

# Planning Statement

Social Housing Bundle 5, Development at Ballymun, Dublin 11  
Dublin City Council

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# 1. INTRODUCTION

## 1.1 Background

This planning report was prepared by MacCabe Durney Barnes on behalf of Dublin City Council, to accompany a Part 8 proposal of 288 no. units on a site of c. 2.6 ha (c. 2.2 ha net) bound by Balbutcher Lane to the north, Balcurris Park to the west, the Ballymun Road to the east, and Balcurris Gardens to the south-west, Ballymun, Dublin 11.

Part XI of the Planning and Development Act 2000 as amended and the procedures set out in Part 8 of the Planning and Development Regulations 2001 as amended, relate to development by, on behalf of, or in partnership with the Local Authority. Under Section 178 of the Planning and Development Act 2000, as amended, a Local Authority is entitled to carry out its own development, provided it does not materially contravene the Development Plan.

## 1.2 Background to the Part 8 Application

The Social Housing Public Private Partnership (PPP) programme consists of the design, construction, financing and maintenance of approximately 1000 homes as part of Social Housing Bundle (SHB) 4 and 5 project bundles of social housing developments on sites around Ireland to be delivered by PPP. The Department of Housing, Local Government and Heritage is the approving authority for the programme with the NDFA as financial advisor, procuring authority and project manager.

The current bundle no. 4 &5 includes ten sites in the Dublin City Council area. The PPP model of delivery has been selected as an appropriate means of securing the delivery of social housing. Each site includes a mixture of housing typology (for example apartment, duplex, house) and site development works.

The Ballymun site includes apartment and houses. The development will be tenanted from Dublin City Council's Housing Lists, in accordance with the scheme of allocations. The proposed development has been designed by the National Development Finance Agency (NDFA) in consultation with Dublin City Council.

## 1.3 Structure of the Planning Report

This planning statement was prepared to accompany a part 8 application for the development of 288 residential units and community space at a site c. 2.6 ha located at a site bound by Balbutcher Lane to the north, Balcurris Park to the west, the Ballymun Road to the east, and Balcurris Gardens to the south-west, Ballymun, Dublin 11

The report is structured as follows:

- It provides a description of the site and surrounding area, and of the proposed development.
- It outlines how the development complies with:
  - National policy
  - Regional policy; and
  - Local policy.

## Planning Statement

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- It gives an overview of environmental matters, including ecology, environmental impact assessment and appropriate assessment.



## 2. SITE LOCATION AND CONTEXT

### 2.1 Site Location

Ballymun is located c. 5km north of Dublin City on the border between Dublin City and Fingal County Council. The site is located immediately east of Balcurris Park, south of Balbutcher lane and west of the Ballymun Road. It is located west and south of the Linnbhla residential complex and north and east of the Balcurris Garden residential estate. The Balcurris Road traverses the site from the west to the south.

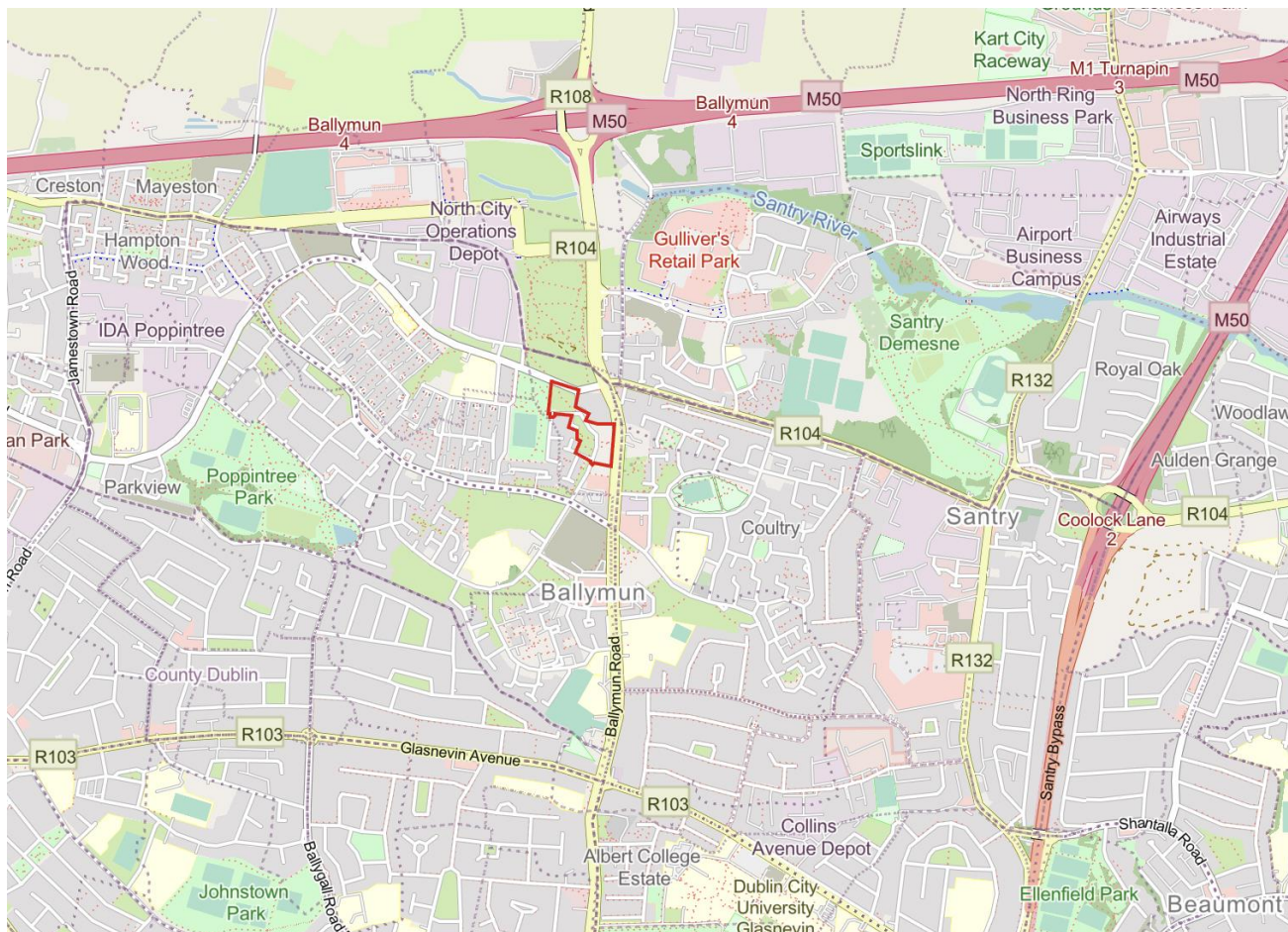


Figure 1: General Location of the Site (Source: Google Earth)

### 2.2 Site Description

The site, which consists of five individual sites, is irregular in shape. It is bound to the north by Balbutcher Lane. A bus stops is located at the site boundary to the north and to the east. Balbutcher Lane links St Margaret's Road, where large floorplate retail units such as Ikea and Decathlon are located, to Santry Avenue. The site is a c.2.6 ha brownfield site. It used to be the location of two of the old Ballymun flats blocks, which were since demolished as part the regeneration of Ballymun. The blocks were 8-storey high over basement.

The Linnbhla apartment complex is located to the north and east of the site. The overall complex is designed with a podium with lower ground (street level) and upper ground (podium level) floors. Heights across the site generally decreases from the Ballymun Road (five storeys) to Balcurris Park (3 storeys). The complex is comprised of five blocks and is split by an area of car parking which serves retail units located at ground floor. The western



block is three-storey high and faces west toward the site. The two eastern blocks are four and five storey high respectively. These include other uses at lower ground floor such as community and office type uses. The offices of the Dublin Northwest Partnership are located at lower ground floor and face the application site. This complex is located slightly lower than the part 8 site.

The Balcurris Road is a local road which links the Balcurris Gardens estate to the junction of the Silloge Road and Balbutcher Lane further south.

To the south of the site is the Lidl supermarket with associated surface car parking.

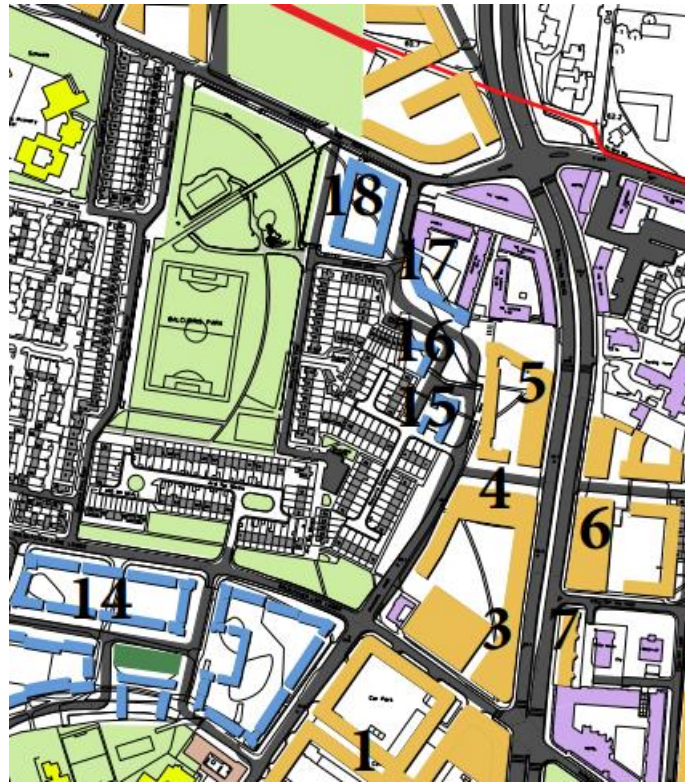
Balcurris Gardens, which is located generally south and west of the site is characterised by two-storey high terraced houses. Balcurris Close joins the Balcurris Road and terminates as a cul-de-sac at the boundary of the site. No. 14 Balcurris Close flanks the site. Its boundary along the part 8 site is a c.1.8m brick wall. No 40 to 45 Balcurris Gardens face the site. Only pedestrian access is facilitated to the front of these units, their parking being within curtilage to the rear. Some of these units use informal parking spaces which are located directly on the site to its south. No. 1 to 4 Balcurris Gardens back onto the development sit, their boundary consisting principally of garage type doors and gates.

Balcurris Park, located west of the site, is a public park, which includes a tarmacked sport pitch, a grass sport field and a walkway along Balcurris Park West. At the boundary with the site, the park includes amphitheatre style seating. To the north of the site, across the Balbutcher lane is undeveloped greenfield lands.



Figure 2: Part 8 application site

Initially, these sites were individual development sites. In further sections of this report, particularly planning policy, these are named as they are singled out in the Ballymun Local Area Plan (LAP). In the interest of clarity, the figure below represents the individual sites and the number they were allocated in the LAP.



*Figure 3: Extract from the Ballymun LAP showing sites 15,16, 17,18 (source: DCC)*

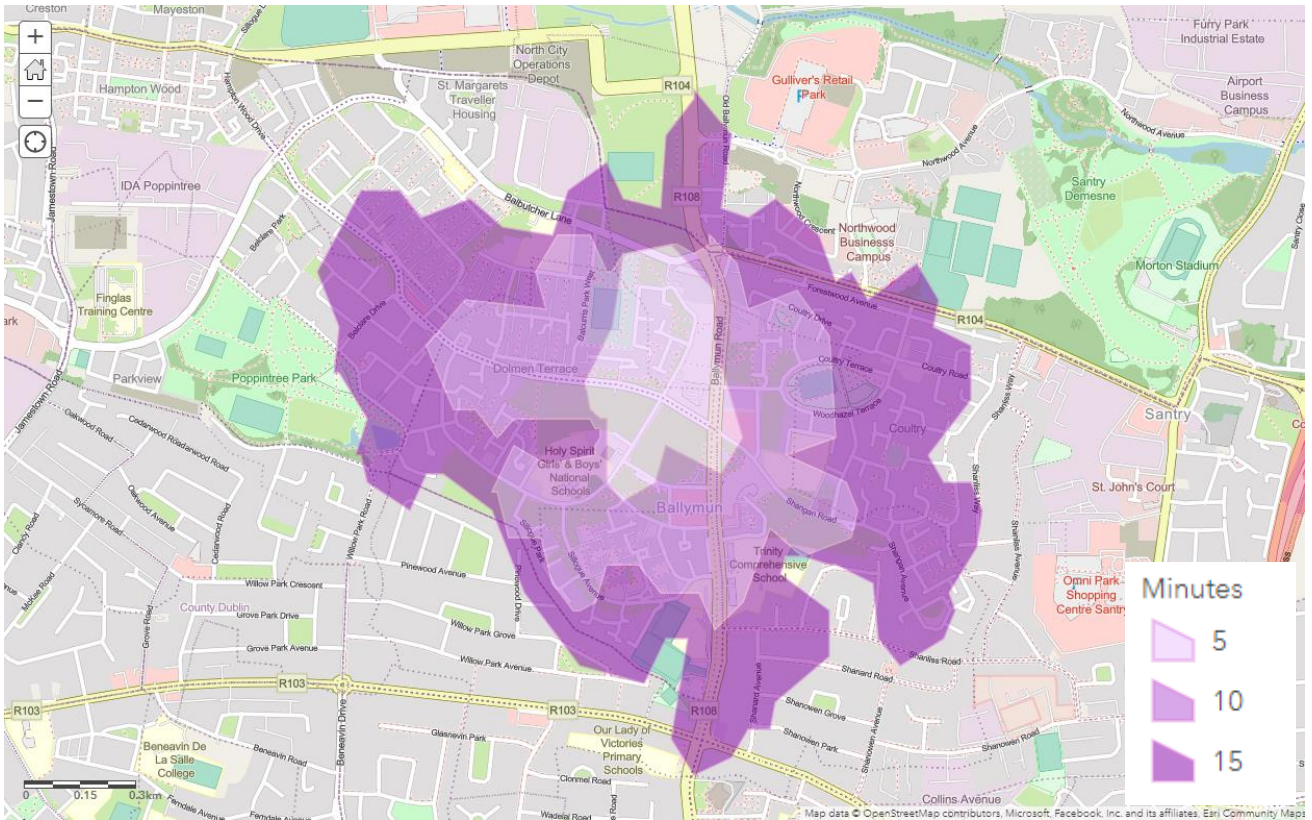
## 2.3 Transportation

The site is located c. 6.5km from the City Centre. The site is served by Bus stop no. 126 and Bus Stop no. 127 along Main Street with Dublin Bus and Goahead Ireland Bus routes serving these stops. Dublin Bus no. 40 and 155 routes can be accessed at these sites. Bus no. 4 serves travel between Harristown towards Monkstown Avenue. While bus route no. 155 provides services between Ikea Ballymun towards Bray Rail Station. Goahead bus service no. N6 route operates services between Finglas and Kilbarrack. In addition to the current routes servicing the subject site, a number of improved services are earmarked for delivery that are relevant to consider in the context of the proposed development.

### 2.3.1 Accessibility

A key priority of the Development Plan is to create sustainable neighbourhoods, with a range of household types and tenures located in close proximity to community facilities and services in order to deliver sustainable patterns of development in line with the principles of the 15-minute city. The below map illustrates the walkability of the site to surrounding neighbourhood centres, services and amenities, which will be expanded upon in this report.





**Figure 4: Walkability Patterns in 5,10 and 15 minute intervals (Source: ArcGIS)**

### 2.3.2 BusConnects

The aim of Bus Connects is to enhance bus infrastructure by improving speed, efficiency and reliability along the 16 corridors, while providing enhanced walking and cycling facilities through the provision of dedicate cycle lanes that are separated from traffic as much as possible. The overall objective of the Bus Connects project is to support the development of a sustainable and integrated public transport system in the Dublin Region that enables the delivery of compact urban growth that is sustainable and supports a low carbon future.

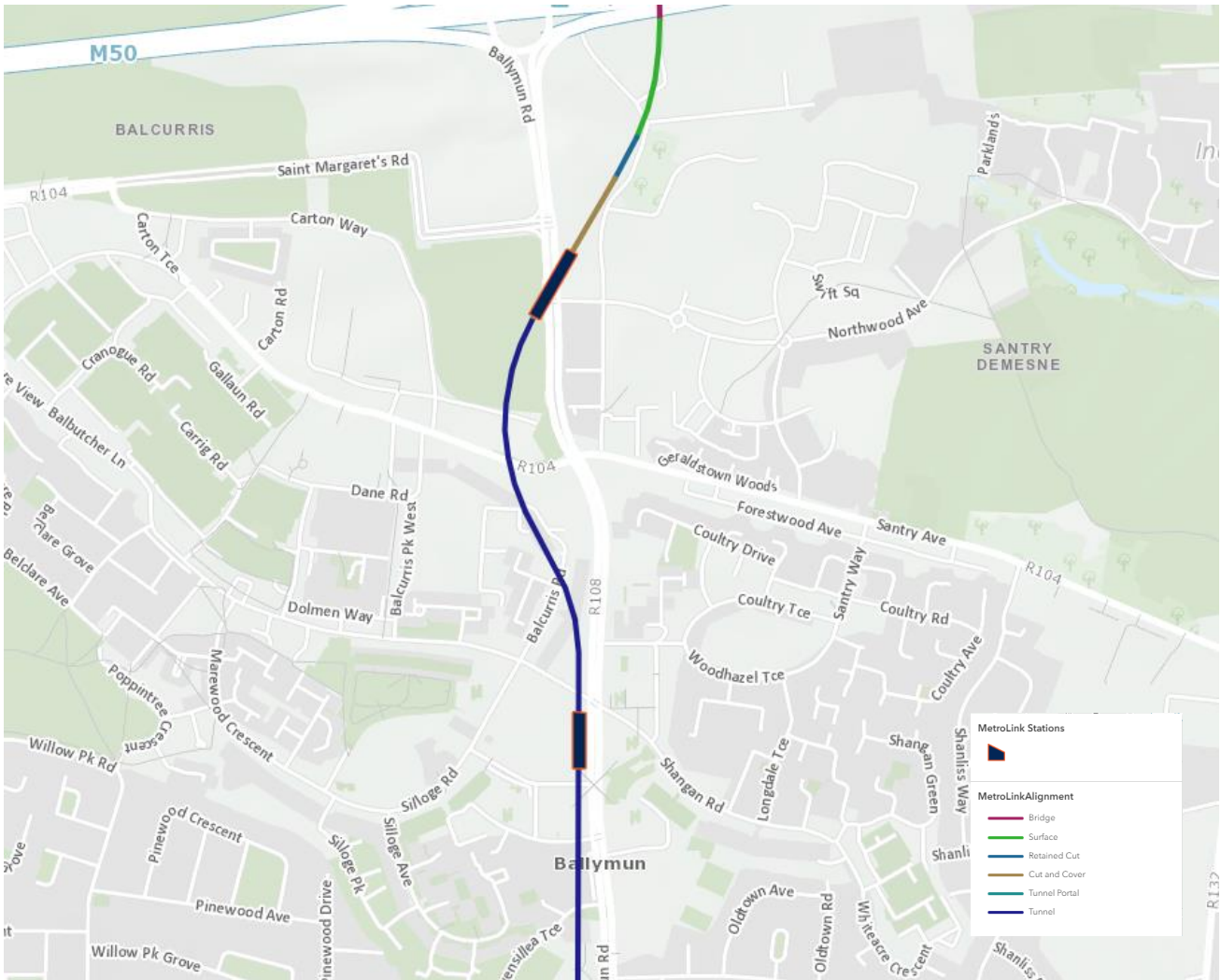
The site is located along the E-Spine serving Ballymun –City Centre – Foxrock Church. In addition to the E spine, a radial route no. 19 between the airport-balbutcher Lane—Wadelai-Parnell Street is proposed along Main Street.



