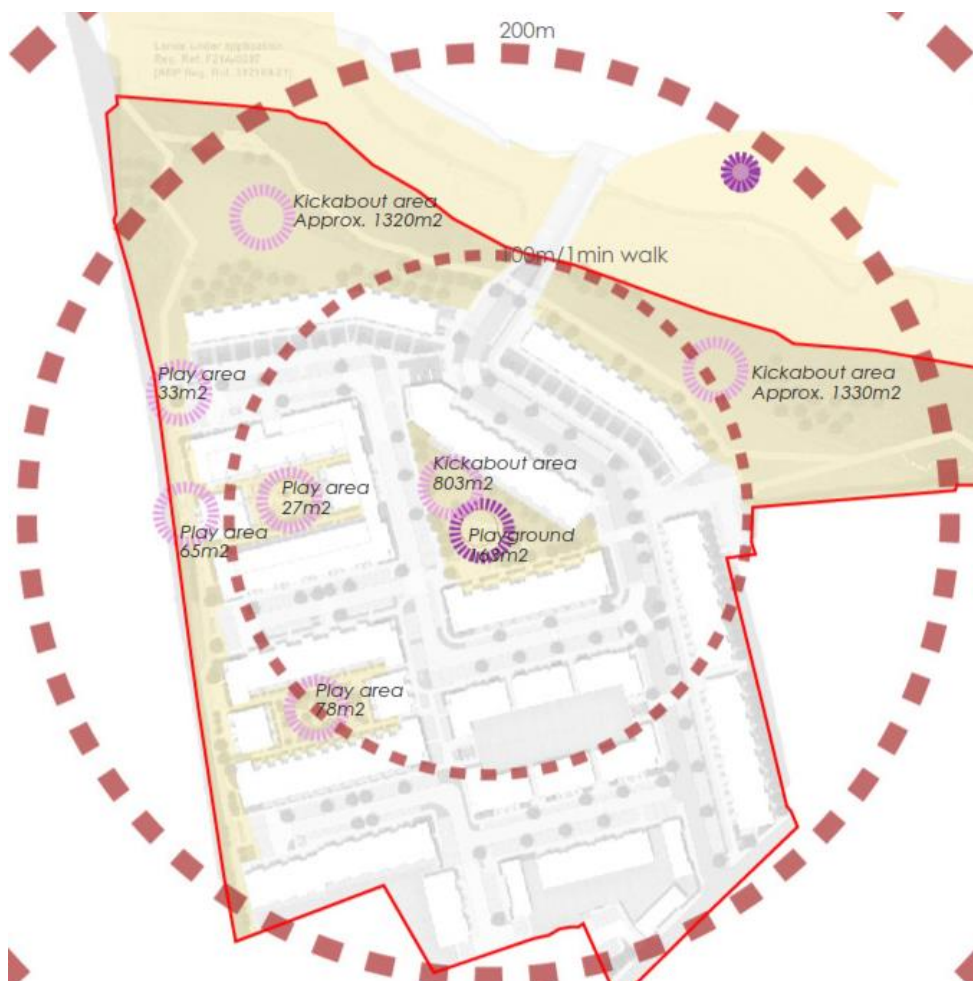


Figure 7.7: location of play spaces (Source: BSLA, 2022).

7.126. We note the following objectives in relation to trees and hedgerows:

- **Objective DMS77** Protect, preserve and ensure the effective management of trees and groups of trees.

- **Objective DMS78** Ensure during the course of development, trees and hedgerows that are conditioned for retention are fully protected in accordance with 'BS5837 (2012) Trees in relation to the Design, Demolition and Construction – Recommendations' or as may be updated
- **Objective DMS79** Require the use of native planting where appropriate in new developments in consultation with the Council.
- **Objective DMS80** Ensure trees, hedgerows and other features which demarcate townland boundaries are preserved and incorporated where appropriate into the design of developments
- **Objective DMS81** Consider in tree selection the available rooting area and proximity to dwellings or business premises particularly regarding shading of buildings and gardens

7.127. In compliance with DMS77, tree protection measures have been set out and existing trees have been incorporated into the design where possible.

7.128. In compliance with DMS78, please see arborist inputs for tree protection and impact assessment which is also summarised below.

7.129. In compliance with DMS79 Native species have been proposed where suitable. Landscape proposal aims to retain the existing hedgerows where possible and integrate them into the design. Hedgerows which form the perimeter boundaries are being retained and complemented with new planting to retain the existing character of the site. Newly proposed trees include native species which enhance the value of wildlife and biodiversity.

7.130. In response to DMS80, the site currently has number of hedgerows and planting with much having an ecological value. As part of development number of existing hedgerows will need to be removed, however none of these hedgerows to be removed demarcate townland boundaries, and the most valuable planting along the site perimeter is proposed to be retained and complemented with biodiversity friendly species as per National Pollinator Guide.