Figure 5: Finglas Area BusConnects Map (Source: NTA, 2022)

### 2.3.3 Metro Link

MetroLink is a transformative piece of new public transport infrastructure, the first of its kind in Ireland. It will comprise a high-capacity, high-frequency, modern and efficient metro railway, with 16 new stations running from Swords to Charlemont. When operations commence there will be trains every three minutes during peak periods. This can rise to a service every 90/100 seconds by 2060 if required. The system will be capable of carrying up to 20,000 passengers per hour in each direction. As well as linking major transport hubs, MetroLink will connect key destinations including Ballymun, the Mater Hospital, the Rotunda Hospital, Dublin City University and Trinity College Dublin. The subject site is located above the proposed MetroLink route alignment. The site is located c. 300m from a proposed metro station at Ballymun.



**Figure 6: MetroLink Railway Order – Route Alignment (Source: TII and NTA, 2022)**

### 2.3.4 Cycling

Improved cycling facilities are proposed as part of the proposed Bus Connects Core Bus Corridor project along Main Street. The below BusConnects Road layout drawings illustrate that Main Street will be served by a dedicated cycle lane. In addition to BusConnects, Dublin City Council’s Active Travel Network Programme is set to expand the existing network from 10km to 310km across the city. The proposed programme illustrated below demonstrates that the development site will be located in close proximity to high quality active travel infrastructure, which will allow for greater ease of accessibility to social and community infrastructure identified in this report.





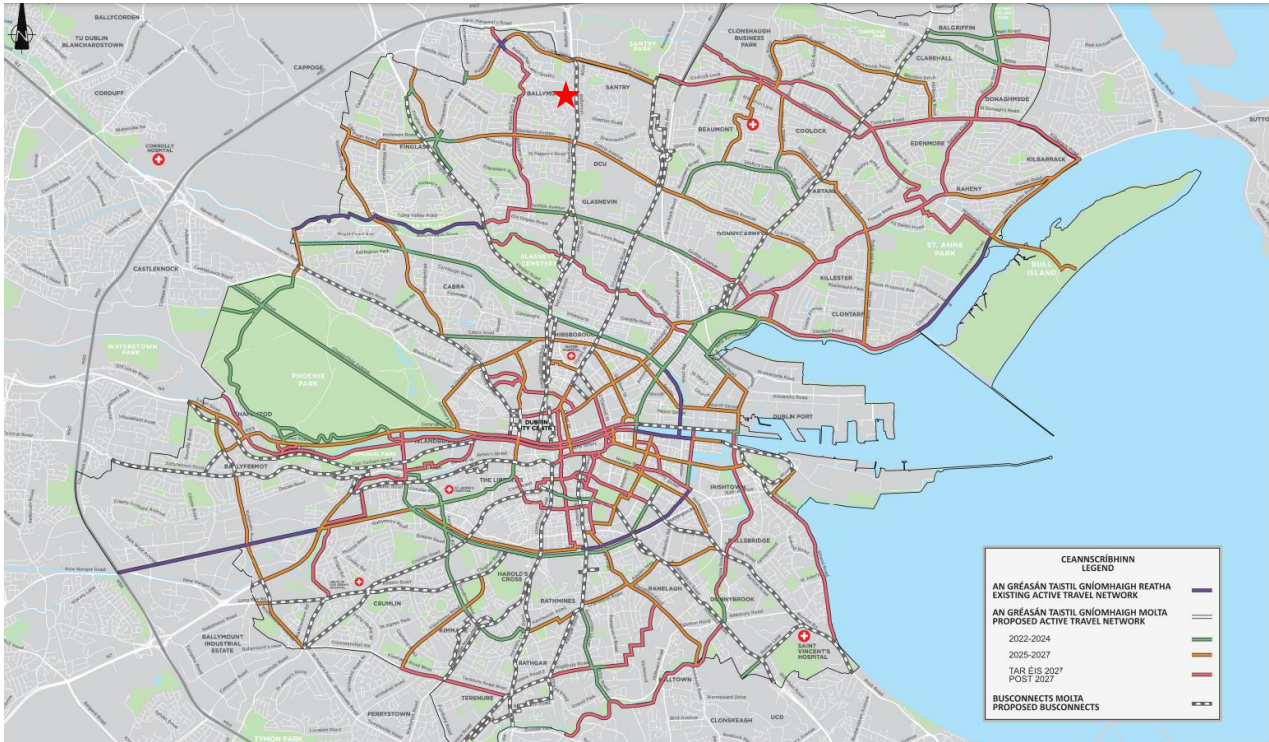


Figure 9: Proposed Active Travel Network Post 2027 (Source: DCC)

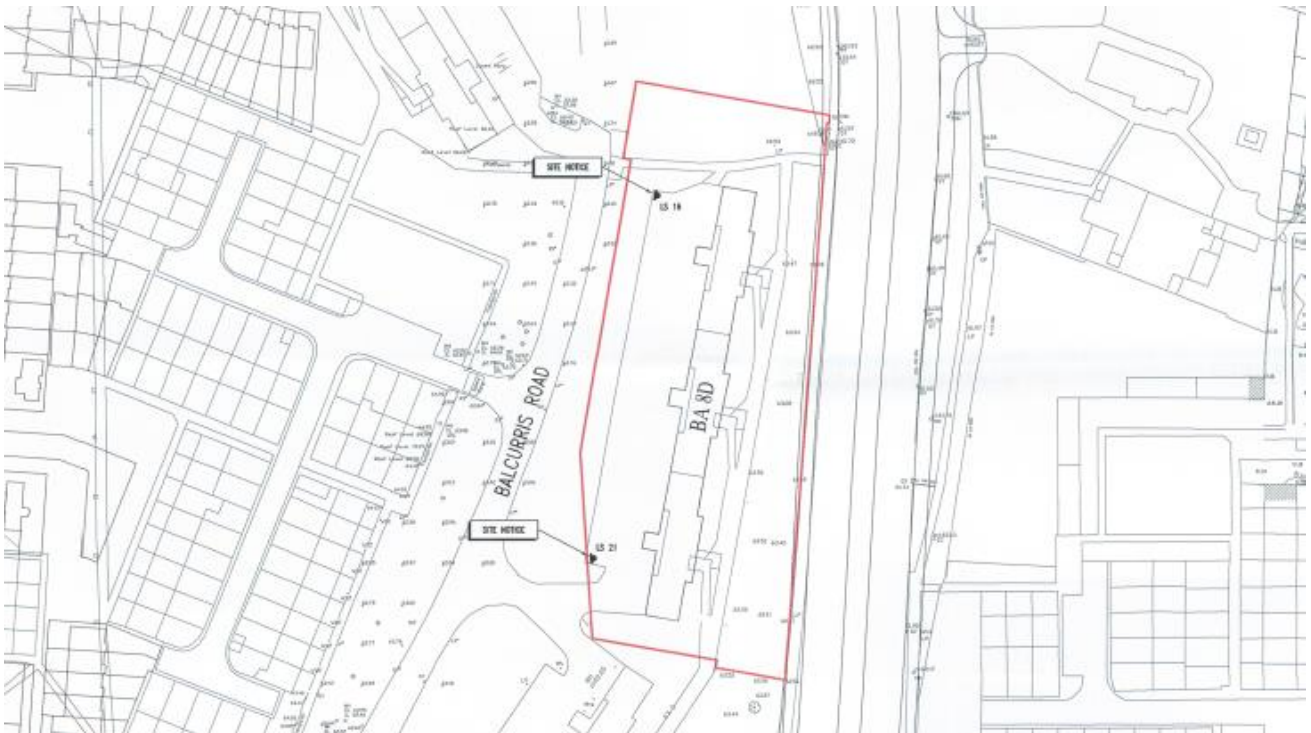


### 3. RELEVANT PLANNING HISTORY

#### 3.1 Subject Site

**PA. Reg. Ref. 0744/03:** Site (1.016 hectare) with frontage onto the western side of the realigned Ballymun Road and the southern side of the realigned Balbutcher Lane North. Construction of 217 no. apartments comprising 18 no. 1 bed, 190 no. 2 bed and 9 no. 3 bed. The proposed scheme is comprised of 5 residential blocks; Block A (located at the intersection of Balbutcher Lane North & Ballymun Road) six storey with retail/showroom use at ground floor and a common roof garden at sixth floor level; Block B1 (located along realigned Ballymun Rd) five storey with retail/office use at ground floor on the Ballymun Road frontage; Block B2 (located on the proposed St. Pappins Sq. & pedestrian street) part five story and part four storey with retail at ground floor on its frontage to the proposed St. Pappins Square and a common roof garden above its four storey element; Block B3 (located to the west of the proposed pedestrian Street) five storey; Block B4 (located to the south of the proposed surface parking) four storey. The permission was implemented and is referenced to in other parts of this report as the Linnbhla complex.

**PA. Reg. Ref. 5075/05:** Demolition by mechanical means or the controlled use of explosives, of 97-192 Balcurriss Road, Ballymun, Dublin 11. The existing development consists of one eight storey over basement flat block containing 96 flats (48 no. 3 bed, 24 no 2 bed and 24 no. one bed). Planning permission was granted in February 2006 and has been implemented.



**Figure 10: Site Location Map (Source: Muir Associates as displayed on DCC's Planning Register)**

**PA. Reg. Ref. 2887/07:** The works will consist of the demolition of nos 193 - 288 Balcurriss Road by mechanical means or by controlled use of explosives. Nos 193-288 consists of an eight-storey over basement flat block containing 96 no. flats (24 no. 3 bed, 48 no. 2 bed and 24 no. 1 bed). Planning permission was granted in June 2007 and has been implemented.

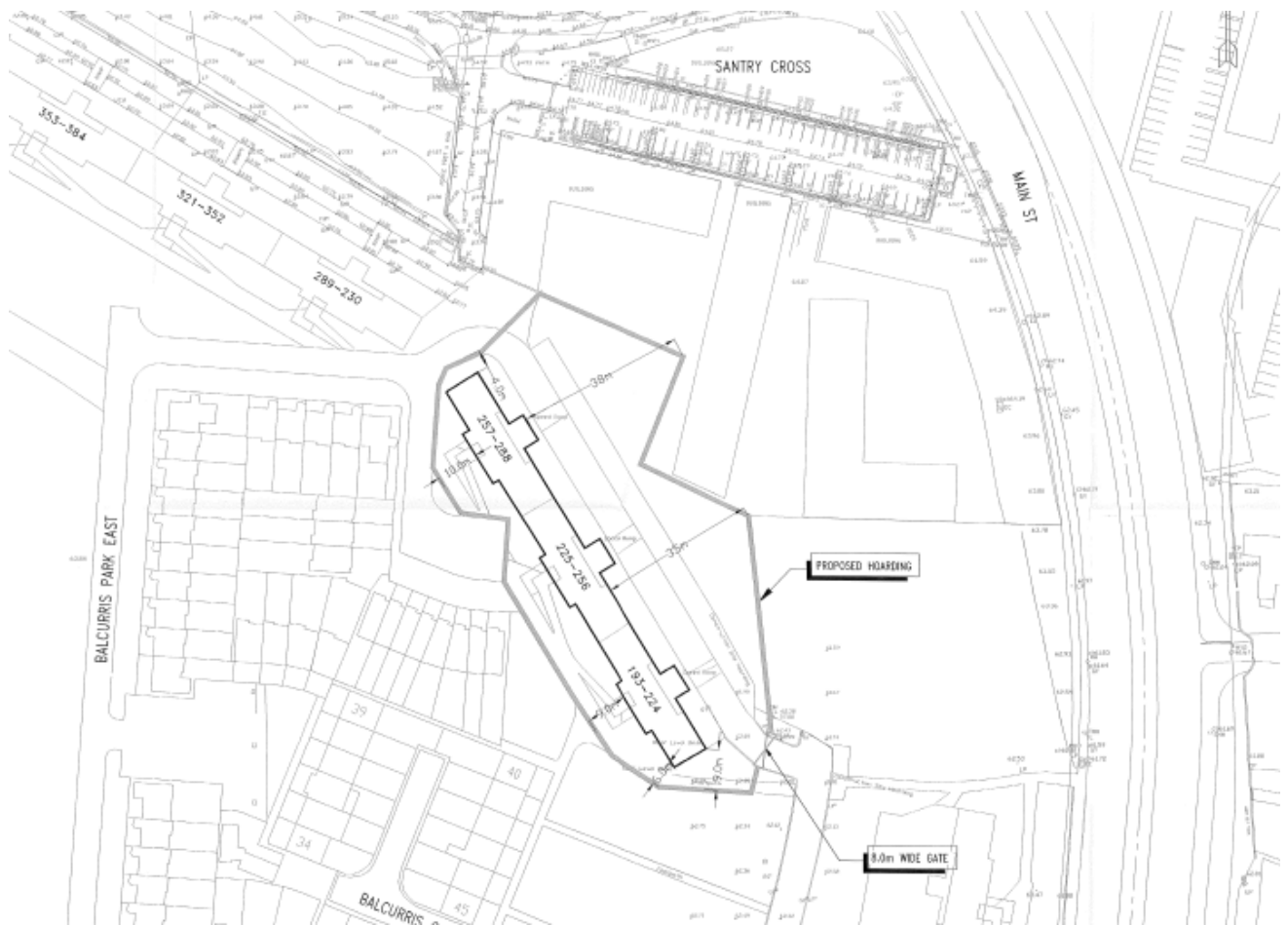


Figure 11: Site Layout Plan (source: Muir Associates as displayed on DCC Planning Register)

**PA.Reg.Ref.3234/09:** Development comprising of accommodation for the Ballymun Residential Project (381sqm) and 43 no residential units. Planning permission was granted on appeal in January 2010 to Ballymun Regeneration Ltd. The permission was not implemented and has now lapsed.



Figure 12: Site location of PA.3234/09 (Source: Newenham Mulligan & Associates as displayed on DCC's Planning Register)

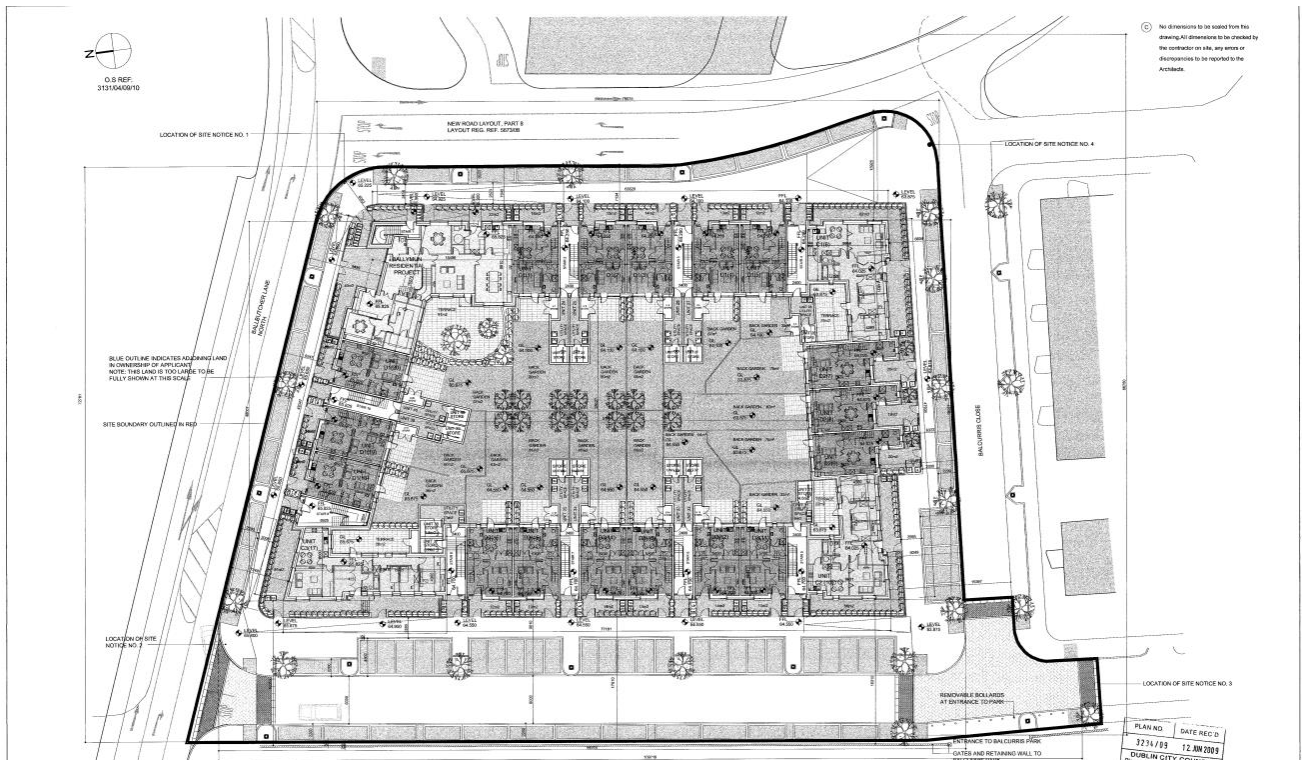


Figure 13: Site Layout of PA.3234/09 (Source: Newenham Mulligan & Associates as displayed on DCC's Planning Register)

**PA.Reg.Ref.5376/08:** Part 8 for works to the road network, specifically to seven related road sections:

- Balbutcher Lane north



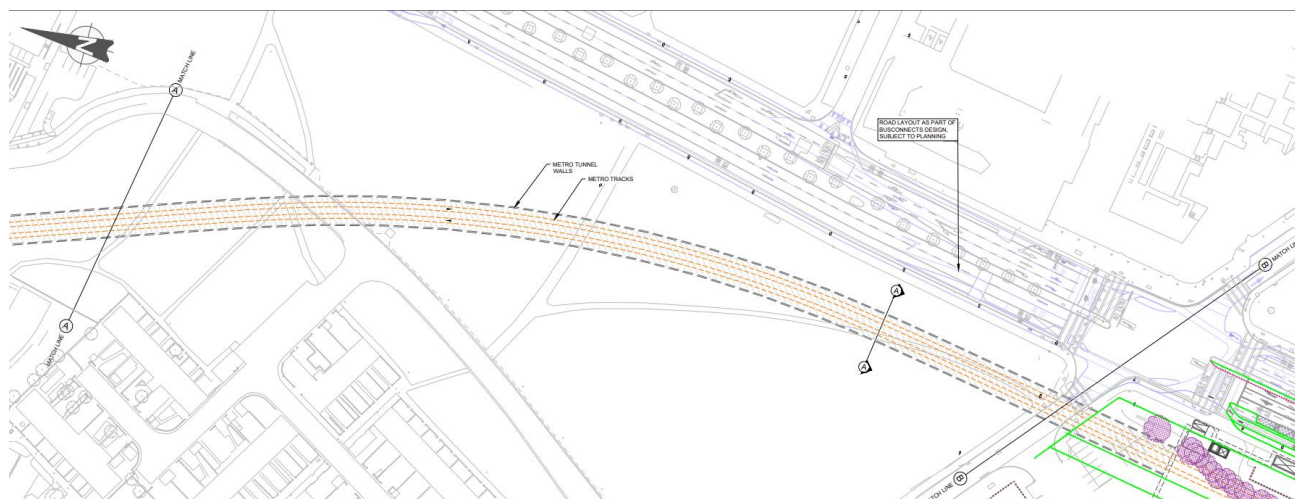
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- Balcurris Road
- Balcurris Road / Main Street Link Road
- Balbutcher Lane South
- Silloge Road
- Gateway Crescent

**ABP Ref. 314724:** MetroLink Rail Order Application to An Bord Pleanála. The alignment of the tunnel passes below the site.



**Figure 14: General Arrangement showing alignment of the MetroLink tunnel below the site (Source Jacobs & IDOMS as displayed on An Bord Pleanála's website)**



**Figure 15: General Arrangement showing alignment of the MetroLink tunnel below the site (Source Jacobs & IDOMS as displayed on An Bord Pleanála's website)**

**ABP Ref. 314610:** BusConnect Ballymun/Finglas to City Centre Core Bus Corridor Scheme was granted permission by An Bord Pleanála on 12th March 2024. The development consists of a sustainable transport scheme which provides for both cycle and bus priority measures over a distance of 11km and will be comprised of two main alignments, from Ballymun to the City Centre (the Ballymun Section) and from Finglas to Phibsborough (the Finglas Section). Bus Connect would be located along the Ballymun Road, directly adjacent to the site to the east.