7.131. As set out in BSLA's landscape strategy a significant quantity of planting is proposed as part of the development including native species where appropriate. This planting has been consider in compliance with DMS81.

7.132. Arborist assessment has been carried out by John Morris Arboricultural Consultancy whom summarised the approach in this regard:

"The aim has been to include those arboricultural features that are capable of providing a substantial future contribution in terms of their amenity, landscape, and ecological value, including those that contribute to the landscape character of the local area. These include mature boundary hedgerows and mature self-sown hedgerow trees that help to provide screening and enclosure to the Site.

To mitigate the removal of eleven low quality category C arboricultural features from central areas of the Site, a landscape plan submitted as part of the application proposes a diverse mix of new trees and vegetation across the site to function in harmony with the existing natural and new built environment. This new planting will include species rich native hedgerows and individual specimen trees that will increase species diversity and canopy cover in the local landscape. To mitigate the removal of a single moderate quality category B Ash it is proposed to plant three semi mature Scots Pine in its place.

The location of new and supplementary planting has been strategically positioned to enhance and complement existing features, providing connectivity to trees and hedgerows and green corridors in the wider local landscape for both visual amenity and ecological value. The new planting will include pollinator friendly species in recognition of Fingal County Councils partnership status in the All-Ireland Pollinator Plan, offering benefits in terms biodiversity and to local wildlife. The aim should be to ensure the benefits provided by new planting will increase year on year, therefore reducing the magnitude of impact and creating an improvement on the pre-development baseline. To accelerate the timeframe over which these benefits are realised and to provide an immediate impact, it is proposed to use a mixture of extra heavy standard and semi mature trees, and a variety of rich native mixed species hedgerow planting.”



Figure 7.8: Summary diagram of tree removal and new planting. (Source: BSLA, 2022).

Sustainable Water Management

7.133. We note the following SuDS objectives:

- **Objective DMS73** *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.*
- **Objective DMS74** *Underground tanks and storage systems will not be accepted under public open space, as part of a SuDS solution.*

7.134. Landscape proposal for this development includes swales, permeable paving and road swales/raingardens. The proposed development will connect with the swale which is part of a separate planning application Reg. Ref. F21A/0287 (ABP Reg. Ref. 312189-21). We propose permeable paving for all parking spaces to accommodate for on surface water run-off. Along the main avenue there is a provision for swales (raingardens) which are a functional feature and add a green and natural effect to the streets. For details please refer to the engineering drawings and reports.

7.135. Surface water management proposals are fully detailed in Engineering Services Report prepared by DBFL.

Green Infrastructure

7.136. The Fingal County Development Plan places an emphasises on protecting and enhancing green infrastructure assets throughout the County. The following green infrastructure objectives are considered to be of relevance to the subject lands:

Objective GI108 – “Integrate the provision of green infrastructure with infrastructure provision and replacement, including walking and cycling routes, as appropriate, while protecting biodiversity and other landscape resources.”

7.137. The scheme contains a range of walking and cycling routes throughout the site as illustrated in BSLA’s Landscape Masterplan and DBFL’s TTA. Cycling is an important aspect of the proposed development the main bicycle route runs north south through the site and a shared pedestrian - cyclist path along the western boundary and east-west through the parkland. There is a good provision of bicycle parking allocated within 50 meter distances from the houses.

7.138. The Linear Park located along the western boundary of the site aims to regenerate and enhance biodiversity while encouraging people to integrate with nature and wildlife. As part of this the existing hedgerow is to be retained and developed by proposing new planting alongside. This area becomes an important corridor within the landscape of this development, both for ecology and residents en-route towards the station.

7.139. A shared north-south bicycle / pedestrian connection will be located along the western boundary of the site while a second greenway (east-west orientation) will be located to the north of the site. This will continue eastwards towards Golf Links Road and could cater as a potential future connection to the future school. The internal streets have been designed to comply with DMURS which seeks to encourage active modes of travel.

- **Linkage Type 1** – The Avenue. Streets with generally 6.0m wide carriageways, on-street car parking, parallel dedicated cycle track facilities and footpaths.
- **Linkage Type 2** – Streets generally 6.0m wide carriageways, on-street car parking and adjoining footpaths.
- **Linkage Type 3** – Parking Courtyards with dedicated footpaths
- **Linkage Type 4** – Streets / public realm areas with only pedestrian access permitted access.
- **Linkage Type 5** – Shared pedestrian / bicycle connection