### 3.2 Surrounding Area

**Ballymun Plaza Part 8:** During the summer of 2021, the Parks, Biodiversity and Landscape Department of Dublin City Council launched the public consultation associated with the improvement of the public realm within Ballymun Plaza / Cearnóg an tSeachtar Laoch. This is located just under 300m west of the application site. The development consists primarily of landscape enhancements to allow the Plaza to function as focal point for Ballymun. The part 8 was approved in October 2021.

**Part 8 at Shangan Road:** Construction of 93 residential units to include 73 older persons apartments, 4 no. duplex apartments and 16 no. houses (6. No. 2-bed, 8 no. 3-bed and 2 no. 4-bed). The proposed development includes public open space in accordance with the zoning requirement. The part 8 was approved in August 2022.

**PA.Reg.Ref.3892/24:** Part 8 at Balbutcher Lands bound to the north by Balbutcher Lane and to the south by Sandyhill Gardens and Holy Spirit National School. The development is for the construction of 138 no. dwellings (all houses) and 0.257 ha of public open space.

## 4. SITE SELECTION AND CONSIDERATION OF ALTERNATIVES

### 4.1 Site Selection

The subject land is in the ownership of Dublin City Council and therefore can be efficiently utilised to meet some of the demand for social housing arising in Dublin City and particularly Ballymun. Ballymun has undergone significant regeneration in the last 15-20 years with the demolition of the Ballymun flats by Ballymun Regeneration Ltd. As the agency was wound up, some landbanks had been cleared but not been redeveloped to date. These were transferred to Dublin City Council. Site selection was restricted to consideration of that land in the ownership of Dublin City Council and which could be adequately serviced and integrated to provide much needed social housing.

Site selection has taken a plan-led approach to development having regard to the zoning provisions in the Dublin City Development Plan 2022-2028 (CDP) and having considered the provisions of the Ballymun LAP 2017 as extended. The CDP has zoned parts of the site as Z1 'Sustainable Residential Neighbourhoods' and parts as Z4 'Key Urban Village'. There are no impediments to proceeding with the site.

The site is located within an established residential neighbourhood, in close proximity to shops and community facilities and high frequency buses. It is ideally located to meet the principles of the 15-min City as envisaged in the Dublin City Development Plan (CDP) 2022-2028.

### 4.2 Consideration of Housing Tenure and Types

The provision of social housing on the site will facilitate diversity in tenure and facilitate housing mix in the outer northwestern suburbs of the city.

In the surrounding area, which consists of the Ballymun A to F Electoral Divisions (EDs) and the Dubber and Airport EDs, more than half of the housing stock consists of houses. The proposed development mostly consists of apartment units which allows to achieve higher density in an area with high quality public transport and which is planned to be served by MetroLink.

Across the development site, 47.9% of the units are one-bed. The existing stock includes 7.9% of one-bed units, compared to 35% two-bed unit. The site is located in area D of the DCC social housing waiting list. Demand for one-bed units in this area is by far the strongest with 823 out of the 1,811 households requiring a one-bed units. In this regard, the development, which includes 138 one-bed units, will make positive contributions to alleviate housing need.

The provision of social housing on this site will facilitate diversity in tenure and facilitate housing mix in the area in accordance with Policy Objective QHSN35 of the Development Plan. This policy requires the provision of a greater diversity of housing types and tenures, including social and affordable housing. A number of sites identified in the Ballymun Local Area Plan are currently being progressed to planning and development stage. Overall, these sites will provide for mixed tenures across Ballymun including social and affordable housing. The Social Housing Need and Justification Report identifies the different sites and the planned tenures. It demonstrates how the site will make positive contributions to the housing stock both with regard to the proposed mix and tenure. On this basis, the proposed development must be considered appropriate to the area, providing for balanced and integrated housing tenure in this part of Dublin City.

### 4.3 Consultation

Public consultation took place in relation to the proposed development on the 20<sup>th</sup> February 2024 between 4 and 7 pm in the Ballymun Civic Centre. The DCC Housing Department, Local Area Office and Project Architects were in attendance.

## 5. CONSIDERATION OF DESIGN

Much consideration has been given to the layout and design of the scheme with a particular focus on providing a high-quality residential development, creating a sense of place for future residents whilst integrating into the existing built environment. The site has two frontages and is particularly important for strengthening the built fabric. The site is in a prominent location when traveling south on the Ballymun Road. Although there are a number of signalled junctions between the M50 and the site, there is disparate and unconsolidated fabric on the western side of the Ballymun Road which can entice to speeding, when combined with the long straight linear nature of the road. It was therefore necessary to clearly mark the entrance to Ballymun and provide continuous built fabric. This will also allow to provide for natural surveillance on the section of the Balbutcher Lane which runs from its junction with the Ballymun Road to Balcurris Park West, which is bound on both sides by park lands and undeveloped sites.

The site is also bound to the west by low rise terraced housing and therefore had to be cognisant of their residential amenities.

The proposed design is broadly aligned with the principles set out under the Ballymun LAP 2017 and replicated the development principles outlined in the site briefs.

The client brief had envisaged that 126 units could be accommodated, whereas the Ballymun LAP had envisaged that 177 to 230 units could be accommodated. At part 8 stage, 288 units can be accommodated without impacting on the surrounding residential units at Linnbhla and Balcurris. The proposed density (130.1 uph net) makes the most efficient use of zoned, urban land whilst also seeking to integrate with and consolidate existing and planned development in the area.



## 6. PROPOSED DEVELOPMENT

### 6.1 Project Description as per Public Notices

Notice is hereby given of the construction of 288 apartment/duplex and housing units at a site of c. 2.6 ha (c. 2.2 ha net) bound by Balbutcher Lane to the north, Balcurris Park to the west, the Ballymun Road to the east, and Balcurris Gardens to the south-west, Ballymun, Dublin 11, which will consist of the following

- Construction of 288 no. apartment/duplex and housing units across 5 sites (Sites 5, 15, 16, 17 and 18) ranging from 2 to 6 storeys containing 138 no one-bed, 87 no. 2-bed units, 61 no. 3-bed and 2 no. 4-bed dwellings.
  - Site 5 consists of 132 no. apartment units (66 no. 1 bed, 44 no. 2 bed units and 22 no. 3 bed units) and ranges from 4 to 5 storeys including a new urban edge along Ballymun Road;
  - Site 15 consists of 8 no. dwellings comprising 6 no. 1 bed own-door apartments and 2 no. 3 bed houses adjoining Balcurris Gardens
  - Site 16 consists of 5 no. dwellings comprising 2 no. 1 bed own-door apartments, 1 no. 3 bed house and 2 no. 4 bed houses adjoining Balcurris Gardens
  - Site 17 consists of 34 no. apartment units (17 no. 1 bed units, 9 no. 2 bed units and 8 no. 3 bed units) and ranges from 3 to 6 storeys forming an urban block with incomplete urban cell at the Linnbhla and Charter apartments;
  - Site 18 consists of 109 no. apartments (47 no. 1 bed units, 34 no. 2 bed units and 28 no. 3 bed units) and ranges from 4 to 5 storeys with edges to Balcurris Road, Balcurris Park and a new edge to Balbutcher Lane;
- 70 no. car parking spaces, 4 no. loading bays and 4 no. motorbike parking spaces
- 551 no. long stay and 180 no. short stay bicycle parking spaces to serve the housing units.
- Provision of 1611 m<sup>2</sup> Retail/Commercial floor space at ground level facing Ballymun Road/St. Pappins Square (sites 5 and 17)
- Provision of a 324 m<sup>2</sup> childcare facility at ground floor in Site 5.
- Provision of 1,058 m<sup>2</sup> of community, cultural and arts space located at ground floor level in sites 5 and 17.
- Provision of 91 no bicycle spaces to serve the non-residential uses distributed across the site.
- The provision of a public open space in a new plaza at St Pappin's Square (1,953 m<sup>2</sup>) and additional areas of 979m<sup>2</sup>, 496m<sup>2</sup> and 839 m<sup>2</sup> with 2,969 m<sup>2</sup> of communal open space
- Realignment of Balcurris Road, provision of two new vehicular accesses (one off the Balbutcher Lane and one off the Ballymun Road) and a dedicated pedestrian and cycle lane off the Balbutcher Lane
- Boundary treatments, public lighting, site drainage works, internal road surfacing and footpaths, ESB meter rooms, ESB substations, stores, bin and cycle storage, plant rooms, landscaping; and
- All ancillary site services and development works above and below ground.



**Figure 16: proposed site layout (Source: MCORM Architects)**

In summary, the proposed development has been designed to provide high quality homes for a range of households from the 1-bed to the 4-bed. The design is cognisant of the existing uses in the vicinity and has applied the principles and objectives of the Ballymun LAP. It will provide a net density of 131.1 uph, which is acceptable considering the site location close to two planned high frequency and capacity public transport networks.

## 6.2 Detailed Description

A detailed description of the proposed development is outlined in this section.

**Table 1: Proposed Details**

Development Parameters	Summary
Parameter site proposal	2.67 ha gross 2.19 ha net
No. of residential units	273 no. apartments; 10 no. own-door apartments; 5 no. houses

Non-residential uses	1,611.1 sqm retail/commercial space 1,058 sqm community space (including 268 sqm outdoor) 324 sqm childcare facility
Density	Gross: 107.7 uph Net: 131.1 uph
Plot ratio	0.925
Site coverage	34.02%
Dual aspect	58.33%
Car parking overall	70 no car parking spaces and 5 no. loading bays
Bicycle parking	For residential use: 551 no. long stay and 180 no short stay  For other uses: 91 no spaces
Height	2 to 6 storey high
Public open space	New plaza at St Pappin's square: 1,953 sqm Additional areas: 979 sqm and 839 sqm
Communal open space	2,969 sqm of communal open space

The breakdown of the overall residential unit type is as follows:

**Table 2: Overall Breakdown of Units**

Unit Type	1 bed apt	2 bed apt	3 bed apt	1 bed own-door apt	3-bed house	4-bed house	Total
No. of units	128	87	58	10	3	2	288
% of mix (overall)	44.4	30.2	20.1	3.5	1	0.7	100
% of mix (per typo)	48.8	30.7	20.5	(included under 1 bed apartment)	60	40	n/a
Total per type (apartment /house)	283				5		288
% per type	98.3				1.7		100%

### 6.3 Design Rationale

The scale and locational characteristics of the subject site provide a unique opportunity for a sustainable, higher density residential development. The part 8 site was the home of several of the former Ballymun flat blocks. Their redevelopment has been a long-term objective of Dublin City Council and Ballymun Regeneration Ltd before then. The site currently acts as a large vacant site which physically splits off different parts Ballymun, particularly the Ballymun Road from the residential estates located to its west, specifically Balcurris Gardens, therefore isolated the different neighbourhoods, particularly from the centre of Ballymun where the retails units and community facilities are located.

The design rationale followed the site briefs as set out under the Ballymun LAP. The site is located in a transitional location between the Ballymun Road, which is five-storey high on this specific frontage and the Balcurris Gardens, which comprises two-storey dwellings. It was therefore necessary to provide heights that would complement those along the Ballymun Road but also allow for a suitable transition toward Balcurris Gardens. The units to be located to the western edge fronting Balcurris Gardens will be two-storey high.

The site has a site significant frontage on the Ballymun Road. Development of that frontage has to achieve several objectives. It has to provide a cohesive frontage with active uses at ground floor to entice natural surveillance and encourage lower speed along the Ballymun Road. It also has to cater for links from the Ballymun Road toward the west to ensure pedestrian permeability to and from the public transport corridor.

A plaza is proposed adjacent to the existing pedestrian crossing across the Ballymun Road, toward St Pappins Church. This plaza will provide an alternative route toward the west of Ballymun and particularly to Balcurris Park and the facilities located around the St Joseph National School and further in Poppintree. The new plaza will be bound on two sides (west and south) by retail/commercial floorspace. Its western vista will be closed off by a six-storey building which has dual frontage on both the plaza and the Balcurris Road.

At the heart of the development site is proposed a large playground, which will be well overlooked on all sides. This playground is to be located directly across the plaza to the south. Its location, to the west and south of the Balcurris Road, will entice lower car speed along the road. At present the Balcurris Road is completely undeveloped and avails of limited to no natural surveillance. As a result of development will be fully built on both sides, giving a sense of enclosure and place to the area.

The northwestern block will have an importantly role in strengthening the built frontage on the Balbutcher Lane. There is very limited overlooking from any of the developments located to the south of the Balbutcher Lane and the northern lands are undeveloped. The new block will provide direct overlooking onto the road.

## 7. PLANNING POLICY

### 7.1 National Policy

#### 7.1.1 National Planning Framework

The National Planning Framework (NPF) guides national, regional and local planning decisions until 2040 as the high-level strategic plan for shaping the future growth and development. The National Strategic Outcomes are expressed as follows:

1. Compact Growth
2. Enhanced Regional Accessibility
3. Strengthened Rural Economies and Communities
4. Sustainable Mobility
5. A Strong Economy, supported by Enterprise, Innovation and Skills
6. High-Quality International Connectivity
7. Enhanced Amenities and Heritage
8. Transition to a Low Carbon and Climate Resilient Society
9. Sustainable Management of Water, Waste and other Environmental Resources
10. Access to Quality Childcare, Education and Health Services

The NPF states that carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work.

National Policy Objective (NPO) 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 envelope of existing urban settlements'*. The application site is located in built-up envelope of Dublin City.

National Policy Objective 3b seeks to *'Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.'* The proposed development accords with objective (3a and 3b) in the provision of new social homes within an urban context.

National Policy 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 accords with this objective and provides a high-quality homes in close in close proximity of public transport and public facilities. The proposed layout caters for communal and public open space. It includes 1,058 sqm of community, arts and cultural space which will serve both prospective and existing residents to allow for the creation a cohesive community in the development. It also includes commercial and retail floorspace, in addition to a creche. The development will complement and expand the function of the Ballymun Road which is a neighbourhood centre at the location.

National Policy Objective 33 seeks to *"Prioritise provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location"*.

Given the location of the site on the Ballymun Road, the site is served by several bus lines. The public transport offer is planned for significant enhancement with the permitted Bus Connect corridor and the planned MetroLink

projects located on the Ballymun Road. It is therefore considered that the provision of 288 units at the location is appropriate.

National Policy Objective 34 aims to *“Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time”*.

The proposed development accords with this policy and the scheme provides for homes that includes 49 no. universally designed units.

National Policy Objective 35 aims to *“Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or self-based regeneration and increased building heights.”*

The proposed development has a net density of 131.1 uph with heights ranging from 2 to 6 storeys. The proposed height is aligned with recently permitted heights in the area. The lands have been vacant since several of the Ballymun flats were demolished. Their redevelopment has been a long-term objective of Dublin City Council and Ballymun Regeneration Ltd. The proposed development is therefore considered to positively respond to the objective.

In summary, the proposed development is a city location with a wide range of amenities and transport options within easy reach. The proposed redevelopment is aligned with the policies and objectives of the NPF.

### 7.1.2 Climate Action Plan 2024

The Climate Action Plan 2020 is the roadmap to deliver on Ireland’s climate ambition. It takes account of the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed in 2022. The plan reiterates the targets set out under the Climate Action and Low Carbon Development (Amendment) Act 2021 which seeks a reduction of 51% on GHG emissions by 2030 compared to 2018 levels and to achieve climate neutrality by 2050.

In relation to the decarbonisation of housing, the plan identifies Key Performance Indicators (KPI) and abatements, the former serving as a key metric. The following themes and associated KPIs are relevant:

Theme	2025 KPI	2025 abatement (vs 2018 MtCO <sub>2</sub> eq)	2030 KPI	2030 abatement (vs 2018 MtCO <sub>2</sub> eq)	2031-2035
<b>Standards and Regulations</b>	All new dwellings designed and constructed to NZEB standard. 147,000 new dwellings using a heat pump.	0.3	All new dwellings designed and constructed to NZEB standard. 280,000 new dwellings using a heat pump.	0.4	Minimum Energy Performance for all dwellings

All units provided will be to the appropriate standards. Please refer to Climate Action Energy Statement, Sustainability & Part L Report accompanying this application.

The CAP 2024 refers to recommendations from the Climate Change Advisory Council on the need to shift away from car dependency through consideration of the proximity between people and places in land use and housing policy.

The proposed development has a parking ratio of 0.24 and is in close proximity to existing and planned transport corridors. It promotes a shift away from car dependency and the use of alternative modes including cycle and public transport.

The proposed development will help to achieve the targets set by the Climate Action Plan 2024 in the following ways:

- The provision of high residential density and in accordance with the NPF providing for compact growth.
- The proposed development provides a high-density residential development in close proximity to existing community facilities and amenities.
- The application site is within walking and cycling distance to bus and proposed Metro station and BusConnects route. The provision of additional residential and community uses in this location will support the existing public transport serving the area and will make the provision of further public transport options (such as increased frequency of services) viable.
- Bicycle parking storage has been provided.

The proposed development therefore accords with the Climate Action Plan 2024.

## 7.2 Ministerial Guidelines

A number of national planning guidelines may be considered.

- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Delivering Homes, Sustaining Communities (2004) and the accompanying Best Practice Guidelines – Quality
- Housing for Sustainable Communities (2007)
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024
- Urban Design Manual – A Best Practice Guide (2009)
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)
- Design Manual for Urban Roads and Street (2019)
- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2023)
- Urban Development and Building Heights – Guidelines for Planning Authorities (2018)
- Design Manual for Quality Housing (2022)

### 7.2.1 Guidelines for Planning Authorities on Childcare Facilities

It is noted that these are a planning guidance document only, and standards set down in relevant childcare legislation take precedence.



Section 2.4 of the Guidelines addresses appropriate locations for childcare facilities and considers that one childcare facility for every 75 units is generally appropriate. The Guidelines require the provision of childcare facilities at a ratio of 20 childcare spaces for every 75 proposed dwellings.

Having regard to the Design Standards for New Apartments, Guidelines for Planning Authorities, 2020, one bedroom apartment units should not generally be considered to contribute to a requirement for childcare provision (and subject to location this may also apply in part or in whole to two bedrooms). The provision of 288 units, 138 of which are one-bed means that the development should apply the 75- unit threshold set out by the Childcare Facilities Guidelines for Planning Authorities (2001).

A Social Infrastructure Audit was prepared by MacCabe Durney Barnes and accompanies this part 8 application. The Dublin Childcare Committee was consulted and identified 14 facilities within 1km of the site. Another four have an extant planning permission in the area. The audit considers that the development could generate an indicative childcare need for 50 children. The assessment also notes that using the 2022 Census found almost 150,000 children of pre-school age (0-4 years old) were in childcare in Dublin City. The audit also found that there were 45 spaces available in the catchment around the development site. Cumulated with the proposed creche which would accommodate spaces for 54 spaces, it is considered that the provision is acceptable and that the development would not add undue pressure in the area as in principle the development will accommodate enough spaces to meet its own demand. The proposed creche of 324 sqm will be located at the west of site 5 across from the proposed playground.

### 7.2.2 Delivering Homes, Sustaining Communities (2004) and the accompanying Best Practice Guidelines – Quality Housing for Sustainable Communities (2007)

Chapter 4 indicates that in the planning and design of the scheme, the architect should:

- Seek to create a high-quality living environment for residents and enhance the social, environmental and visual quality of the area as a whole;
- Seek to ensure a high level of safety and security for the residents through causal surveillance and overlooking; Maximise amenity and energy efficiency by climate sensitive design;
- Eliminate barriers to accessibility for all users - particularly older people and those with mobility impairment or other disability;
- Seek to ensure that the scheme can be constructed, managed and maintained at reasonable cost and in a way that is economically, socially and environmentally sustainable;
- Design public open space so as to maximize its potential benefit to the resident through clear definition of public, communal private open space;
- Permeability as the means to achieve a high-quality living environment.

A Design Statement accompanies the Part 8 documentation. The environmental and visual quality of the area as a whole will be enhanced significantly by the development of a vacant site. The site is currently underused as an informal open space. As it was not planned to act as an open space, it did not avail of significant landscaping. The area specifically earmarked for public open space will avail of high-quality landscape.

The proposed development has been designed to be cognisant of prevailing height and surrounding residential amenities. All areas of open space (public and communal) are well designed and usable. The new plaza, St Pappin's Square has been designed to be used as an outdoor gathering area.



The proposed development will change the nature and outlook of the site to be more in harmony with the surrounding area.

All units have been designed to meet the highest level of energy efficiency. The units will be constructed to the highest degree of air tightness to a possible value of 3 m<sup>3</sup>/m<sup>2</sup>/hr1. The development will use energy efficient technologies to reduce its reliance on fuel and electricity demand. 57.6 % of the apartments are dual aspect. The proposed development underwent a daylight and sunlight assessment to ensure that appropriate levels of daylight and sunlight are provided to the units. As previously stated, 49 units will meet universal design standards.

The proposed development will be delivered as part of a PPP. As outlined in the Building Lifecycle Report accompanying this Part 8, the appointed PPP company will deliver, maintain and manage the development. At planning stage *'consideration has been given to the external materials to buildings, boundaries, and the public realm, and also outline energy carbon reduction strategies. The materials and services proposed will be durable, and will provide a long life and low maintenance requirements for the residents.'*

All areas of open space, whether communal or public, have been designed to ensure their maximum use by residents.

### 7.2.3 Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)

These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities which in turn replaced the Residential Density Guidelines issued in 1999. There is a focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

Table 3.1 sets out Areas and Density Ranges in Dublin and Cork City and Suburbs. It is a policy and objective of the Guidelines that residential densities in the range:

- 100 dph to 300 dph (net) shall generally be applied in the centres of Dublin and Cork;
- 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork;
- 40 dph to 80 dph (net) shall generally be applied at suburban and urban extensions in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at accessible suburban / urban extension locations.

The subject site is located within an urban neighbourhood with access to existing and planned high-capacity public transport. The application site's context aligns with the criteria of strategic and sustainable development locations defined under the category of City – Urban Neighbourhoods, where density shall generally range between 50-250 dph.

#### **Policy and Objective 3.1**

*'It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning*

applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.'

For the purpose of calculating the net density on site excludes the Z9 zoned lands and the road network as shown in the diagram below. This equates to a net site area of 2.1973 ha and results in a net density of 131.1 uph which aligns with the recommended densities in an urban neighbourhood as set out in the Guidelines.

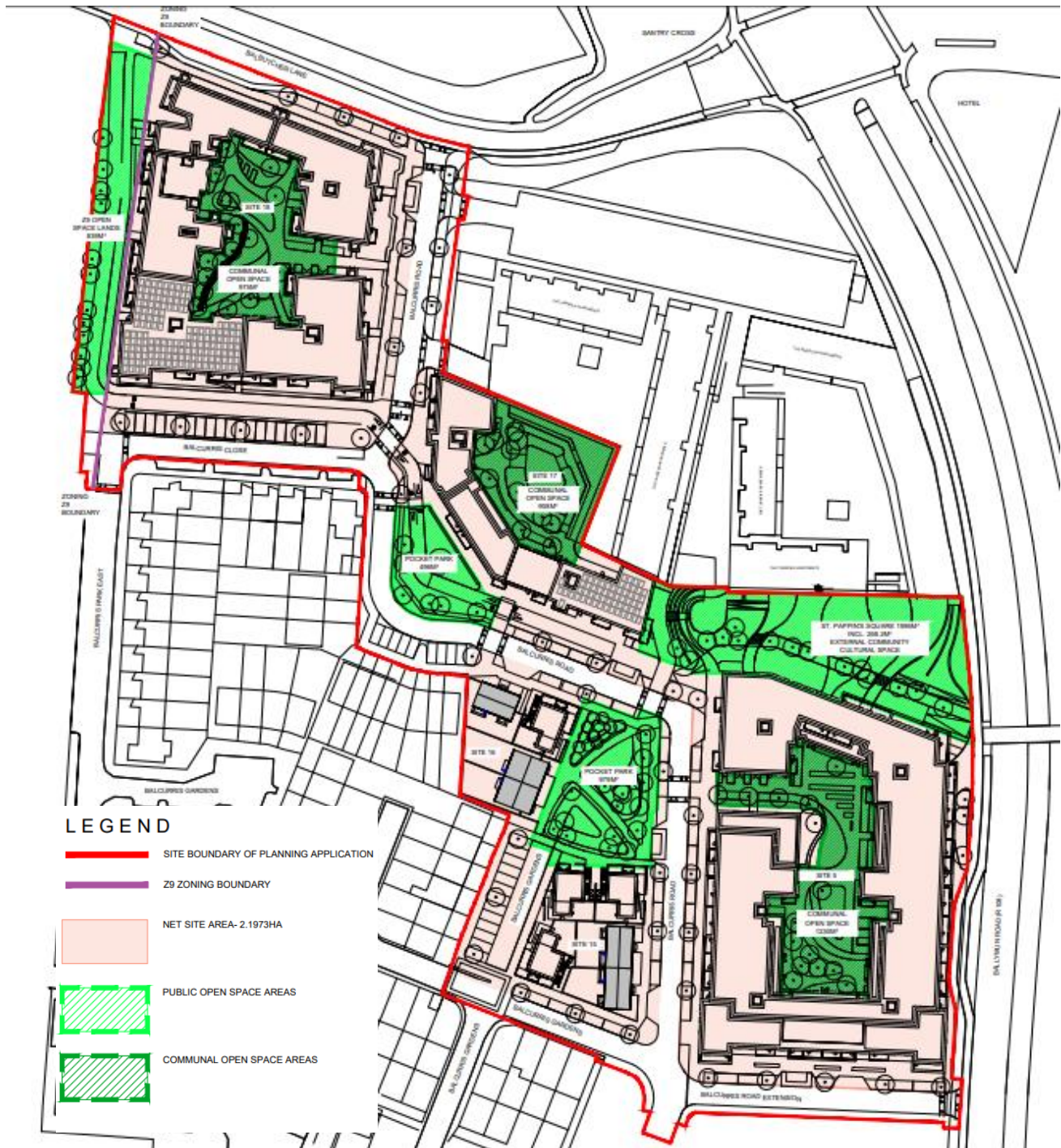


Figure 17: Net Site Area (Source: MCORM)

Policy and Objective 4.1

*It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking.*

The principles approaches and standards of DMURS have been an integral part of the design process. A Quality Audit Report has been produced by ORS, which includes a Road Safety Audit, Cycle Audit, and an Accessibility Audit. The Quality Audit assessed the proposed layouts supplied by the Design Team and made a number of recommendations in line with guidance such as DMURS.

Section 4.4 outlines general aims of sustainable residential development, including the need to prioritise walking, cycling and public transport over the use of cars, and to provide residents with quality of life in terms of amenity, safety and convenience.

**Policy and Objective 4.2**

*It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.*

Chapter 4.4 identifies the core principles of Quality Urban design and Placemaking, including Sustainable and Efficient Movement, Mix and Distribution of Uses, Green and Blue Infrastructure and Responsive Built Form that are required when creating places of high quality and distinct identity. Appendix D sets out a ‘Design Checklist’ which should be incorporated in new residential development as follows.

A Design Statement responding to the 4 criteria above has been prepared and accompanies the documentation. The response to the criteria is summarised below.

**Table 3: Summary of Design Statement Response to the Specific Criteria**

No	Topic	Response
<b>1</b>	<b>Sustainable and Efficient Movement</b>	
(i)	Permeable and legible network of streets and spaces within the site	<p>A fundamental part of the design of the development is the realignment and extension of Balcurriss Road to connect to Ballymun Road to the east and Balbutcher Lane to the north, where currently there is no such access at present.</p> <p>In addition to this new spine route running north-south, a new axis running from east to east will be established connecting a series of new, quality urban spaces.</p> <p>St. Pappin’s Square which will be the most prominent and significant space in the northern end of Ballymun itself.</p> <p>This will connect solely via a pedestrian and dedicated cycle route via a new centrally located pocket park overlooked by Sites 5, 15, 17 as well as the existing Santry Cross development, further pocket green areas in front of Site 17 and associated Community Space, with the cycle route continuing westward along the southern facade of Site 18</p>

No	Topic	Response
(ii)	Connections with and between established communities, services and other uses	<p>to Balcurris Park. This link also heads north to Balbutcher Road, providing a safe alternative route.</p> <p>The layout of the site attempts to repair the lack of connectivity between existing housing in Balcurris Gardens and Close to the south and west and the cluster of apartment blocks to the north in Santry Cross.</p> <p>Each of these developments have remained in an incomplete stage since around 2009 when the last of the old 1960s blocks were finally demolished freeing up land for new development.</p> <p>The proposal seeks to promote the opportunities connections present on the ground for example, a new streetscape to the opposite side of Balcurris Close and Balcurris Gardens will provide a safe and attractive environment for residents to travel within this new neighbourhood between established communities.</p> <p>The existing flight of stairs and ramp at the southern end of the Santry Cross apartment cluster between the Charter Apartment and Turnpike Apartments will be celebrated as part of the new public realm being proposed for St. Pappin's Square.</p> <p>This access point will form a new gateway into the scheme along a new pedestrian route through the square.</p> <p>The design provides for ground floor uses, retail/ commercial as well as community/ cultural/ arts and childcare which are concentrated toward the eastern part of the site near Ballymun Road, St. Pappin's Square and the central pocket park, encouraging movement from the nearby residential neighbourhoods.</p>
(iii)	Streets designed in accordance with DMURS	<p>One of the main components of the scheme is the realignment of Balcurris Road, which currently follows an ad-hoc route from the south acting as the only vehicular route into the residential dwellings of Balcurris Close, Balcurris Gardens and Balcurris Park East. This is a result of its previous use as a parking area for the 1960s flats, since demolished.</p> <p>The design seeks to extend this route north to connect with an existing access route that serves the parking undercroft in the Linnbhla Apartments, and eastward toward to connect with Ballymun Road itself.</p> <p>The original vision for Balcurris Road as to serve as an alternative to traffic using the Ballymun Road toward Balbutcher Lane, and was designed as more of a distributor road in the earlier iteration of the Ballymun masterplan. This resulted in parallel access streets serving residential areas to the west creating incidental sterile leftover strips of public realm.</p> <p>The proposal now seeks to promote a network of streets, not roads, and with its tight radii and widths promote traffic calming. This is</p>



No	Topic	Response
		<p>further reinforced by a series of raised crossing tables of generous width for pedestrians and cyclists alike.</p> <p>Any spaces between the streets and buildings is put to good use, in the creation of meaningful public realm and not incidental unusable space.</p>
(iv)	Quantum of parking minimised	<p>There are 70 car parking spaces, all on-street, in the proposed development. These include 4 accessible spaces to serve the 288 dwellings and other non-residential uses in the scheme.</p> <p>None of the spaces are allocated to any particular unit or dwelling. There are also 5 loading/ delivery bays included distributed around the site.</p> <p>The parking is arranged in small clusters, mostly parallel bays, interspersed with street planting reducing its visual impact.</p> <p>It is viewed that public transport in the immediate vicinity is improving over time. Firstly with Busconnects coming on stream, and in the longer term the delivery of Metrolink with a stop scheduled for Ballymun itself.</p>
<b>2</b>	<b>Mix of Land Uses (Vibrant Centres and Communities)</b>	
(i)	Mix and intensity of land uses appropriate to the site	<p>The uses proposed for the development are deemed compatible with the zoning:</p> <p>Z1 - 'Sustainable Residential Neighbourhoods'- Objective: To protect, provide, and improve residential amenities</p> <p>Z4- 'Key Urban Villages and Urban Villages- Objective: To provide for and improve mixed-services facilities</p> <p>Z9- 'Amenity/Open Space Lands/Green Network'- Objective: To preserve, provide and improve recreational amenity, open space and ecosystem services.</p> <p>The LAP states a residential density of 150 uph/ The SDRA 100-250uph reducing to 50 uph in neighbourhoods.</p> <p>The density achieved in the proposal is 103.6 d/ha. gross and 126.1d/ ha. net. this is considered appropriate,given the site's location within Ballymun town centre.</p>
(ii)	Diverse and varied range of housing types	<p>The proposed development consists of 20 types/ variants of apartment configuration and 2 housing types across 137 no. 1-bedroom units, 85 no. 2-bedroom units, 64 no. 3-bedroom units and 2 no. 4-bedroom units.</p> <p>The proposed development is for general needs housing. The brief has been derived from a Housing Needs Demand Assessment of the area. The resultant mix of 1, 2, 3 and 4 bed apartments, maisonettes and houses provide for those needs.</p>

No	Topic	Response
		Furthermore, in compliance with DCC, 25% of the Apartments have been designed in accordance with Universal Design Principles.
(iii)	Support the regeneration and revitalisation of an existing centre or neighbourhood	<p>While the site forms part of an ongoing regeneration of Ballymun town centre, there is no existing building stock in the site itself.</p> <p>What buildings that may have been available were demolished c. 15 years ago due to their poor condition</p>
(iv)	Enhancement of the public realm	<p>A critical component of the success of the scheme is the delivery of public realm, in particular the creation of a new public space, St. Pappin's Square to the north of Site 5 in accordance with the LAP briefing document.</p> <p>Other areas of public realm being proposed, such as the central pocket park are key to the wellbeing of the new neighbourhood being created. In conjunction with these spaces is the creation of an attractive streetscape along Balcurris Road.</p>
<b>3</b>	<b>Green and Blue Infrastructure (Open Space, Landscape and Heritage)</b>	
(i)	Positively responded to natural features and landscape character	<p>The principal open space proposed, St. Pappin's Square is designed in part to respect the old church building on the opposite side of Ballymun Road, its southern splay aligning with this vista.</p> <p>Mitchell and Associates are the landscape architects for the project and they have developed a landscaping strategy for the scheme. The proposed development at will include four areas of landscape amenity space-</p> <ul style="list-style-type: none"> <li>• The streetscape and green link along Balcurris Road and south side of site 5</li> <li>• A public pocket park in the centre of the development, St Pappin's Square</li> <li>• Communal courtyards to sites 5, 17 and 18, and</li> <li>• A crèche garden located in the courtyard of site 5.</li> <li>• The spaces are designed to maximise biodiversity, recreational amenity, permeability and incorporate nature-based SUDS.</li> </ul> <p>Five main nature based solutions are proposed to be incorporated into the SUDS strategy:</p> <ul style="list-style-type: none"> <li>• Permeable paving - to all car parking, communal courtyards and pedestrian footpaths in central pocket park</li> <li>• Green roofs</li> <li>• Rain gardens to attenuate excess water from the roofs</li> <li>• Bioretention tree pits to streets</li> <li>• Planted detention basins with native biodiversity planting, lawn and stepping stones to pocket parks and courtyards of sites 5 and 17</li> </ul>

No	Topic	Response
(ii)	A complementary and interconnected range of open spaces, corridors and planted / landscaped areas	<p>The main areas of open space in the development are interlinked, primarily by a new dedicated cycle route forming an east-west axis between St. Pappin’s Square in the east to Balcurris Park in the west.</p> <p>In between this axis traverse the central pocket park and the smaller pocket of landscaping alongside the active ground floor community space in Site 17.</p>
(iii)	Public open spaces universally accessible and designed to cater for a range of active and passive recreational uses	<p>All of the public realm and open spaces are fully accessible as are the routes that link these.</p> <p>The detailed description in Chapter 7 of this report as well as that produced by Mitchell and Associates, sets out how each of these spaces are subdivided to promote a range of uses and users.</p>
<b>Integrated Nature-Based Solutions for the Management of Urban Drainage</b>		
	Integration of nature-based solutions for the management of urban drainage, to promote biodiversity, urban greening, improved water quality and flood mitigation	<p>The design features extensive active SUDs measures, including tree pits, green and blue roofs, and permeable paving.</p> <p>Interception storage is proposed through a combination of the blue roofs and the permeable paving solution, and a stone storage area.</p> <p>A detailed engineering report has been prepared by MORCE and is included with the application</p>
<b>4</b>	<b>Responsive Built Form</b>	
(i)	Coherent and legible urban structure in terms of block layouts and building heights	<p>The building forms and heights follow primarily takes their lead from the briefs for each of the sites in the development (Nos. 5, 15, 16, 17,18 in the LAP) as well as objectives SDRA01 and Appendix 3 of City Development Plan, Section 4.1 Identification of Areas for Increased Height and Density.</p> <p>The assemblage of the combination of these blocks also helps create a series of meaningful and well-proportioned spaces and streets between.</p> <p>The blocks stitch together existing development to create a new legible urban grain for Ballymun. A series of spaces that interconnected, a hierarchy of building height focused on St. Pappin’s Square, transitioning toward the 2-storey development further west and south.</p> <p>The development has been tested in terms of daylight and sunlight penetration and to maintain the residential amenity of its neighbours</p>
(ii)	Buildings address streets and spaces	<p>Own door unit, residential core entrances, and a continuous facade of retail/ commercial/ community/ cultural uses are provided at ground level to create increased activity and vibrancy to the streets.</p> <p>A defensible zone of soft planting to ground floor residential is maintained around the building creating a clear buffer between public and private areas.</p>

No	Topic	Response
		Balconies and windows are provided to all facades facing onto public and communal areas creating full passive surveillance of the development and the existing public streets.
(iii)	Layout, scale and design features of new development respond to prevailing development patterns (where relevant)	<p>The building forms and heights follow primarily takes their lead from the briefs for each of the sites in the development (Nos. 5, 15, 16, 17,18 in the LAP) as well as objectives SDRA01 and Appendix 3 of City Development Plan, Section 4.1 Identification of Areas for Increased Height and Density.</p> <p>The heights range from 2 up to 6 storeys maximum, and are carefully calibrated to the particular location within the scheme and how they relate to adjoining development, in particular Site 17 is designed to complete the urban perimeter that had been started by the Santry Cross development, and is sensitive in its height and undulation relative to the existing apartment buildings.</p> <p>A detailed daylight and sunlight analysis has been prepared to show how the proposal has been developed to respond to and protect the existing amenity of the surrounding buildings.</p> <p>Ballymun has a unique history in terms of urban character and renewal from past mistakes; its evolving urban character now developing into a vibrant network of streets and places.</p>
(iv)	Coherent architectural and urban design strategy	<p>The overall development follows a simple but robust palette of materials and details in order that there is a cohesion in the character of the neighbourhood it seeks to create;</p> <p>Such as 2 contrasting brick types to create a play on layering and form, similar building forms such as the framed device to hold together compositions of balconies, similar fenestration and colours.</p>

Section 5 of the Apartment Guidelines 2023 sets out locations suitable for increased densities with 5.7 focussing on development on brownfield sites. It recognises that where sites are located close to existing or future transport corridors, the opportunity for their re-development to higher densities should be promoted.

The proposed density is 131.1 uph net. It is aligned with the recommended density in the Dublin City Development Plan 2022-2028.

Section 28 of the Planning and Development Act 2000, as amended, provides that planning authorities and An Bord Pleanála shall have regard to Ministerial Guidelines and shall apply any specific planning policy requirements (SPPRs) of the Guidelines. Four SPPRs are included. These are addressed in the table below.

**Table 4: Sustainable and Compact Settlement Guidelines SPPRs**

SPPR No.	Summary	Development Compliance
<b>SPPR 1</b>	<b>Separation Distances</b> When considering a planning application for residential development, a separation distance of at least 16m between opposing	The proposed development does not give rise to any separation distance between opposing windows of less than 16m.