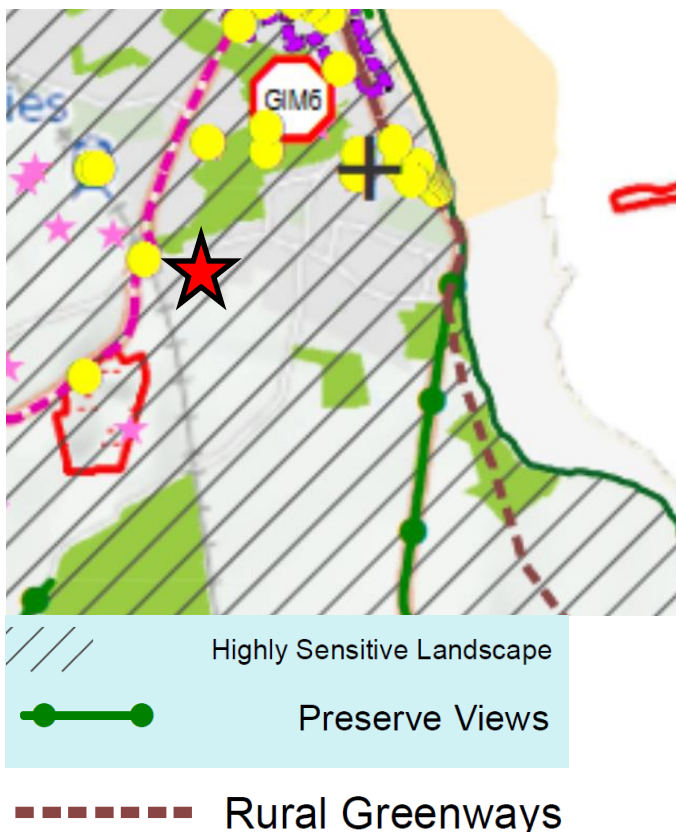
Figure 4.3: Internal Street Hierarchy by Linkage Type

Figure 7.9 Street Hierarchy (Source DBFL 2022)

Objective GI120 – “Require all new development to contribute to the protection and enhancement of existing green infrastructure and the delivery of new green infrastructure, as appropriate.”

- 7.140. The proposed development enhances existing green infrastructure where possible and makes a contribution through planting and landscaped spaces, as detailed in Landscape Design Report and associated drawings prepared by BSLA.
- 7.141. This scheme is actively enhancing and retaining hedgerows both for their shelter and food source values, for birds and invertebrates. Where possible edges will be thickened with berrying and native planting along a pedestrian pathway that will run alongside, adding additional nesting sites through the woody mixes, species such as holly, dog rose and honeysuckle in these mixes. The continuous corridor along the railway will also connect to an array of connected green spaces throughout the site forming a linked habitat network.

- 7.142. In the public square a central lawn is complimented with trees and meadow to enhance biodiversity and encourage users to interact with nature. Planting proposed within the development will be in line with National Pollinators Guide for wildlife and small gestures such as insect hotels are also proposed to be located in several locations within the meadow area.
- 7.143. In Block E Planting such as grasses and herbaceous perennials will add texture, depth and form to the space while also being a tool in creating privacy. Seven tree boxes are proposed on top of the columns in podium in order to accommodate tree planting. Proposed trees include light, ornamental species such as Magnolia or Amelanchier. In Block F, there is more opportunity in creating a lush green spaces as we propose more various trees both in their character as well as size.
- 7.144. Along the linear park, additional naturalistic planting will be extended into the continuous planted runs within the site and allow the wildlife to create their own mini corridors through the site to green corridors, hedgerows, railway embankments and fields beyond. The actual gardens may have non-native planting but they will also be nectar rich sources nonetheless which have the advantage that their flowering seasons may be much longer than the natives.
- 7.145. We note the provisions of Fingal Development Plan Green Infrastructure Maps 14-16 which set out the objectives and designations relating to the County. The following designations of relevance to the subject lands:



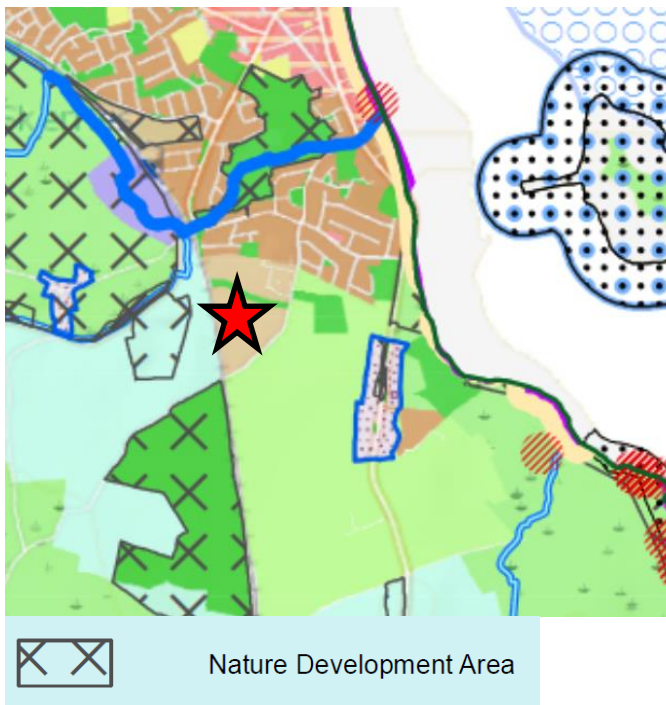


Figure 7.10: FCC GI Map 15 (Source: FCC, 2021)

Landscape

7.146. The Development Plan's Landscape Character Assessment (LCA) provides for the classification of Fingal's landscapes into the following (1) types and values and (2) sensitivities. The LCA divides the County into 6 Landscape Character Types representing generic areas of distinctive character that makes one landscape different from another. The subject lands are within the Coastal Character Type and considered 'highly sensitive'.