SPPR No.	Summary	Development Compliance
	<p>windows serving habitable rooms 16 at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.</p>	
<b>SPPR 2</b>	<p><b>Minimum Private Open Space Standards for Houses</b>                      Proposals for new houses meet the following minimum private open space standards: 1 bed house 20 sq.m; 2 bed house 30 sq.m; 3 bed house 40 sq.m; 4 bed + house 50 sq.m</p>	<p>Five houses are proposed (3 no. 3-bed and 2 no. 4-bed). The SPPR's requirements in relation to private to open space are met. Please refer to the Housing Quality Assessment (HQA).</p>
<b>SPPR 3</b>	<p><b>Car Parking</b>                      In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling</p>	<p>A total of 70 no. car parking spaces have been proposed. This translates to a ratio of 0.24 spaces per residential unit. Owing to the site's location and proximity to existing and proposed high-quality transport, the proposed car parking provision is considered appropriate.</p>
<b>SPPR 4</b>	<p><b>Cycle Parking and Storage</b>                      Safe and secure cycle storage facilities to meet the needs of residents and visitors. A general minimum standard of 1 cycle storage per bedroom should be applied. Visitor cycle parking should also be provided.</p>	<p>A total of 551 no. long stay cycle parking spaces are provided. This is in excess of the requirement for 503 spaces.</p> <p>180 no. short stay cycle parking spaces are provided.</p> <p>This provision is in accordance with the Dublin City Development Plan standards and is appropriate to meet the needs of residents and visitors for the profile of this future resident community,</p>

**Policy and Objective 5.1**

*Public Open Space The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas..... in some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity.*

The proposed development provides for 4,267 sqm of public open space or 15.95% of the net site area. 2,969 sqm of communal Open Space are also provided and is therefore in accordance with the Guidelines' Policy Objective.

#### 7.2.4 Design Manual for Urban Roads and Streets (DMURS) (2019)

Section 1.2 sets out the national policy background that states street layouts should be interconnected to encourage walking and cycling and offer easy access to public transport.

Section 3.2 identifies types of streets. Arterial streets are major routes, link streets provide links to arterial streets or between neighbourhoods, while local streets provide access within communities and to arterial and link streets.

Section 4.4.3 states that radii on turns from a link street to a local street may be reduced to 4.5m. A maximum radius of 1-3m should be used on local streets. Section 4.4.1 states that the standard carriageway width on local streets should be 5-5.5m, or 4.8m where a shared surface is proposed.

Compliance with the requirements of DMURS can be found in the drawings and Traffic and Mobility Management report prepared by Malone O'Regan. The internal road network within the development will have a carriageway width of 5.5m and a footpath generally 2.3m wide in accordance with the guidance set out in DMURS. Visibility splays in excess of this are achieved from the proposed development access to the surrounding road network once site clearance has been completed.

#### 7.2.5 Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2023)

The key relevant SPPRs are summarised in the table below. Houses are excluded from the assessment.

SPPR No.	Summary	Development Compliance
<b>SPPR 1</b>	<p><b>Mix of units to include:</b></p> <ul style="list-style-type: none"> <li>Up to 50% one-bed or studio type units;</li> <li>No more than 20-25% of the total proposed development as studios;</li> <li>No minimum requirements for 3-bed. CDP may specify a mix for apartments</li> </ul>	<p>The proposed development includes 272 apartment type units. The breakdown is as follows:</p> <ul style="list-style-type: none"> <li>138 no. one-beds or 48.8%</li> <li>87 no. two-beds or 30.7%</li> <li>58 no. three beds or 20.5%</li> </ul> <p>The development complies.</p>

SPPR No.	Summary	Development Compliance
	subject to a Housing Need and Demand Assessment.	
<b>SPPR 2</b>	<p><b>Minimum Apartment Floor Areas</b></p> <p>Studio apartment (1 person) - 37 sq.m</p> <p>1-bedroom apartment (2 persons) 45 sq.m</p> <p>2-bedroom apartment (3 persons) 63 sq.m (subject to a max of 10% of overall units)</p>	Please refer to the schedule of accommodation and Housing Quality Assessment (HQA) and which demonstrates compliance. All units meet the floor area requirement. HQA sets out in table format the floor area of each apartment and the compliance with the Guidelines
<b>SPPR 3</b>	<p><b>Minimum Apartment Floor Areas</b></p> <ul style="list-style-type: none"> <li>• Studio apartment (1 person) 37 sq.m</li> <li>• 1-bedroom apartment (2 persons) 45 sq.m</li> <li>• 2-bedroom apartment (3 persons) – 63 sq.m</li> <li>• 2-bedroom apartment (4 persons) 73 sq.m</li> <li>• 3-bedroom apartment (5 persons) 90 sq.m</li> </ul>	Please refer to the HQA. Minimum floor area requirements are met.
<b>SPPR 4</b>	<p><b>Dual Aspect</b></p> <p>(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.</p> <p>(ii) (ii) and (iii) do not apply.</p>	152 units or 57.6% of the units are dual aspect. The development complies.
<b>SPPR 5</b>	<p><b>Floor to ceiling heights</b></p> <p>Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use.</p>	The proposed floor to ceiling height of ground floor units is 2.7m in accordance with this specific policy.
<b>SPPR 6</b>	<p><b>Apartments per core</b></p> <p>A maximum of 12 apartments per floor per core may be provided in apartment schemes.</p>	The proposed development complies with SPPR 6.

A number of non-specific standards are provided in the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2023) (Apartment Guidelines 2023) which are outlined below and compliance thereto. This section should be read in conjunction with the Architect's Housing Quality Assessment (HQA).

### *Minimum Quantitative Standards*

Appendix I of the Design Standards for New Apartments - Guidelines for Planning Authorities (2020) sets out minimum quantitative standards for bedroom floor areas, storage space, communal amenity space and private amenity space. Please refer to the HQA and the floor plans of each of floor which demonstrate the bedroom and other rooms sizes.

The development would generate a requirement for 1,821 sqm of communal open space. The proposed development includes c. 2,969 sqm of communal open space which is well in excess of the minimum requirement.

### *Size in excess of ten percent floor area*

Section 3.8 (a) of the Design Standards for New Apartments – Guidelines for Planning Authorities provide that 'the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom units types by a minimum of 10%.....'. The HQA demonstrates compliance.

### *Play areas*

The Apartment Guidelines 2020 indicate minimum requirements for play areas of schemes of a certain size. The proposed development includes 129 no. 1- bed units, 85 no. 2-bed and 50 no. 3-bed. It therefore gives rise to the need to provide 85-100 sqm for a small play area and gives rise to the need to provide for an older children and young teenagers play area of 200 to 400 sqm as the development would include 145 units which are two-bed or more. One large play area is located centrally to the development. It will serve both younger and older children.

### *Cycle Provision*

Design Standards for New Apartments – Guidelines for Planning Authorities provide the following: Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. Given the proposed housing mix, the guidelines would therefore require the provision of 486 long-stay and 142 no. short stay spaces to serve the development.

The proposed development includes 551 long stay and 180 short stay spaces for residents. These are sheltered and located in dedicated secure stores It therefore complies with the requirement.

It is important to note here that the cycle parking provision in the Apartment Guidelines 2023 are not SPPRs where they are mandatory. Deviation from the standard is at the discretion of the Planning Authority. In addition,

the proposal includes non-residential uses such as creche, retail/ commercial and community, arts and cultural space and therefore the proposed bicycle provision has been designed in accordance with the standards of the Development Plan.

### Car Parking

The Design Standards for New Apartments - Guidelines for Planning Authorities state that '*the default policy is for car parking provision to be minimised substantially reduced or wholly eliminated in certain circumstances*'. This policy is applicable in 'highly accessible area such as in or adjoining city cores or at the confluence of public transport systems such rail and bus stations located in close proximity'. The site, being located in a central and/or accessible urban location, avails of lower parking standards. 70 no. spaces are provided within the site, which equate to a ratio of 0.24.

### Content of Planning Applications

*The Design Standards for New Apartments - Guidelines for Planning Authorities* require that certain documents be prepared.

1. A Housing Quality Assessment (HQA) accompanies this part 8 application. It includes compliance with the 10% additional space compliance and details of proposed private amenity, storage space and aspect.
2. A daylight and sunlight analysis report by Digital Dimensions is provided. It reviews level of natural light in the proposed development. This report has regard to the provisions of BR209:2022 Site Layout Planning for Daylight and Sunlight (Third edition), also referred to as the BRE guidelines, BS EN 17037:2018+A1:2021 Daylight in Buildings, also referred to as the UK Annex. and IS EN 17037:2018 Daylight in Buildings. Please refer to the Sunlight & Daylight Assessment prepared by Digital Dimensions for the results of the study.
3. A building lifecycle report accompanies this application. The report addressed management and energy efficiency.

### 7.2.6 Urban Development and Building Height – Guidelines for Planning Authorities (2018)

The Urban Development and Building Height Guidelines for Planning Authorities 2018 (Building Height Guidelines 2018) were published to support the achievement of some of the policies and objectives of the NPF 2040, to secure compact and sustainable urban growth, particularly on brownfield and infill sites and that optimal capacity of sites should be sought. This may involve increased height where it can be demonstrated that it complies with certain parameters. The Dublin City Development Plan 2022-2028 reflects the content of these guidelines.

Section 1.10 requires Development Plans and Local Area Plans to support a least 6 storeys at street level in town centre areas along with scope for greater height, subject to meeting performance-based criteria. Standard Building height is considered 6-8 storeys.

Section 2.11 recognises that policy direction relating to height is a matter for the development plan which identifies suitable areas for increased height.

The Dublin City Development Plan 2022-2028 applies to the subject site. The proposed development provides for a range of height from 2 to 6 storeys, which is within the permissible envelopes of the Dublin City Development Plan. It also allows for higher density.



The key relevant Specific Planning Policy Requirements (SPPRs) are summarised as follows:

**Table 5: Building Height SPPRs**

SPPR	Summary	Application of Consistency
SPPR 1	<p>Planning Authorities are responsible for identifying appropriate locations for building heights in their statutory plans and that no blanket 'numerical' height shall be applied.</p>	<p>Dublin City has identified the applicable heights through the Ballymun LAP. The LAP has identified height for the sites in the site briefs. The LAP pre-dates the guidelines.</p> <p>Further assessment is provided in relation to the Dublin City Development Plan (CDP) 2022-2028.</p>
SPPR 2	<p>In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy.</p>	<p>The proposed development is located in the Ballymun Key Urban Village which is to provide a focal point to the community and neighbourhood. This role is reflected in the zoning Z4 which applies to the larger part of the site. As a result, the proposed development includes a mix of residential, community and retail / commercial uses.</p>
SPPR 3	<p>It is a specific planning policy requirement that where;</p> <p>(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.</p> <p>(B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority ( where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme</p> <p>(C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.</p>	<p>The development management criteria are addressed in Table 7.</p> <p>The proposed development is not located in a Strategic Development Zone Planning Scheme.</p>

SPPR	Summary	Application of Consistency
SPPR 4	Not applicable, refers to greenfield or edge of city/town locations.	This SPPR does not apply.

Development management criteria are set out under **section 3 of the Guidelines**. These are addressed in the table hereafter. It is noted that there is no applicable height cap in the City Development Plan which would preclude such height on the application site. However, heights have been set out through the individual site briefs of the Ballymun LAP 2017 as extended, the CDP reviewed whether there was scope for additional height in any of the site. The CDP established that with the exception of a few sites, the approach to building height and density, particularly along the Main Street and near to quality public transport will remain appropriate.

**Table 6: Development Management Criteria**

Scale	Criteria	Response
<b>City/Town</b>	The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	<p>The site’s main frontage is on the Ballymun road which avails of high quality, high frequency bus service.</p> <p>The Ballymun Road is also located on the Finglas to City Centre BusConnects corridor. The proposed MetroLink situation would be situated across from the Axis, also on the Ballymun Road, around 350m south of the site.</p> <p>Overall, the proposed development avails of excellent accessibility to existing and proposed public transport links.</p> <p>A key priority of the Development Plan is to create sustainable neighbourhoods, with a range of households types and tenures located in close proximity to community facilities and services in order to deliver sustainable patterns of development in line with the principles of the 15-minute city. The subject site is ideally situated in close proximity to existing amenities and services to realise this ambition.</p>
	Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	<p>The development is not located in an architecturally sensitive area. It proposed heights ranging from 2 to 6 storeys.</p> <p>The site has been vacant for over ten years. The lack of development gives the Ballymun Road an incomplete and incoherent interface to the west. The proposed development will provide this missing frontage, adding scale and enclosure to the wide road. In addition, the development incorporates transitions in heights to espouse the context. Existing buildings fronting the Ballymun Road are generally at least 5-storey high. Buildings to the</p>

Scale	Criteria	Response
		<p>west of the site comprise two-storey housing. The proposed heights are cognisant of existing heights in the area.</p> <p>The proposed development is of modest scale and generally within permissible heights envisaged by the Dublin City Development Plan, specifically the Ballymun LAP and SDRA and would not warrant a landscape and visual assessment. CGIs accompany the part 8 application showing how the development fits it with its surroundings.</p> <p>It is important to note that the site has two key frontages, the one on the Ballymun Road, discussed above and the one facing the Balbutcher Lane.</p> <p>The height proposed on Balbutcher Lane is 5 storey high. This will reinforce the building frontage at the location. Currently the vista travelling from the M50 toward the south is interrupted and consists of the Linbhla complex at the corner, a vacant site and low density housing further west. This gives an unfinished and disjointed outlook to this key entrance to Dublin City. The block proposed along this frontage will allow to harmonise the built fabric and give definition to an important edge of the Dublin City settlement boundary.</p> <p>Site 17 includes a 6-storey pop up element. This urban block is to allow for the completion of the incomplete Linbhla urban cell. It would add to the legibility of the area.</p> <p>Overall, it is considered that the proposed 6 storeys pop up, in combination with the proposed range of 2-5 heights is appropriate, which has been based on an evaluation of the sites attributes and establishes variety in height across the site while having regard to the Appendix 3 of the Dublin City Development Plan 2022-2028.</p> <p>Further assessment is provided in this report in response to Appendix 3 of the Dublin CDP 2022-2028 in the appendix 1 of this report.</p>
	<p>On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to</p>	<p>As stated above, the proposed development makes positive contribution to place-making. The site has laid vacant since the demolition of the Ballymun flats over ten years ago. There has been no landscaping.</p>

Scale	Criteria	Response
	<p>achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</p>	<p>The proposed development will make a positive contribution to place-making in the area. It will result in the provision of the new St Pappins Square.</p> <p>The new frontages on Balbutcher Lane and the Ballymun Road will strengthen the built fabric and provide scale and focus to the area.</p> <p>The proposed development is located in a SDRA and Key Urban Village. It will provide for a mixture of uses, including community and retail/commercial. These uses will be located at ground floor and will create internal movements and between the site and the surrounding areas. As these are laid around the Square, the square will become a place to socialise and linger.</p> <p>As stated above, the development will allow for the completion of the incomplete Linbhla urban cell.</p> <p>The proposed massing and block forms have been utilised to achieve a scale of development that meets the required density on the site. The surrounding scale of development adjoining the site varies considerably. The proposed development responds to the prevailing context while also achieving the required density of a site located within a SDRA and in proximity to existing, permitted and proposed high-quality public transport.</p>
<p><b>District / neighbourhood / street</b></p>	<p>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</p>	<p>The site has laid vacant for over ten years. Its development which includes a public square, community uses and commercial and retail space will make positive contribution to the neighbourhood and the streetscape, both on the Balbutcher Lane frontage and the Ballymun Road frontage.</p> <p>Whilst the increase in scale of development on this site will result in a transformation of the immediate streetscape it is considered that the design and scale of development and the gradual transition of height will ensure the development is not overbearing to these properties to the north, west and south.</p>

Scale	Criteria	Response
	<p>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</p>	<p>The proposed development is not monolithic. In planning policy terms, it consists of five development sites, each with their own design criteria set out in the Ballymun LAP. There is therefore a variety of building heights proposed across the site.</p> <p>In addition, the proposed development is cognisant of prevailing heights in the areas, with taller buildings located along the main arteries, especially the Ballymun Road and heights decreasing incrementally away from the Ballymun Road. The proposed development has taken applied the same approach with taller buildings proposed along the existing streets to the north and east, and height decreasing toward the west.</p>
	<p>The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).</p>	<p>As stated in response to the previous criteria, the proposed development will enhance the urban design context. The site has been vacant for over ten years. As a result, this part of the Ballymun Road has lacked cohesion and focus.</p> <p>The development will provide a better sense of scale to the Ballymun Road, particularly as the other side of the road is also low rise. This reinforces the thoroughfare aspect of the Ballymun Road to the detriment of place-making. The development will allow to enclose the street better, creating areas of interest and focus (the playground and the new St Pappins Square).</p> <p>The development will not give rise to flood risk issues within the site or outside the site.</p>
	<p>The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner</p>	<p>As stated above, there is a clear lack of cohesion in this particular part of the Ballymun Road due to the dominance of the vacant site over the streetscape. The proposed development has a clear delineation of streets and spaces and includes internal road layouts defined by new buildings with varying heights that appropriately respond to prevailing heights.</p> <p>The proposed development will make positive contribution to the improvement of legibility through the area.</p>
	<p>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</p>	<p>The proposed development includes a mix of houses and apartments, some of which are own-door apartments. The mix ranges from the 1 to the 4-bed units.</p>



Scale	Criteria	Response
		<p>Across the development site, 44.4% of the units are one-bed. The existing stock includes 7.9% of one-bed units, compared to 35% two-bed unit. In this regard, it is considered that the development will make positive contributions to the dwelling typologies in the area, in addition to expanding the community and retail/commercial offer.</p>
<p><b>Site / Building</b></p>	<p>The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</p>	<p>A sunlight and daylight assessment prepared by Digital Dimensions is enclosed with this application. Please refer to this report for further information.</p> <p>The Design Statement sets out in detail the design rationale of the scheme. The majority of apartment are dual or corner aspects. There are no single aspect north facing units proposed. All apartments have been designed to include generous storage provision. The layout is consistent over each storey so as to avoid noise transmission across units.</p>
	<p>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'</p>	<p>A sunlight and daylight assessment prepared by Digital Dimensions is enclosed with this application. Please refer to this report for further information.</p>
	<p>Where a proposal may not be able to fully meet all 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, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints 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.</p>	<p>We refer to the enclosed Sunlight &amp; Daylight report. The proposal meets all the requirements. No compensatory measures are required.</p>
<p><b>Specific Assessment</b></p>	<p>Specific impact assessment of the micro-climatic effects such as down draft. Such assessments shall include measures to avoid/ mitigate such</p>	<p>A micro-climate study has been prepared to accompany this application. It found that the development is designed to be a high-quality environment i.e comfortable and pleasant for</p>

Scale	Criteria	Response
	micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro climatic effects where taller buildings are clustered.	potential pedestrians and that it does not introduce any critical impacts on the surrounding buildings or nearby adjacent roads.
	In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision	An AA Screening has been prepared by NM Ecology and is enclosed with this submission. The AA Screening concludes that there is no risk to Natura 2000 interest identified. A winter birds survey has also been prepared by NM Ecology and has been used to inform the preparation of a Preliminary Ecological Appraisal.
	An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.	The development is not of such scale that this assessment is required.
	An assessment that the proposal maintains safe air navigation	The development is not of such scale that this assessment is required.
	An urban design statement including, as appropriate, impact on the historic built environment	A Design Statement has been prepared by MCORM and is enclosed with this application. There is no impact on the historic built environment.
	Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate	An AA Screening has been prepared by NM Ecology and accompanies this application.  An EIA Screening has been prepared and is enclosed with this application. These are summarised at the final sections of this report. SEA does not apply.