7.147. The following 'Landscape Character Assessment Objectives' are stated in the Development Plan:

- *Objective NH33: 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.*
- *Objective NH34: 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 tranquility.*
- *Objective NH35: Resist development such as houses, forestry, masts, extractive operations, landfills, caravan parks and large agricultural/horticulture units which would interfere with the character of highly sensitive areas or with a view or prospect of special amenity value, which it is necessary to preserve.*
- *Objective NH361: 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:*
 - *Causes unacceptable visual harm*

- *Introduces incongruous landscape elements*
- *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.*
- *Objective NH37: Ensure that new development meets high standards of siting and design.*
- *Objective NH38: Protect skylines and ridgelines from development.*
- *Objective NH39: Require any necessary assessments, including visual impact assessments, to be prepared prior to approving development in highly sensitive areas.*

7.148. The LVIA Chapter of the accompanying EIAR prepared by Modelworks provides a detailed landscape and visual assessment of the proposed development. As described in the LVIA: *“The site can be considered to be a ‘site with natural boundaries’, being defined by the railway line to the west, Golf Links Road to the east and south, and the stream valley to the north. There are adjacent buildings (houses and a farm along Golf Links Road) with which development on the site can be ‘clustered’. While the internal field boundary hedgerows are required to be removed to make the site developable, there is potential for retention and supplementation of the vegetation along the railway embankment, and the AI Works proposes tree planting in the valley to the north of the site. These trees to west and north would ‘contain’ the new development as required by the Development Plan policy.”*

7.149. In relation to the designation of the area as a ‘highly sensitive landscape’ Modelworks noted that:

“The above is relevant because (a) the site lies adjacent to the urban area of Skerries, which lies entirely – along with the site – in the Coastal Landscape Character Type, (b) the site is zoned for residential development in the Development Plan (the site is thus valued as a residential land use asset; its development for residential use has been deemed an acceptable landscape change through the process of Strategic Environmental Assessment carried out during the preparation of the Development Plan), and (c) the proposed development is a residential development.

“Therefore, notwithstanding the site’s location in the Coastal Landscape Character Type, for the purpose of this assessment – and in accordance with the GLVIA - the landscape is classified as being of medium sensitivity (to the type of development proposed).

7.150. Further Chapter 6 of the EIAR concludes:

“In conclusion, while there would be some negative impacts on two residential properties adjoining the site, the proposed development would make a significant positive contribution to the evolving landscape/ neighbourhood of Hacketstown, enhancing the urban landscape and visual amenities of the area.”

7.151. On the basis of the above the proposed development is in compliance with Objectives NH33-NH39 and in Fingal’s landscape strategy. Please see Chapter 6 of the EIAR for full assessment of landscape and visual impacts. As outlined above and generally within the BSLA documentation the proposed landscape design will provide a high quality living environment and result in a distinct sense of place.

Green Corridors

7.152. The Development Plan sets out the following objective in relation to green corridors;

Objective DMS71 - *Provide green corridors in all new developments where the opportunity exists.*

7.153. The proposed development retains and enhances the hedgerow along the western boundary of the site which forms part of the linear park to the west, extensive open space is proposed along the northern boundary within the parkland. Providing an east west connection along the site.

7.154. The proposed development has been designed in tandem and to integrate with the advance infrastructure application to the north of the site which provides a riparian corridor. Additional planting is extended into continuous planted runs within the site and allow the wildlife to create their own mini corridors through the site to green corridors, hedgerows, railway embankments and fields beyond. The actual gardens may have non-native planting but they will also be nectar rich sources nonetheless.

7.155. Please refer to the Landscape Design Statement prepared by BSLA for detailed information on the riparian corridor and the public and communal open space areas.