### 7.3 Regional Policy

#### 7.3.1 Regional and Spatial Economic Strategy for the Eastern and Midlands Region

The Regional Economic and Spatial Strategy (RSES) considers that Dublin City and suburbs will be home to 1.4 million people and supports the consolidation and re-intensification of infill, brownfield sites, to provide high density and people intensive uses within the existing built up areas, and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects. Ballymun is located in the Strategic Development Areas referred to as the City Centre within the M50.

The Growth Strategy for the EMRA seeks to deliver sustainable growth of the Dublin Metropolitan Area through the Dublin Metropolitan Area Strategic Plan. It promotes compact growth to realise a target of at least 50% of all new homes to be built, to be within the existing built-up area of Dublin City and suburbs. In Dublin City and suburbs the focus lies on the redevelopment of infill and brownfield sites (RPO 3.3 and RPO 4.3) and considers that development should align with the prevailing national guidelines.

Chapter 9 of the RSES particularly focuses on quality of life in the form of consideration of age, diversity, housing and community. The RSES are supportive of greater diversity in housing tenure and type (RPO 9.3). It recognises

the importance of social and community infrastructure (RPO 9.14) and for it to be tailored to the needs of those it serves.

The development complies with the principles of the RSES. It will support the consolidation of the urban fabric and is located on an infill site. It also a number of community facilities and is within minutes' walk of public transport.

## 7.4 Local Policy

### 7.4.1 Dublin City Development Plan 2022-2028

#### *Strategic Objectives*

The Dublin City Development Plan (CDP) 2022-2028 is articulated around a number of strategic principles to support a sustainable approach to the development of the city. Under the social/residential principles, the plan seeks to create a more compact city with a network of sustainable neighbourhoods, modelled on the principles of the 15-minute city. This is underpinned by the provision of a range of facilities, choice of tenure and house types to promote social inclusion and integration of all ethnic / minority communities. It also seeks to create a 'connected, legible and liveable city with a distinctive sense of place, based on active streets, quality public spaces and adequate community and civic infrastructure' under the Urban Form Principle.

The Core Strategy and Settlement Hierarchy present the spatial structure and proposed residential yield in the various areas of the City. The site is located within The North-West MASP corridor. It has a planned yield of 2,200 to 2,350 units.

Under CSO7 '*Promote Delivery of Residential Development and Compact Growth*', the Council seeks '*To promote the delivery of residential development and compact growth through active land management measures and a coordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas.*' The proposed development is fully aligned with CSO7 as the site is an underutilised infill site with a residential zoning. The site will allow consolidating the urban fabric in the area. Under CSO 10, it supports the development of brownfield, vacant and regeneration sites, such as the subject site.

#### *Zoning*

The Dublin City Development Plan (CDP) 2022-2028 applies three zonings to the site:

- A portion of the site, principally site 18 to the north-west, facing the Balbutcher Lane and Balcurris Park, is zoned Z1 '*Sustainable Residential Neighbourhoods*' which objective is to '*protect, provide and improve residential amenities*'.
- The majority of the site is zoned Z4 '*Key Urban Village/Urban Village*' which objective is '*to provide for and improve mixed-services facilities*'.
- A very small amount of lands are zoned Z9 '*Amenity / Open space / Green Network*' which objective is '*to preserve, provide and improve recreational amenity, open space and ecosystem services*'.

Permissible uses under Z1 include '*Assisted living/retirement home, buildings for the health, safety and welfare of the public, childcare facility, community facility, cultural/recreational building and uses, delicatessen, education, embassy residential, enterprise centre, halting site, home-based economic activity, medical and related consultants,*

*open space, place of public worship, public service installation, residential, shop (local), sports facility and recreational uses, training centre'.*

Permissible uses under Z4 are more varied given the function of Z4 lands and include *'Amusement/leisure complex, assisted living/retirement home, bed and breakfast, buildings for the health, safety and welfare of the public, café/tearoom, car park, car trading, childcare facility, civic offices, community facility, craft centre/ craft shop, cultural/recreational building and uses, delicatessen, education, embassy office, enterprise centre, financial institution, garden centre/ plant nursery, guesthouse, halting site, home-based economic activity, hostel (tourist), hotel, industry (light), live-work units, media-associated uses, medical and related consultants, mobility hub, motor sales showroom, office, off-licence, off-licence (part), open space, park and ride facility, petrol station, place of public worship, primary health care centre, public house, public service installation, recycling facility, residential, restaurant, science and technology-based industry, shop (district), shop (local), shop (neighbourhood), sports facility and recreational uses, take-away, training centre, veterinary surgery.'*

Permissible uses under Z9 are very restricted given the objective of the site. They include *'allotments, cemetery, club house associated with the primary Z9 objective, municipal golf course, open space, public service installation'.*

Key Urban Villages/Urban Villages (KUV) are planned to *'serve the needs of the surrounding catchment providing a range of retail, commercial, cultural, social and community functions that are easily accessible by foot, bicycle or public transport, in line with the concept of the 15-minute city'.*

The uses proposed across the site are compliant with the permissible uses across the different zoning. In relation to the Z9 zoning, given its location at the most northwestern edge of the site, it was deemed appropriate to provide a walkway. There is no overlap between the blocks proposed on site 18 and the Z9 lands.

An extract of the zoning map is presented hereafter.

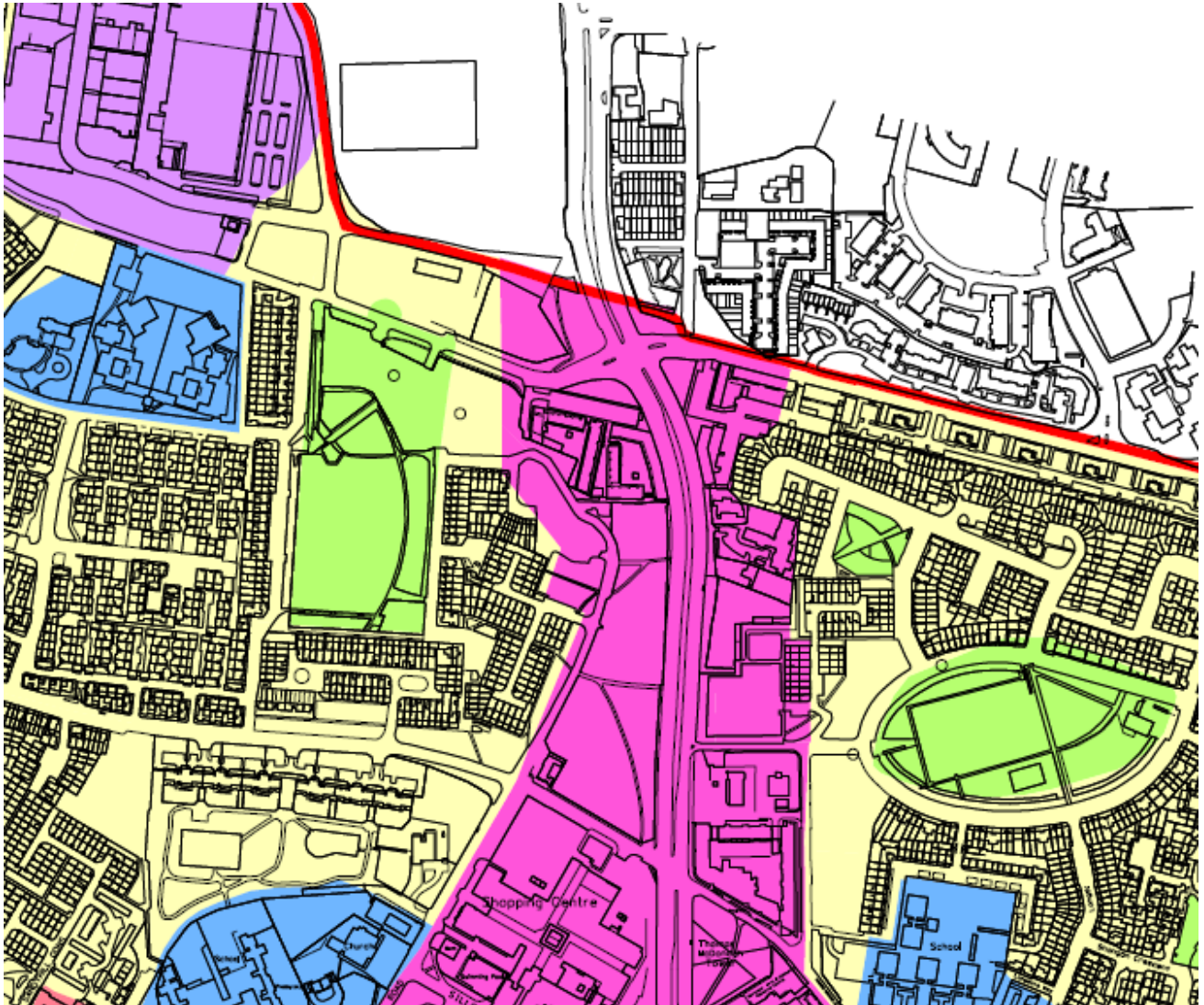


Figure 18: Extract from Zoning Map B (Source: DCC)

The CDP further requires that proposals for development in KUV/Urban Villages should be in accordance with the following principles:

- **Mixed use:** promote an increased density of mixed use development including residential development with diversity in unit types and tenures capable of establishing long-term integrated communities.
- **Density:** Ensure the establishment of higher density development capable of sustaining quality public transport systems and supporting local services and activities. Encourage the development/redevelopment of under-utilised sites and intensification of underutilised areas such as surface parking. Opportunity should be taken to use the levels above ground level for additional commercial/retail/services or residential use.
- **Transport:** Ensure provision is made for quality public transport systems. Provide improved access to these systems and incorporate travel plans, which prioritise the primacy of pedestrian and cyclist movement and address the issue of parking facilities and parking overflow. Ensure that enhanced connectivity and permeability is promoted.
- **Commercial/Retail:** Promote the creation of a vibrant retail and commercial core with animated streetscapes. A diversity of uses should be promoted to maintain vitality throughout the day and evening.



- **Community and Social Services:** *Encourage these centres to become the focal point for the integrated delivery of community and social services.*
- **Employment:** *Encourage the provision of employment uses incorporating office, work hub, live-work units, professional and financial services, and the creation of small start-up units.*
- **Built Environment:** *Ensure the creation of high-quality, mixed-use urban districts with a high quality public realm, distinctive spatial identity and coherent urban structure of interconnected streets and child-friendly, accessible public spaces and urban parks. Development should have regard to the existing urban form, scale and character and be consistent with the built heritage of the area.'*

The proposed development responds to the principles as follows:

- **Mixed use:** The proposed development comprises of a mix of uses to include residential, community, retail and commercial floorspace. The community, retail and commercial floorspace elements amount to around 18% of the overall land use.
- **Density:** the proposed development is located on existing and planned high frequency / high capacity public transport corridors. It has been a vacant site for over ten years. It therefore avails of excellent accessibility which justifies a proposed net density of 131.1 uph.
- **Transport:** Reference is made to the TMMP included as part of the Part 8 application. Provision has been made for each mode of transport as part of the development proposals. Bicycle parking is provided in accordance with the relevant standards. Car parking is provided commensurate to the location of the site on high quality public transport corridors.
- **Commercial / Retail:** the commercial and retail space is to be located at the ground floor of the buildings surrounding the new St Pappins Square, others will face the Main Street directly. This will contribute to movement and activity on the square as well as provide natural surveillance.
- **Community and social services:** community space and a creche are provided. A community facility is provided at ground floor level of site 5 to face the Balcurris Road. This is in addition two arts and cultural facilities, one of which is to be located in site 5, beside the community unit and one at ground floor of site 17. Their location will allow to bring interest and natural surveillance on this section of the road.
- **Employment:** The development includes commercial floorspace.
- **Built environment:** the new development will result in the creation of a new high-quality, mixed use urban district arranged around the new St Pappins Square. The square will also act as a linkage between the Ballymun Road and the Balcurris Road. As stated in previous sections of this report, the development includes transitional heights, with the taller buildings located on the frontages and lower buildings toward the low-rise residential units. The development therefore aligns with the existing built form and scale without impacting existing amenities.

### **Strategic Development Regeneration Areas**

The site is located in the Ballymun Strategic Development Regeneration Area (SDRA) 2. The CDP sets out site specific guiding principles for each SDRA, as well as sets out objectives common to all of them. Response to the objectives is provided in the table below.

Objective SDRAO1	Development Response
<p>To support the ongoing redevelopment and regeneration of the SDRA's in accordance with the guiding principles and associated map; the qualitative and quantitative development management standards set out in Chapter 15; and in line with the following overarching principles:</p>	
<p><b>Architectural Design and Urban Design:</b> All development within the SDRA's must be of the highest architectural quality and adhere to the key architectural and urban design principles set out in Chapter 15 in order to create long term, viable and sustainable communities aligned with the principles of the 15- minute city.</p>	<p>The proposal is of high architectural quality and adheres to architectural and urban design principles. It is aligned with the principles of the 15-minute city.</p>
<p><b>Phasing:</b> Large scale development proposals should be developed in accordance with agreed phasing plans to ensure that adequate social and physical infrastructure is delivered in tandem with development.</p>	<p>The proposed development will be developed in one phase.</p>
<p><b>Access and Permeability:</b> Development proposals should ensure adequate permeability and connectivity to surrounding neighbourhoods and public transport infrastructure through the provision of high quality, accessible public realm and high-quality walking and cycling infrastructure. Access and layout should accord with the principles of DMURS.</p>	<p>The development will enable east-west permeability and north-south permeability. It includes a new link street, the Balcurris Road extension and the St Pappin's Square which is a pedestrian and cycle path into the site from the Main Street toward the west.</p> <p>The Balcurris Road extension will allow for access to the Balcurris Garden estate which currently has no direct link to Main Street.</p>
<p><b>Height:</b> Guiding principles regarding height are set out for each SDRA. Where development adjoins lower scaled residential communities, development must be appropriately designed so that no significant adverse impacts on the residential amenities of adjacent residential properties arises. The performance criteria set out in Appendix 3 should be adhered to for developments of significant scale and/or density.</p>	<p>The proposed development has been designed to be cognisant of prevailing heights. Transition in height is provided from the Main Street toward Balcurris Garden Estate. The lowest buildings will be located at the interface with Balcurris Garden estate.</p> <p>Appendix 3 criteria is addressed in the appendix 1 of this report.</p>
<p><b>Urban Greening and Biodiversity:</b> Development proposals within the SDRA must ensure the integration of greening and biodiversity measures including high quality public open space as well as micro greening measures including green walls, green roofs, parklets etc. In general, unless otherwise specified under a separate LAP/SDZ Planning Scheme/other statutory plan policy/objective or site-specific guiding principle, a minimum of 10% public open space should be provided as part of all development</p>	<p>With a provision of 15.95% of the gross site area, the public open space provision is well in excess of the 10% requirement.</p> <p>The proposed landscape design aims to strengthen the value of the site as a place for delivering green/ blue infrastructure whilst protecting and enhancing the natural/built and cultural assets of the site.</p>

Objective SDRAO1	Development Response
<p>proposals in SDRAs. A financial contribution in lieu of same will only be considered in exceptional circumstances.</p>	<p>A Biodiversity Enhancement Plan has been prepared and incorporated within the Landscape Design Report for the proposed development and details how it will support local biodiversity into the future.</p>
<p><b>Surface Water Management:</b> All development proposals should provide for sustainable surface water management including climate change provisions and the installation of sustainable drainage systems (SuDS) in order to reduce surface water runoff and potential flooding. This should be considered in conjunction with open space design and green infrastructure, biodiversity initiatives and nature based solutions. See Appendix 11, 12 and 13 for further detail.</p>	<p>For full details of the proposed water services strategy, please refer to the materials prepared by Malone O'Regan and submitted under separate under cover. Included in the Engineering Report submitted as part of this application, is an Integrated Surface Water Management Plan/Strategy. The Surface Water Management Plan includes nature-based drainage measures such as permeable paving, SuDS tree pits and green/blue roofs, swales, rain gardens, permeable paving, rainwater harvesting and integrated constructed wetlands.</p>
<p><b>Flood Risk:</b> All development proposals within the SDRA's will have regard to restrictions / measures to mitigate identified flood risk outlined in the Strategic Flood Risk Assessment (SFRA) and in particular, Appendices A, B and C including climate change provisions in the SFRA.</p>	<p>The part 8 site is not located in a flood zone A or B. A desktop Flood Risk Assessment was undertaken.</p>
<p><b>River Restoration:</b> Opportunities for enhanced river corridors are applicable to the following Strategic Development and Regeneration Areas (SDRAs) in order to harness significant opportunities for river restoration where feasible: SDRA 1 Clongriffin/Belmayne and Environs; SDRA 3 Finglas Village Environs and Jamestown Lands; SDRA 4 Park West/Cherry Orchard; SDRA 5 Naas Road; SDRA 6 Docklands; SDRA 7 Heuston and Environs; SDRA 9 Emmet Road; SDRA 10 North East Inner City and SDRA 16 Oscar Traynor Road. See Chapter 9, Policy SI12 for further detail.</p>	<p>N/a to the subject development.</p>
<p><b>Sustainable Energy:</b> Climate Action Energy Statements for significant new residential and commercial developments, in Strategic Development and Regeneration Areas (SDRAs), will be required to investigate local heat sources and networks, and, where feasible, to demonstrate that the proposed development will be 'District Heating Enabled' in order to facilitate a connection to an available or developing district heating network. Further specific guidance regarding 'District Heating Enabled' Development is set out in Chapter 15 and should be complied with. Specific guidance is set out regarding SDRA 6 (Docklands) and SDRA 10 (NEIC) where applicants must</p>	<p>Please refer to the accompanying Climate Action Energy Statement.</p>

Objective SDRAO1	Development Response
<p>demonstrate how a proposed development is District Heating Enabled and will connect to the 'Docklands and Poolbeg' DDHS catchment. Guidance is also set out regarding SDRA 7 (Heuston and Environs), SDRA 8 (Grangegorman/Broadstone), SDRA 11 (St. Teresa's Garden and Environs), SDRA 14 (St. James's Healthcare Campus and Environs), SDRA 15 (Liberties and Newmarket Square) where possible connections or interconnections to existing heat networks in the area, to create a district heating 'node' must be investigated.</p>	
<p><b>Climate Change:</b> Proposed developments within the SDRA shall be required to apply innovative approaches to energy efficiency, energy conservation and the use of renewable energy in order to contribute to achieving zero carbon developments.</p>	<p>Please refer to the accompanying Climate Action Energy Statement.</p>
<p><b>Cultural Infrastructure:</b> All new regeneration areas (SDRAs) and large-scale development above 10,000 sq. m. in total area must provide at a minimum 5% community, arts and culture predominantly internal floorspace as part of their development. See Objective CUO25 for further detail.</p>	<p>See response below.</p>

The latter element is largely reprised under CUO25 'SDRA and Large Scale Developments' which elaborates on the requirement as follows:

*'All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area\* must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.*

*\*Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.'*

The proposed development includes 1,058 sqm which is to be split into three units. Two units (378 sqm in site 5 and 433 sqm in site 17) will be for arts and cultural and one (247 sqm in site 5) will be a dedicated community facility. This is in excess of the 1,004.2 sqm. This complies with CUO25. The proposed development is also complemented by additional uses such as a creche and retail and commercial uses.

As stated earlier, the SDRA also sets out the spatial principles for the development and regeneration of Ballymun. These includes, inter alia:

### **Urban Structure:**

- *'To develop the remaining vacant sites in a sustainable manner and to create distinctive urban places through the use of intelligent urban design and good quality materials having regard to the existing palette of materials and finishes in the area.'*
- *'To complete outstanding infrastructure to enhance connectivity both within Ballymun and to the surrounding area, and to service the remaining development sites.'*

### **Height**

As heights had been set out through the individual site briefs of the Ballymun LAP 2017 as extended, the CDP reviewed whether there was scope for additional height in any of the site. The CDP established that with the exception of a few sites, the approach to building height and density, particularly along the Main Street and near to quality public transport will remain appropriate. It sets out key principles:

- *'To provide building heights in keeping with the height guidance set out for each individual site of the Ballymun LAP 2017, as extended.'*
- *'To provide an appropriate urban Main Street context with heights of six storeys (c. 18m) directly to Main Street, with potential for locally higher buildings in the vicinity of the metrolink station. As blocks turn away from the Main Street, opportunities for some additional height may be considered having regard to prevailing context.'*
- *'To allow for the additional locally higher building on the corner of Balbutcher Lane North and the R108.'*

### **Design**

- *'To implement the urban form and design objectives set out in Section 5.5 of the Ballymun LAP 2017, as extended.'*

### **Green Infrastructure**

- *'To provide and maintain landscaped parks, greens and tree lined streets respecting the established public parks principles.'*
- *'To continue to implement the Surface Water Masterplan for Ballymun facilitating development of the vacant sites.'*

The proposed development responds to the principles as follows:

### **Urban Structure:**

- Across the development site as a whole, the layout is arranged a network/hierarchy of public and communal open spaces, which include as the new St Pappin's Square at the interface with Main Street, a new playground and a series of courtyard inside the perimeter blocks formed by the new buildings. The site has been designed to provide interest and scale to the area which was formerly opened and exposed. Details of the proposed palette of materials and finishes can be found in the Architect's Design Statement.
- Site brief no.5 of the LAP requires the provision of a hard standing open space to the south of Santry Cross ('St Pappins Square). The new St Pappins Square is provided in the location indicated by the LAP, that is at the northeastern corner of site 5.

### **Height**

- The proposed heights across the sites are aligned with those set out in the individual site briefs.
  - Height for Site 5 is not numerically defined in the LAP. Instead, the LAP requires that the northern block limits overshadowing and that the block to the rear provides transitional height to the rear. Site 5 ranges from 4 to 5. The 4-storey element is located to the southern end. Height rises to 5-storey at the interface with St Pappin's Square.



- Height for Site 15 is 2-storey high. The proposed development complies with the requirement.
- Height for Site 16 is also 2-storey high. The proposed development complies with the requirement.
- Height for Site 17 ranges from 3 to 6-storey high. Heights on site vary with the taller elements bookending the building. It is proposed that the tallest part of the building, the one facing St Pappins Square and Main Street will be 6-storey high. This aligns with the height recommended in the CDP for buildings facing the Main Street. It will form a focal point when viewed from the Ballymun Road. Further details are provided in Appendix 1 of this report which addressed the performance criteria identified in table 3, appendix 3 of the Dublin CDP 2022-2028 and in the Architect’s Design Statement. The rest of the building is three and four-storey high.
- Height for Site 18 should be in the order of 3/4 to 5 storeys. The southern block will be 4-storey to the south, east and west and 5-storey to the north.

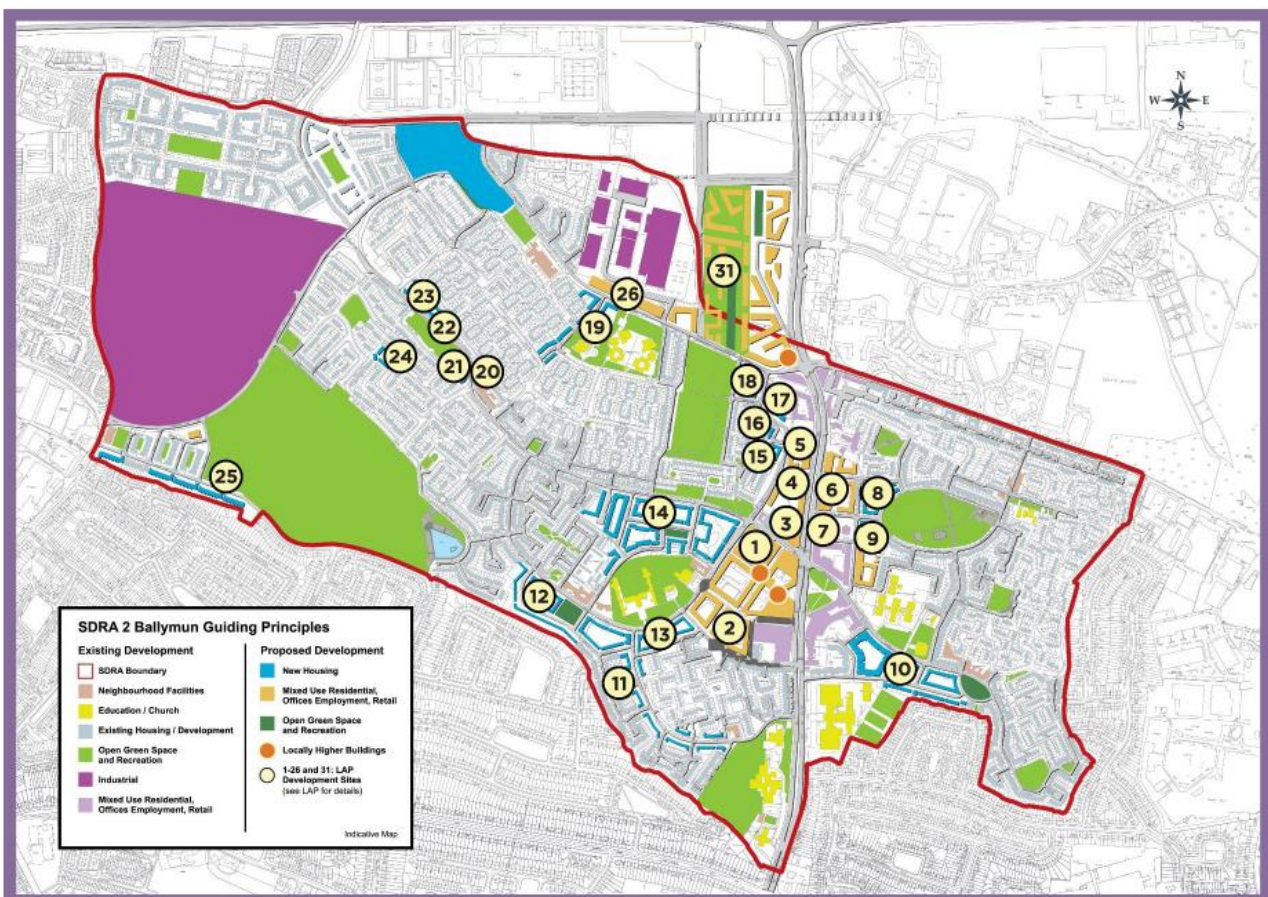
**Design**

- Responses to the urban form and design objectives can be found in the section of this report dealing with the LAP itself.

**Green Infrastructure**

- The proposed development includes a hierarchy of open spaces comprising public plaza, public open space, playgrounds and courtyards which have been designed to the highest standards.
- The relevant requirements of the surface water masterplan for Ballymun have been incorporated into the design.

The figure below shows the guiding principles applicable to SDRA 2.



### **Figure 19: SDRA 2 Ballymun Guiding Principles (Source: DCC)**

The details of the guiding principles are addressed in response to the Ballymun LAP.

#### **Quality Housing and Sustainable Neighbourhoods**

Under QHSN3, the Council seeks to implement its Housing Strategy and Housing Need and Demand Assessment (HNDA) and to encourage the provision of a variety of housing typologies and tenures. The proposed development includes a mix of sizes ranging from the 1-bed to the 4- beds and includes universally designed units.

The Part 8 application also supports the achievement of QHSN9 on active land management. The lands have been vacant since the demolition of the Ballymun flats. With a proposed density of around 131.1 uph, based on a net site of 2.19 ha, the proposal aligns with QHSN10 of the CDP as the development is to be located on an underutilised site and will be of high standards of urban design and architecture.

Under this chapter and specifically QHSN11, the Council promotes the realisation of the 15-min city which *'provides liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible'*. Meanwhile, QHSN12 promotes neighbourhood development.

The proposed development will provide high quality housing for a range of households. It is to be located on a site which is served by and in close proximity of high quality public transport. It is also located adjacent to a supermarket and less than 500 m north of the Ballymun Civic Centre, the Axis Theatre, the Sport Centre and a good range of local facilities, including schools and health services. The site is ideally located to facilitate the 15-min city lifestyle.

Importantly, the development includes 129 one-bed units which can be made available to downsizing households (i.e older person households) so it will make positive contributions to QHSN18 'Needs of an Ageing Population' and QHSN23 'Independent Living'.

Dublin City Council Development Plan (2022-2028) advises that a minimum of 50% of apartments are to exceed minimum area standards by 10%, and that in addition, 50% of apartments that are in excess of minimum size requirements are to be designed to be UD compliant. The UD standards noted are the requirements of the 'Universal Design Guidelines for Homes in Ireland' developed by the Centre for Excellence in Universal Design (National Disability Authority). Details on how these requirements are met can be found in the ADS and the HQA.

The proposed development includes three community spaces, including 1,058 sqm of space located across sites 5 and 17 split into three units. Site 5 consists of 625 sqm of space across two units, unit 1, the community facility comprises 248 sqm of space and unit 2 comprises 378 sqm of arts and cultural space. At site 17, unit 1 comprises 733 sqm of arts and cultural space. Externally, 268 sqm of community, arts and cultural space has been proposed. Its position faces the proposed public open space to form part of site 17 and the Balcurris Road. This indoor/outdoor set up is ideal for community events like community theatre or neighbourhood events.

The spaces provided are adaptable and will be available to residents and non-residents alike. The provision of such space is aligned with policies QHSN47 High Quality Neighbourhood and Community Facilities and QHSN50 Inclusive Social and Community Infrastructure. A social infrastructure audit accompanies this part 8 submission in accordance with QHSN48 Community and Social Audit.

### ***Sustainable Movement and Transport***

Under chapter 8 of the CDP, Policy SMT1 'Modal Shift and Compact Growth' and objective SMT01 'Transition to More Sustainable Travel Modes', the Council promote a shift from the use of private car towards an increased use of more sustainable forms of transport and more active mobility. The proposed development includes for 70 no. car parking space or a ratio of 0.24. It makes generous allocations for cycle parking, including cargo bikes and it is located near a range of buses. The Ballymun MetroLink stop is to be located on the Ballymun Road near its intersection with the Shangan Road, or some 300, south of the site. In addition, planning permission was granted for the Ballymun / Finglas to City Centre BusConnect Scheme. The site therefore avails of high-quality public transport and this is planned to be expanded upon. These schemes are identified as key sustainable projects under SMT22.

The proposed development supports both the policy and the objective.

In accordance with policy SMT4 '*Integration of Public Transport Services and Development*', the proposed development has a net density of 131.1 uph. The retail/commercial uses are to be located the closest to the public transport corridors on Main Street. The site is not of such size that it would make accessibility to public transport difficult.

High quality public realm proposals are catered for as part of the development in accordance with SMT9. The proposed development includes a hierarchy of open spaces to include the new St Pappins Plaza, the central park between sites 15-16 and 5 and the courtyards/gardens which will serve the blocks themselves. Please refer to landscape drawing by Mitchells.

Importantly, the proposed development will provide enhanced connectivity. At present, east-west connectivity is very basic and comprises of a tarmacked footpath going from the Main Street into two directions (south of Balcurris Road and north of Balcurris Road/toward Balcurris Gardens). The proposals will result in well overlooked, formally landscaped streets which will improve the sense of safety of users. There will be two new formal links, one specifically for pedestrians and cyclists via St Pappin' Square and one for all users via the new Balcurris Road extension.

Under SMT010 'Walking and Cycling Audits', the suite of documentation prepared for this part 8 application includes a walking and cycling audit contained in the accompanying Traffic Mobility Management Plan prepared by Malone O'Regan.

SMT27 'Car Parking in Residential and Mixed-Use Developments' promotes sustainable car parking with a view to promote city living and reduced car parking standards. The proposed development includes a 70 no. spaces within the site.

### ***Green Infrastructure and Recreation***

## Planning Statement

A number of policy objectives relate to green infrastructure. In particular, it requires under GI4 'Accessibility', that all green infrastructure elements should be universally accessible and that new developments should include green infrastructure and an ecosystem services approach (GI6 'New Development / New Growth Areas'). All areas of open space will be universally accessible and will incorporate blue and green roofs, as well high quality landscape features which together will support mitigation and adaptation to climate change.

Children playing facilities are provided in accordance with GI51 and GI52.

### Development Management Standards

The development management standards are contained in the Chapter 15 of the Dublin City Development Plan 2022-2028.

Table 15-1 of the CDP shows the suite of documents required to accompany applications for development.

**Table 7: Planning Application Documentation**

Reports	Threshold	Application Reference
Architectural Design Report	50 or more residential units	See Architect Design Statement
Housing Quality Assessment	All residential development	See HQA
Landscape Design Report	30 or more residential units	See Landscape Design Report
Planning Report	30 or more residential units	This report
Daylight and Sunlight Assessment	All apartment developments	Daylight and Sunlight Assessment of a Proposed Development
Community and Social Audit	50 or more residential units Any development comprising of community or social infrastructure	Social Infrastructure Audit
Lifecycle Report	All apartment developments	Building Lifecycle Report
Community Safety Strategy	100 residential units	See Architect Design Statement
Operational Management Statement	30 or more residential units	See Operational Management Plan
Traffic and Transport Assessment	50 or more residential units	Traffic Mobility Management Plan
Mobility Management Plan / Travel Plan	20 or more residential units Any development with zero/reduced car parking.	Traffic Mobility Management Plan
Site Specific Flood Risk Assessment	Any developments within a flood zone a and b	Desktop Flood Risk Assessment
<b>Site Investigation Report</b>	All developments on site that comprise of contaminated lands and/or where basement is proposed.	Site Investigation Report
Conservation report		n/a
Retail Impact Assessment		n/a
Ecological Impact Assessment	All developments that are located within or adjacent to any sensitive	Preliminary Ecological Appraisal

Reports	Threshold	Application Reference
	habitat, on sites that could contain protected species or in a quality landscape environment.	
Appropriate Assessment Screening and NIS	An Appropriate Assessment Screening is required for all developments. A stage 2 (Natura Impact Statement) is required where significant effects on the environment are likely either alone or in combination with any other project.	Appropriate Assessment Screening Report. NIS not required.
Environmental Impact Assessment	All developments within the threshold set out in Planning and Development Act 2000, as amended or any development that has a significant impact on the environment.	EIA Screening Report.
Landscape and Visual Impact Assessment, Microclimate Assessment, Telecommunications Report – see Appendix 3	Site specific circumstances	Wind Microclimate Modelling

### Brownfield Sites

The table below summarises the considerations as they relate to brownfield sites.

Consideration	Development Response
To encourage innovative, high quality urban design and architectural detail in all new development proposals	Please refer to the Architect Design Statement
To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.	
To respect and enhance existing natural features of interest.	The site slopes slightly from the northwest corner toward the south-southeast. The most important aspect is its transitional location between the higher builder frontages of Main Street and the low-rise residential units of Balcurris Gardens. The proposed layout and design incorporate transitional heights which allow for the development to blend with the surrounding area.
To contribute to the streetscape creating active and vibrant public realm.	The proposed development will make positive contribution to the public realm. It includes the new St Pappin’s Square which is proposed to complete the vista toward St Pappin’s Church of two Protected Structures in Ballymun. Retail/commercial uses are
To create animation and create activity at street level and vertically throughout the building.	



Consideration	Development Response
	<p>proposed around the Square to create activity and vibrancy.</p> <p>The community units are more inward facing to the site along the Balcurris Road. These will front the internal road network providing activity at street level and natural surveillance.</p> <p>Together the community and commercial/retail uses will allow for the provision of vertical animation and activity owing to the mixed-use approach to the development. The ground floors of sites 5 and 17 are all dedicated to non-residential uses with upper floors to be used for residential purposes.</p>
<p>To provide for appropriate materials and finishes in the context of the surrounding buildings.</p>	<p>Please refer to the Architect Design Statement</p>
<p>To ensure land contamination is appropriately dealt with and mitigated against.</p>	<p>The site is not contaminated. A site investigation report was prepared to confirm this.</p>
<p>To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network.</p>	<p>Please refer to the Architect Design Statement</p>
<p>To create new compositions and points of interest.</p>	<p>The proposed St Pappin’s Square will provide a vista across to St Pappin’s Church, which is one of the only two historic and protection buildings in Ballymun.</p>
<p>To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community- and/or employment generating uses to improve the existing range of uses and facilities in the area</p>	<p>The proposed development includes:</p> <ul style="list-style-type: none"> <li>• 288 residential units,</li> <li>• A creche</li> <li>• one no. community space and two arts and culture space</li> <li>• 1,611 sqm of commercial/retail space across sites 5 and 17.</li> </ul> <p>The development complies as it provides a range of uses.</p>
<p>To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site.</p>	<p>The site consists of amenity grassland and does not include specific landscape or ecological features owing to its nature as a vacant site. Please refer to the landscape plans for details of landscape proposals.</p>
<p>To prioritise pedestrian and cycle movements in connection with public transport infrastructure.</p>	<p>There is a strong focus on pedestrian and cycle movement as part of the site layout. An East-West cycle corridor between the Ballymun Road and Balcurris Park is proposed.</p>
<p>To retain existing and create new features to make an easily navigational urban environment, including</p>	<p>The proposed development will create a strong frontage on the Ballymun Road. The aspect of the</p>

Consideration	Development Response
active building frontages with clearly defined edges and safe public routes	road is currently poor with no cohesion on its entire length. The site has significant frontage along the Ballymun Road but remained undeveloped for many years. This has given an incomplete outlook to the road. This development will also provide the new St Pappins Square which will have the St Pappins Church located to the east of the Ballymun Road as a vista.
To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks.	Please refer to section 9 recommendations of the accompanying Climate Action, Sustainability and Part L Compliance Report
Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood.	Waste management has been duly considered. There is adequate waste storage to service the development and visibility splay for refuse trucks have been prepared.

### Green Infrastructure and Landscaping

The CDP requires that planning applications address climate action as part of the overall design and incorporate green infrastructure techniques. In addition to the retention of existing natural features, the development should include:

Standard	Development Response
Analysis of the potential for the retention and integration of existing natural features, such as watercourses, mature planting and topography; this approach, in accordance with the National Landscape Strategy 2015–2025, ensures the landscape character of the area is retained and informs the proposed design.	There is limited landscaping and natural features on site given its nature as a vacant site. The proposed development is cognisant of the topography of the site which drops slightly in a west-east manner.
The connectivity of proposed open spaces to adjoining existing open space or natural assets should also be considered with reference to the city’s green infrastructure in this development plan (Chapter 10) and any relevant local area plan(s); for sites which provide or adjoin habitats for species designated under the European Union Habitats Directive, Article 10 of the directive shall apply in regard to the need to provide connectivity and ‘stepping stones’ to ensure biodiversity protection. (see also G17 ‘Connecting Greening Elements in Site Design’)	<p>The site adjacent to Balcurris Park. At its interface with the park, the site is zoned Z9 ‘Open Space’. It is therefore proposed to include a landscaped corridor on this interface to link directly with the park.</p> <p>Internally to the site, a necklace of open spaces is provided throughout the site to conclude at the new St Pappins Square.</p>

Standard	Development Response
Potential applicants should refer to the Dublin City Biodiversity Action Plan 2021 – 2025 or subsequent plans and consult the City Council’s Parks, Biodiversity and Landscape Services Division to ascertain the significance of any ecologically sensitive areas which it may be appropriate to retain or integrate into a landscape plan. In such cases, the ecological attributes of the site and the impact of any development should be considered prior to final design.	The site comprises amenity grasslands. As a result of development, the overall ecological quality will be improved owing to the landscape proposals.