Open Space for Houses

7.156. The Development Plan sets out the following objectives in relation to private open space for houses;

Objective DMS87 *Ensure a minimum open space provision for dwelling houses (exclusive of car parking area) as follows:*

- *3 bedroom houses or less to have a minimum of 60 sq m of private open space located behind the front building line of the house.*
- *Houses with 4 or more bedrooms to have a minimum of 75 sq m of private open space located behind the front building line of the house. Narrow strips of open space to the side of houses shall not be included in the private open space calculations*

7.157. In accordance with DMS87 the open space for houses meet the requisite 60 sqm, see HQA for full detail. For 3 bed houses private open space ranges from 50 – 64.3 sqm

Apartment and Duplex Units

7.158. The Development Plan sets out the following objectives in relation to private open space for apartments and duplexes;

Objective DMS89 - *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.*

Objective DMS90 - *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.*

Objective DMS91 - *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.*

Objective DMS92 - *Permit in appropriate layouts (e.g. courtyard layouts) the provision of a combination of private and semi-private open spaces.*

Table 12.6 – Open Space requirement for Apartment and Duplex Units

	Private amenity space	Communal amenity space
Studio	4 sqm	4 sqm
One bed	5 sqm	5 sqm
Two bed	7 sqm	7 sqm
Three bed	9 sqm	9 sqm

- 7.159. The proposed development is compliant with the above objectives. Please refer to the submitted Housing Quality Assessment prepared by OMP and Typology drawings 19020A-OMP-HT-A1-DR-XX-1000 - 19020A-OMP-HT-E4A-DR-XX-1000 for full details.
- 7.160. Proposed balconies are suitably screened to provide shelter for residents. Interfaces and boundaries between public and private spaces have been carefully considered throughout this development. Where possible landscape proposal includes planted buffers facing on to the public pathways giving the residents sense of privacy and identity. In several places along the linear park, houses facing out to the west get a feeling of ‘living in the park’ with greenery at their front door. Please Refer to Section 4.7 of the BSLA Design Statement which illustrates interfaces between public and private spaces, boundary treatment drawing DN1906_BSLA_LDA_SHD_Landscape Detail - Boundary Treatments PV and Architectural Typology Drawings. Metal or in some instances brick balustrading is used across the scheme.
- 7.161. 2,272 sq.m. of communal open space is being provided to serve the residents of the proposed apartment units. Please refer to layouts for communal areas and references are including the design statement.
- 7.162. Please also Refer to Open Space drawing DN1906_BSLA_LDA_SHD_Landscape Detail - Open Space PV for overview of public open space, communal and linear park.



Figure 7.11 Landscaping Plans (Source: BSLA 2022)

Childcare

7.163. We note Objective DMS94 which states:

“Any application for childcare facilities shall have regard to the following:

- *Suitability of the site for the type and size of facility proposed.*
- *Adequate sleeping/rest facilities.*
- *Adequate availability of indoor and outdoor play space.*
- *Convenience to public transport nodes.*
- *Safe access and convenient off-street car parking and/or suitable drop-off and collection points for customers and staff.*
- *Local traffic conditions.*
- *Intended hours of operation.”*

7.164. A childcare facility of 377sq.m. is included within the proposed development, which has been suitably sized and designed to meet the needs of the proposed development and comply with the development plan requirements. 3 car parking spaces are to be provided for creche staff parking with a further two visitor parking spaces which is in compliance with the development plan requirements. A dedicated outdoor play area is also to be provided. Please see the accompanying Community Audit for further details on the proposed childcare facilities.

Car Parking Standards

7.165. The car parking standards set out for each land use is set out in Table 12.8 of the Development Plan. The requirements for residential development set out in Table 12.8, which are noted as normal standards relative to different unit sizes are as follows:

7.166. We note Objective DM113 aims to:

Limit the number of car parking spaces at places of work and education so as to minimise car-borne commuting. The number of car parking spaces at new developments will be in accordance with the standards set out in Table 12.8. Where demand can be managed by pricing, i.e. retail developments, the pricing should favour shoppers, who generally stay for shorter times, over employees, who generally stay for longer times

7.167. Development Plan text also states:

“Car parking standards provide a guide as to the number of required off-street parking spaces acceptable for new developments. The principal objective of the application of car parking standards is to ensure that, in assessing development proposals, consideration is given to the accommodation of vehicles attracted to the site within the context of existing Government policy aimed at promoting modal shift to more sustainable forms of transport.

The following will be part of the parking standards:

- 1. In the case of any use not specified, the Planning Authority will determine the parking requirements, based on similar uses and first principles.*
- 2. Zone 1 relates to developments within 800m of a QBC or high quality bus service, or 1600m of an existing or planned Luas/DART/Metro/Rail station or within an area covered by a Section 49 Scheme, or in lands zoned Major Town Centre. **Zone 2 relates to all other areas in the County.***
- 3. In mixed use developments, the car parking requirement will take account of different uses having peak parking demands at different times of the day and week.*
- 4. **One space or more per 100 spaces should be reserved for disabled parking bays.***
- 5. **One space or more per 100 spaces should be reserved for electric vehicles with charging facilities.***

Car parking spaces proposed to serve apartment/duplex residential development shall not be sublet or leased to non-residential owners or non-occupiers. Parking spaces provided within the general circulation of a development should not be assigned individually or to a group exclusively in a manner that would impede those areas being taken in charge as public roads.” (JSA Emphasis added).

Land use	Criterion	Proposed	Notes	Category	Norm or Max
Apartment, townhouse 1 bedroom	Unit	1	Plus 1 visitor space per 5 unit	Residential	Norm
Apartment, townhouse 2 bedroom	Unit	1.5	Plus 1 visitor space per 5 unit	Residential	Norm
Apartment, townhouse 3+ bedroom	Unit	2	Plus 1 visitor space per 5 unit	Residential	Norm

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
Pre-School Creche	Classroom	0.5	--	Education	Maximum

Standard per unit	Unit No.'s	Residential Space	Visitor Space
1	84	84	16.8
1.5	93	139.5	27.9
2	167	334	66.8
Required Total Residential and Visitor Spaces			669

7.168. The above car parking standards would equate to a requirement for 669 no. spaces for the residential element of the scheme including 112 no. visitor car parking spaces. Based on the 4 No. classrooms proposed, this equates to a requirement for 4 no. spaces to serve the crèche facility which is provided for within the development.

7.169. The proposed development provides a total of 414 no. on-site car parking spaces. This level of provision is considered to be appropriate to accommodate the demand for both residents and visitors in accordance with the planning requirements. It can be established that the subject development proposals is permitted to provide a maximum of 617 no. on-site car parking spaces within the residential development (476 no. long stay spaces for the apartment/duplex units, 78 no. spaces for the houses and 2 no. spaces at the creche unit) comprising 556 residents spaces and 61 no. visitor spaces in reference to FCC development management standards. In The proposed development's car parking strategy equates to 1.2 spaces per unit on average.

7.170. The proposed 414 no. parking spaces are summarised as follows;

- 368 no. residents spaces comprising:
 - 307 no. standard residential bays,
 - 19 no. disabled bays of which 6 are provided with EV charge points,
 - 42 no standard sized bays with EV charge points
- 40 no. resident visitor spaces
- 5 no. creche parking spaces (which can also be used as additional visitor parking at times when the creche is closed e.g. night time and weekends) comprising:
 - 2 no. spaces allocated to staff (and provided with EV charge points) and
 - 3 no. drop-off / set-down spaces.
- 1 no. Dedicated Car Share (GoCar) bay

7.171. In terms of apartment and houses the following ratios are proposed:

- 1.75 spaces per house
- 1.13 paces per apartment

7.172. The creche unit is allocated 6 no. car parking spaces comprising 3 no. staff spaces and 3 no. drop-off / set-down spaces. The spaces allocated to the staff will be EV integrated.

We note also Objective MT10 *Facilitate the provision of electricity charging infrastructure for electric vehicles both on street and in new developments in accordance with car parking standards.*

- 7.173. A total of 45 no. EV parking spaces are being proposed as part of the scheme proposals equating to 12% of the total number of spaces and greatly exceeds FCC's requirement of one electric vehicle spaces per 100 spaces. Ten of these EV spaces will be located at podium level with Block E. This provision excludes the three EV visitor spaces allocated at the creche facility. The scheme proposals incorporate a total of 19 no. disabled parking bays of which six disabled bays will be EV integrated.
- 7.174. The car parking in the proposed development is less than the normal standard for the residential units set out in Table 12.8. Therefore, the number of car parking spaces provided within the proposed development is considered to be in material contravention of Objective DM113 which provides that the number of car parking spaces at new developments will be in accordance with the standards set out in Table 12.8. Justification for this material contravention is set out in the Material Contravention Statement having regard to the criteria in section 37(2)(b). In particular, the car parking provision is considered to be consistent with the Apartment Guidelines 2020 and 2009 Sustainable Residential Development Guidelines, given the proximity to Skerries train station and town centre services. Please see Material Contravention Statement for full rationale for this provision.
- 7.175. In addition to on-street parking, car parking will also be located at undercroft level within Block E. The scheme proposals include 107 no. car parking spaces at this location of which 10 no. spaces will provide EV charging. Vehicles will be able access / egress the facility via an entrance located at the northern end of Block E.
- 7.176. The proposed developments on-site car parking spaces, including the under croft level, will remain within the control of the appointed management company. A management regime will be implemented by the development's management company to control access to these on-site apartment car parking bays thereby actively managing the availability of onsite car parking for residents and visitors. A parking Management Strategy is set out in Section 5.2 of the TTA.

Bicycle Parking Standards

- 7.177. We note the following objectives in relation to cycle parking standards as set out in Chapter 12 of the Development Plan. The bicycle parking standards set out for each land use is set out in Table 12.9 of the Development Plan. The accompanying text in the Development Plan states:

*“Secure cycle parking facilities shall be provided in new Public Transport Interchanges, Park and Ride facilities, office blocks, apartment blocks, shopping centres, hospitals, etc., in accordance with the standards set out in Table 12.9. Bicycle Parking Stations should be provided in strategic new Public Transport Interchanges. **Where a modal share for cycling is outlined within a Mobility Management Plan for a development, cycle parking should be provided at a level sufficient to support this modal share or as outlined in Table 12.9, whichever is greater.** Secure bicycle racks shall be provided in all cases where bicycle parking is deemed to be necessary by the Planning Authority. Such racks should be within 25m of a destination for short-term parking (shops) and within 50m for long-term parking (school, college, office).*

All long-term (more than three hours) cycle racks shall be protected from the weather. All on-street stands or racks should be capable of performing the basic functions of supporting the bicycle and protecting it against theft or vandalism. Off-street

storage/parking facilities should provide adequate shelter, lighting, safety and security, ease of access and egress, and an appropriate level of supervision. As such, publicly accessible cycle parking should be of Sheffield stand type; toaster racks or similar are not acceptable for publicly accessible cycle parking. Where high-density cycle parking is provided in a secure location, stacked cycle parking is acceptable provided it is easily used.

Guidance for selecting the most appropriate type of bicycle parking facility depending on location and user needs is outlined in the National Cycle Manual, 'Bicycle Parking Facilities'. Fingal County Council will have regard to this document when considering applications where bicycle parking is a requirement."

7.178. The requirements for residential development, which are noted as normal standards relative to different unit sizes are as follows:

Extract from Table 12.9 bicycle parking standards.

Land use	Criterion	Proposed	Notes	Category	Norm or Max
Apartment, townhouse 1 bedroom	Unit	1	Plus 1 visitor space per 5 unit	Residential	Norm
Pre-school facilities / creche	Classroom	0.5		Education	Norm

7.179. This equates to a requirement for 369 no. spaces for the residential element of the scheme comprising 61 no. visitor bicycle parking spaces. Based on the 4 No. classrooms in the crèche this equates to a requirement for 8 No. spaces.

7.180. 802 no. bicycle parking spaces are proposed to serve the development with 128 no. of these bicycle spaces are to serve visitors to the subject site. This provision exceeds the standards in Table 12.8 which are norms rather than maximums and accordingly it is considered compliant with the provisions of the Development Plan.

7.181. A total of 10 no. cycle spaces will be provided to the creche unit comprising 6 no. 'short stay' for parents / visitors and 4 no. 'long stay' staff parking.

7.182. The scheme proposes a total of 670 no. 'long-term' (residents) bicycle parking spaces equating to an overall bicycle parking ratio of 1.94 spaces per unit. A total of 128 no. 'short-term' (visitor spaces) cycle spaces are proposed to be provided at surface level.

7.183. 160 no. long-term residential bicycle parking spaces are to be incorporated in dedicated external storage units (hubs). For houses bikes can be parked in the rear gardens of houses that benefit from dedicated side / rear pedestrian access to the garden. Modal split targets are set out within the TTA and corresponding bicycle facilities required are set out within.

7.184. The duplex / triplex unit benefit from the provision of their own Sheffield stand (In-curtilage spaces comprising some 318 no. bike spaces) immediately adjoining the residential units for Blocks B1, C1 and F.

7.185. The development proposes a total of 122 no 'short-term' spaces in the form 61 Sheffield stands for the residential units. The location of bicycle parking spaces will be conveniently located considering the ideal recommended proximity distances of 25m for 'short stay' cycle parking spaces, and 50m for 'long stay' cycle parking as per best practise recommendations (Figure 7.11). Overall the cycle parking provision will be

safe, secure and convenient for the future residents and compliant with the requirements of the FCC Development Plan. Further details of the location and nature of bicycle storage are set out in the TTA and OMP dwg. No. 19020A-OMP-00-00-DR-A-5000_Bin Stores, Bike Stores & Sub Station.



Figure 5.2: Bicycle Parking Locations

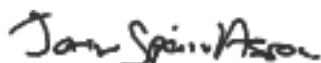
Figure 7.11: extract from TTA Bicycle Parking Locations (Source: DBFL, 2022).

8.0 COMPLIANCE WITH PART V OF THE PLANNING AND DEVELOPMENT ACT REGARDING SOCIAL HOUSING

- 8.1. The applicant has entered into initial discussions with the Housing department of Fingal County Council in respect to Part V. The applicant agrees to accept a condition on a grant of planning permission, if An Bord Pleanala is minded to approve the proposed development, which requires the applicant to enter into Part V agreement with Fingal County Council as per their requirements prior to the commencement of development.
- 8.2. The proposal will be to provide 70 no. of the residential units which equates to 20% of the total 345 units proposed distributed throughout the scheme to be agreed with the local authority as shall be agreed with Fingal County Council. Please see Application Form attachments for Part V layout and costings.

9.0 CONCLUSION

- 9.1. The statement set out herein demonstrates that the proposed development is consistent with the relevant national, regional and local planning policy context and section 29 guidelines. At a national and regional level, this statement has demonstrated consistency with the following:
- National Planning Framework (NPF) 2018;
 - Housing for All - A new Housing Plan for Ireland;
 - Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities 2020;
 - Urban Development and Building Height Guidelines (2018);
 - Regional Spatial and Economic Strategies – Eastern and Midland Regional Assembly (2019-2031);
 - Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual – A Best Practice Guide;
 - Design Manual for Urban Roads and Streets (2013);
 - Guidelines for Planning Authorities on Childcare Facilities (2001);
 - Transport Strategy for the Greater Dublin Area 2016 - 2035
 - BusConnects – Transforming City Bus Services (2018);
 - The Planning System and Flood Risk Management (2009);
 - Quality Housing for Sustainable Communities (2007);
 - Birds and Habitats Directive – Appropriate Assessment.
 - The Fingal County Development Plan 2017-2023
- 9.2. Consistency is also demonstrated with the policies and provisions of the Fingal County Development Plan 2017-2023, save the material contraventions identified in relation to the quantum of open space, play areas/equipment and car parking. In respect of those limited material contraventions, justification for the grant of permission notwithstanding same is included in the accompanying Material Contravention Statement.
- 9.3. Skerries is specifically identified as a 'Core Area' in the Settlement Strategy for the County Development Plan 2017-2023. The delivery of an appropriate scale of residential development at this location is therefore entirely in accordance with the confirmed policy approach to the development for this area.
- 9.4. The subject site represents one of the last remaining opportunities to develop underutilised lands within the development boundary of Skerries which are zoned for residential use.
- 9.5. The proposed development has the potential to provide significant improvements to the connectivity and permeability of the subject site with the surrounding area.
- 9.6. In conclusion, it is respectfully considered that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines except where material contraventions have been identified and a justification set out in accompanying Statement of Material Contravention and that the proposal as presented constitutes a reasonable basis for an application.




John Spain Associates

APPENDIX 1 - PRE-PLANNING APPLICATION DISCUSSIONS

SHD s. 247 Pre Application Planning Meeting

Hacketstown

<h1>MINUTES</h1>		 Planning & Development Consultants Chartered Town Planners & Chartered Surveyors	
39 Fitzwilliam Place, Dublin 2. Tel: (01) 6625803 E-mail: info@johnspainassociates.com Web: www.johnspainassociates.com			
Re:	Hackettstown Pre-app with Fingal CC		
Client:	LDA		
Job No.	18242		
Meeting No.	2	Date/Time	6/7/2020 @ 11am
Location	Teams	No. of Pages	3
Present	David Murray, Planning FCC (DM) Sean Flahive, Planning FCC (SF) Ian Campbell, Planning FCC (IC) Mark Finnegan, Parks FCC (MF) Niamh O'Connor, Transportation FCC (NOC) Philip Grobler, Water Services FCC (PG) Dwayne McAleer, LDA (DMA) Tristan McGarr, SMP (TMG) Derbhile McDonagh, OMP (DMD) Kristopher Ó Ceallaigh, OMP KOC) Bernard Seymour, BSLA (BS) Kate Wesolowska, BSLA (KW) Thomas Jennings, DBFL (TJ) Ben Mong, DBFL (BM) Stephen Blair, JSA (SB)		
	Main points discussed were: <ul style="list-style-type: none"> - Overall design approach - Open Space Hierarchy - Housing Typologies - SUD's strategy - Transportation issues including car & bicycle parking and permeability through site. 		

MINUTES



39 Fitzwilliam Place, Dublin 2.

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Re:	Hackettstown, Skerries 30.01.2020		
Client:	LDA		
Job No.	18242		
Meeting No.	2	Date/Time	30.01.2020
Location:	FCC, Swords	No. of Pages	2
Present:	<p>Peter Bryne, FCC (PB) Deirdre Fallon, FCC (DF) Sean Flahive, FCC (SF) Linda Lally, FCC (LL) Jennifer Johnson, FCC (JJ) Philip Grommel, FCC (PG) Chris Gorget , FCC (CG)</p> <p>Dwayne MacAleer, LDA (DMcA) Ben Mong, DBFL, (BM) Thomas Jennings, DBFL Derbhile McDonagh, OMP, DMcD) Bernard Seymour, BSLA, (BS) John O' Connor, JFOC, (JOC) Dominc Stevens, JFOC (DS) Keiran Noonan, Noonan Construction (KN) Mary MacMahon, JSA (MMcM) Stephen Blair, JSA (SB)</p>		
	<p>Main points discussed were:</p> <ul style="list-style-type: none"> - Cooperation and integration between lands north & south of stream - LAP Structuring Principles - Joint drainage strategy - Public, communal & private open spaces - EIAR 		