**Surface Water Management and SuDS**

Standard	Development Response
All new developments will be required to prepare a Surface Water Management Plan in accordance with the requirements of the Council’s Surface Water Management Guidance.	A Surface Water Management Plan for the Development is incorporated into Malone O’Regan Engineering Report.
SuDS measures shall be set out clearly in an assessment of the drainage details prepared by a qualified Engineer	Please refer to the Engineering Report prepared by Malone O’Regan which provides a comprehensive overview of the SuDS measures proposed at the site.  Proposed SuDS measures include permeable paving, green roofs, rain gardens and planted detention basins.

**Green/Blue Roof**

Consideration	Development Response
All new development projects over 100 sq. metres to provide green roofs to assist in climate action and urban drainage in accordance with Policy SI23	Green roofs will be installed. These roofs will provide initial storage of rainwater, while also reducing the rate at which rainwater from heavier rainfall events discharges to the attenuation systems. They can also help to filter the run-off, removing pollutants and resulting in a higher quality of water discharging into the drainage system and receiving watercourse.

**Urban Greening**

Consideration	Development Response
All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc.	Please refer to landscape drawings prepared by Mitchells.

**Landscape Plans and Design Reports**

Consideration	Development Response
Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report.	A Landscape Design Report prepared by Mitchell Associates accompanies this application.
Boundary Development Standards treatments and public realm improvements should also be illustrated within landscape plans	Please refer to architect’s drawing 1013 showing the proposed boundary treatment.
A tree survey must be submitted where there are trees within a proposed planning application site.	No tree survey is required as there are no trees on site.

**Public Open Space and Recreation**

Standard	Development Response
The design and layout of the open space should complement the layout of the surrounding built environment and complement the site layout.	<p>The development proposal includes the new St Pappin’s Plaza. This plaza will have for vista the old St Pappin’s Church located east of the Ballymun Road. It will be well overlooked by the commercial/retail units at ground floor.</p> <p>Centrally located to the site is another area of open space which includes a playground. Again this will be well overlooked by the residential units located on its east, south, west and north.</p> <p>The rear of site 17 is a courtyard which allows for a better interface between the block proposed on the site and the rear of Linbhla.</p> <p>As stated above, the site includes some Z9 zoned lands to the north west at the interface with Balcurris Park. A linear landscape path is proposed at the location to reinforce the connectivity with the park.</p>
Open space should be overlooked and designed to ensure passive surveillance is achieved	The architects drawings show how all areas of open space are overlooked and designed to ensure passive surveillance.
The space should be visible from and accessible to the maximum number of users.	
Inaccessible or narrow unusable spaces will not be accepted.	No inaccessible or unusable spaces are proposed.
The level of daylight and sunlight received within the space shall be in accordance with the BRE Guidelines or any other supplementary guidance document – see Appendix 16	Please refer to the Daylight and Sunlight assessment.

## Planning Statement

Standard	Development Response
Any new public open space on the site should be contiguous to existing open space or natural feature (i.e. river corridors and canal bank) to encourage visual continuity and optimise value of ecological networks.	As stated above, the site includes some Z9 zoned lands to the north-west at the interface with Balcurris Park. A linear landscape path is proposed at the location to reinforce the connectivity with the park
Protect and incorporate existing trees that are worthy of retention into the design of new open spaces.	There are limited natural features on the site. Connectivity with Balcurris Park is proposed.
Retain and incorporate other existing natural features into the design to reinforce local identity, landscape character, and amenity.	
Landscaping works should be integrated with overall surface water management and SuDS strategy such that landscaping plans may include associated biodiversity areas or wetlands which can reduce / better manage surface water run-off.	A coordinated approach within the landscape design has been taken for water management, with the provision of permeable surfaces and build-ups throughout the scheme.
Landscaping schemes should provide a hierarchy of different types of planting throughout the development in order to give visual variety. Permeable surfaces will be encouraged (see Appendix 12).	Please refer to landscape drawings. A hierarchy of spaces is provided with public and communal open spaces and private open space.
Materials must be appropriate, durable and of a good quality. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design.	Please refer to the Architect's Design Statement.
Street furniture should be sited such that it does not provide an obstacle for people with disabilities and should be designed so that it is fully accessible where feasible.	Please refer to landscape drawings and the accompanying Landscape Report which includes details on the proposed street furniture.
Age friendly measures should be incorporated into the design.	All areas are accessible to all regardless of abilities.
Permeability and accessibility for all users, particularly disabled persons should be provided	Please refer to the Architect's Design Statement.
Cycle and pedestrian friendly routes should be accommodated.	Pedestrian and cycle movements are prioritised over car movements throughout the site.

## Boundary Treatments

Standard	Development Response
Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application.	Please refer to architect's drawings.

## Public Open Space



Standard	Development Response
10% is required in Z1 and Z4 zonings.	The provision of public open space totals 4,267 sqm or 15.95% of the gross site area. This includes the Z9 zoned lands to the west of site 18.

### Play Infrastructure

Standard	Development Response
In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition.	As described in the section addressing the Apartment Design Guidelines, the development includes play areas for both younger and older children. Please refer to the landscape drawings.

### Apartment Standards

Standard	Development Response
<p><b>Unit Mix</b></p> <p>Specific Planning Policy Requirement 1 states that housing developments may include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.</p> <p>Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Housing &amp; Community Services Department.</p>	This part 8 proposal was formulated jointly with the DCC Housing Department. It includes 48.8% of one-bed units, 30.7 % of two-bed units and 21.5 % of three-bed units.
<p><b>Unit Size / Layout</b></p> <p>Specific Planning Policy Requirement 3 sets out the minimum floor areas for apartments</p>	Please refer to the section of this report on the apartment guidelines.
<p><b>Dual Aspect</b></p> <p>Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate</p>	163 of the apartment units are dual aspects. This equates to 57.6% of the proposed units.
<p><b>Floor to Ceiling Height</b></p>	Please refer to the section of this report on the apartment guidelines.

Standard	Development Response
<p>A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided</p>	
<p><b>Lift, Stair Cores and Entrance Lobbies</b> a maximum of 12 apartment per core may be provided</p>	<p>Please refer to the section of this report on the apartment guidelines.</p>
<p><b>Internal Storage</b> Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments</p>	<p>Please refer to the section of this report on the apartment guidelines.</p>
<p><b>Private Amenity Space</b> Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details. At ground floor level, private amenity space should be sufficiently screened to provide for privacy. Where ground floor apartments are to be located adjoining the back of a public footpath or other public area, consideration may be given to the provision of a 'privacy strip' of approximately 1.5 m in depth, subject to appropriate landscape design and boundary treatment.</p>	<p>Please refer to the section of this report on the apartment guidelines.</p> <p>Please refer to architect's drawings for privacy strip at ground floor.</p>
<p><b>Communal Amenity Space</b> All new apartment developments are required to provide for communal amenity space externally within a scheme for the use by residents only. Communal open space provision is in addition to any private or public open space requirements. Communal amenity spaces may comprise of courtyard spaces and linear open spaces adjacent to the development. The minimum areas for private amenity are set out in Appendix 1 and Section 4.10 to 4.12 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</p>	<p>Please refer to the section of this report on the apartment guidelines.</p>
<p><b>Internal Communal Facilities</b> Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for use by residents.</p>	<p>One community space and two arts and culture units are provided.</p>
<p><b>Security</b></p>	<p>Please refer to the Architect's Design Statement.</p>

Standard	Development Response
<p>New apartment developments should incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas.</p>	
<p><b>Access and Services</b> Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly.</p>	<p>All pedestrian and vehicular access points are clearly defined and overlooked by the blocks and have been designed to suit all users, regardless of their abilities.</p>
<p><b>Refuse Storage</b> Refuse storage and collection facilities should be provided in all apartment schemes.  All applications for 30 or more apartments should be accompanied by an Operational Waste Management Plan.</p>	<p>Refuse storage is provided for each of the blocks. Please refer to architect's drawings.  An Operational Waste Management Plan accompanies this part 8 application.</p>
<p><b>Lifecycle Reports</b> All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme.</p>	<p>A Lifecycle Report accompanies this application.</p>
<p><b>Operational Management and Maintenance</b> All apartment developments will be required to address the maintenance and management of a development to clarify the overall operational management plan for the development together with the maintenance strategy for the upkeep of the building.</p>	<p>A building lifecycle report accompanies this application.</p>
<p><b>Microclimate – daylight and sunlight, wind and noise</b> All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind</p>	<p>Previous sections of this report discuss these reports where appropriate, specifically the apartment guidelines section.</p>
<p><b>Daylight and Sunlight</b> A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme.</p>	<p>A daylight and sunlight assessment accompanies this part 8 application.</p>
<p><b>Separation Distance</b> Traditionally a minimum distance of 22m is required between opposing first floor windows.</p>	<p>The proposed separation distance complies with this requirement.</p>

*Standards as Derived from the Appendices*

A number of standards are derived from the appendices of the CDP.

Standard	Development Response
<p><b>Density Ranges</b> SDRA: 100-250 uph</p>	<p>The proposed development has a density of 131.1 uph and therefore is well within the range of the CDP for SDRA.</p>
<p><b>Plot ratio and coverage:</b> The site is located within a regeneration area, therefore the following requirements are applicable: Indicative plot ratio – 1.5-3.0 Indicative Site Coverage – 50-60%</p>	<p>The proposed plot ratio is 0.92.</p> <p>The proposed site coverage is 34.02%.</p> <p>The Development plan notes that the applicable site coverage percentages are indicative rather than fixed. The proposed development will deliver a high-quality residential development with a significant quantum of public open space that will serve the perspective residents of the scheme and the wider area. It is therefore considered that the proposed site coverage and plot ratio is considered appropriate.</p>
<p><b>Bicycle Parking Standards</b> Table 1 of appendix 5 sets out parking standards: <b>Residential apartments:</b> 1 long-stay space per bedroom and 1 short-stay space per two apartments. <b>Residential Dwelling:</b> 1 long-stay space per unit and 1 short-stay space per 5 dwellings. <b>Childcare:</b> 1 long stay per 5 staff and 1 short stay per 10 children. <b>Retail:</b> 1 long stay per 5 staff and 1 per 100 sqm GFA <b>Community:</b> 1 long stay per 5 staff and 1 per 100 sqm GFA</p>	<p>Overall, 516 long term bicycle parking space and 35 cargo spaces are provided for residents across the site. 180 spaces will be provided for visitors.</p> <p>For the other uses, 91 are provided to serve the retail and commercial units, the creche and the community / arts and culture.</p> <p>The breakdown per site can be found in the HQA and the location of the parking can be seen on the architect’s plan.</p>
<p><b>Car Parking Standards</b> The site falls under Zone 2 – key transport corridor</p> <ul style="list-style-type: none"> <li>• 1 per 2 dwellings</li> <li>• Community 1 per 275 sqm GFA</li> <li>• Childcare 1 per 100 sqm GFA</li> <li>• Retail: 1 per 100 sqm GFA</li> </ul>	<p>The proposed car parking provision at the site includes 70 no. spaces for a parking ratio of 0.24.</p>
<p><b>Electric Vehicles</b> All new developments must be futureproofed to include EV charging points and infrastructure. In all new developments, a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces shall be</p>	<p>In accordance with the development plan, 50% of spaces will have EV chargers installed and ducting has been proposed for all carpark spaces for future EV charging connections.</p>

Standard	Development Response
<p>designed to facilitate the relevant infrastructure to accommodate future EV charging. Space for EV charging infrastructure shall be clearly detailed in planning applications.</p>	
<p><b>Motorcycle Parking</b> New developments shall include provision for motorcycle parking in designated, signposted areas at a rate of 5% of the number of car parking spaces provided</p>	<p>Please refer to the accompanying Architecture drawings,</p>
<p><b>Waste Storage Facilities</b></p> <ul style="list-style-type: none"> <li>• Receptacles that are designed for reuse, with the exception of a specific area designated by a local authority as being only suitable for the collection of nonreusable receptacles such as bags, ideally of 1,100 litre capacity, must be used.</li> <li>• To provide a three-bin collection system for residents in communal collection schemes, for each type of waste: general (residual) waste, dry mixed recyclables and organic waste. A proposal on the three-bin system including bin quantity, type and frequency of collection must be submitted in writing to the Waste Regulation Unit in Dublin City Council for agreement. Sufficient space must be provided to accommodate the collection of dry mixed recyclables and organic waste.</li> <li>• Suitable wastewater drainage points should be installed in the receptacle bin storage area for cleaning and disinfecting purposes.</li> </ul>	<p>Please refer to drawings prepared by MCORM which illustrates the location of dedicated waste storage facilities at ground floor. An Operational Waste Management Plan has been prepared by Traynor Environmental and accompanies this application.</p>
<p><b>Green and Blue Roof</b> Planning applications which include roof areas of greater than 100 square metres with flat and gently sloped roofs are considered appropriate for green blue roof application. The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.  Minimum coverage for an extensive green roof is 70% Minimum coverage for an intensive green roof is 50%.</p>	<p>Please refer to Engineering Report prepared by Malone O'Regan and the accompanying roof plan drawings prepared by MCORM.</p>

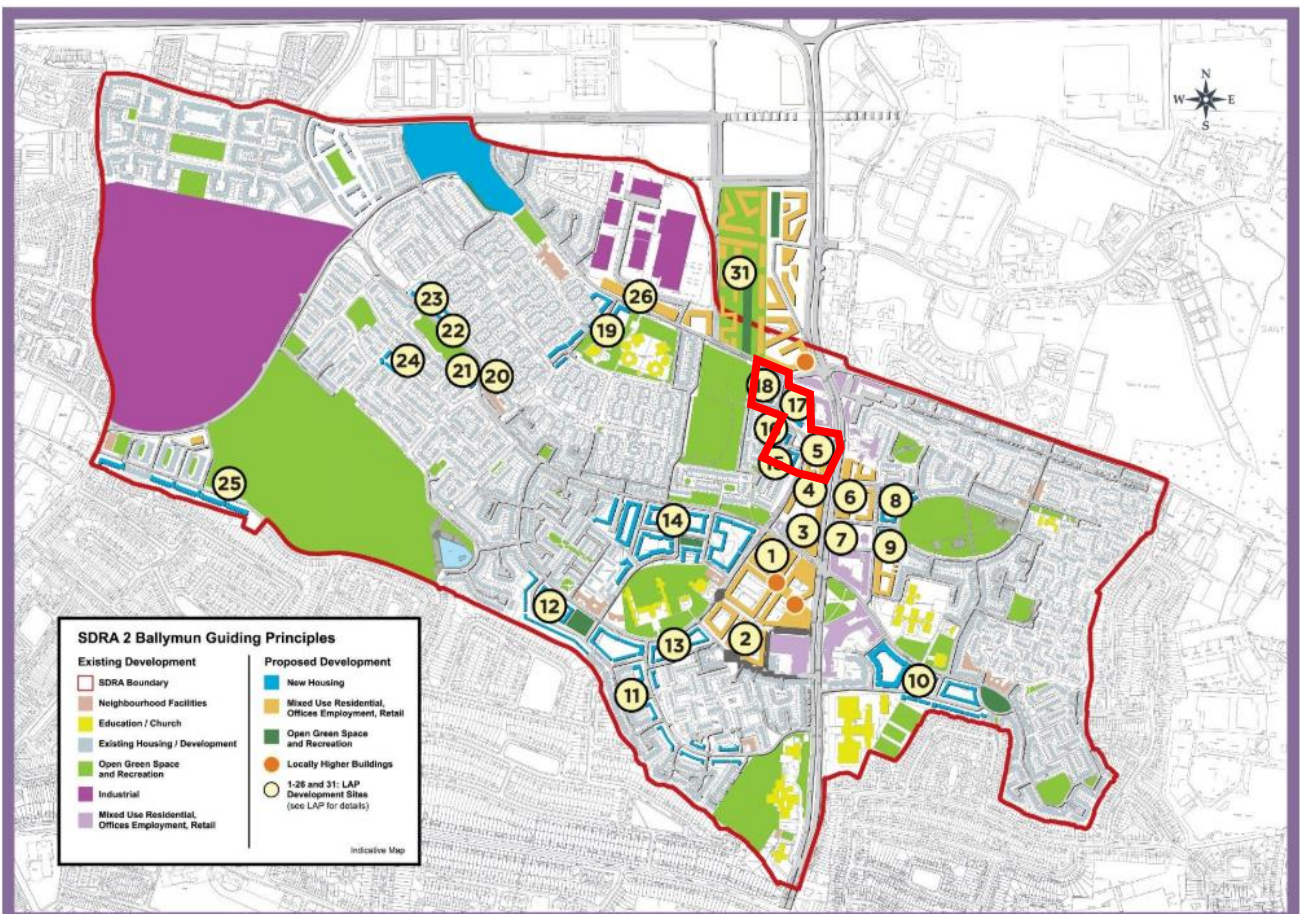


Standard	Development Response
<p><b>SuDS Requirements</b></p> <p>SuDS requirement 1 – runoff destination                      SuDS requirement 2 – hydraulic control                      SuDS Requirement 3 – Water Quality                      SuDS Requirement 4 – Amenity                      SuDS Requirement 5 - Biodiversity</p>	<p>Please refer to the accompanying Engineering Report prepared by Malone O'Regan for details of the proposed SuDS measures.</p>
<p><b>Surface Water Management Planning</b></p> <p>Development including or in excess of 2 no. residential units or 100 sq. m. of non-residential uses (including social and community uses)</p> <p>All developments with surface water implications which fall within these thresholds will be required to prepare a SWMP as part of their project design process.</p>	<p>Please refer to the Engineering Report prepared by Malone O'Regan which details the surface water management proposed as part of the project.</p>

7.4.2 Ballymun Local Area Plan 2017 as extended

7.4.2.1 Overview

The Ballymun Local Area Plan (LAP) 2017, as extended, is the applicable plan. It particularly guides the form of the development to be delivered in Ballymun. The LAP has the same boundaries as the SDRA 2 described in preceding sections.



**Figure 20: Ballymun SDRA with the site outlined in red (Source: DCC)**

The LAP has divided the part 8 site into five development sites.

### 7.4.2.2 Vision and Key Principles

The LAP contains a series of key principles setting the strategy for the development of Ballymun. Of particular relevance are the following:

- *KP1: 'To develop the remaining vacant sites in a sustainable manner'.*
- *KP2: 'To develop the remaining residential sites for a mix of house types and tenures to increase the population and support the existing services and businesses in the area'.*
- *KP4: 'To create distinctive urban places through the use of intelligent urban design and good quality materials having regard to the existing palette of materials and finishes in the area.'*
- *KP9: 'To provide and maintain landscape parks, greens and tree lined streets respecting the established public realm principles'.*
- *KP10: 'To continue to implement the Surface Water Masterplan for Ballymun facilitating development of the vacant sites'.*

The proposed development has been vacant since the demolition of the flats over ten years ago. It will be developed to include a mix of houses and apartments, some of the apartments are own-door. The provision of the new St Pappin's Square will make positive contributions to the public realm of Ballymun. The layout is reflective of the principles set out in the LAP as discussed in sections below. Materials and design choices have been selected to respond to the prevalent streetscape in the area.

### 7.4.2.3 LAP Development Strategy

The LAP also contains objectives governing the build out of the remaining sites in Ballymun. The following objectives apply:

- *LU1 'Develop the remaining vacant sites in Ballymun in accordance with this LAP'.*

As stated above, the site has been vacant for over ten years. In this regard the development supports this objective.

- *EO1 'Complete the redevelopment of the Ballymun Main Street, including the shopping centre site, and attract new employment generating uses'*

The development includes site 5 which has a long frontage onto Main Street. All uses proposed at ground floor along Main Street are retail/commercial uses. The development will make positive contributions toward the achievement of this objective.

- *EO4: Provide for additional office space along the Main Street*
- *EO5: Provide for additional retail space along Main Street*
- *EO6: Support the provision of local retail needs within the neighbourhood centres*

The achievement of these three objectives is supported by the proposed provision at ground floor on the interface with Main Street and with St Pappins Plaza of retail/commercial space. At this point in time, the final

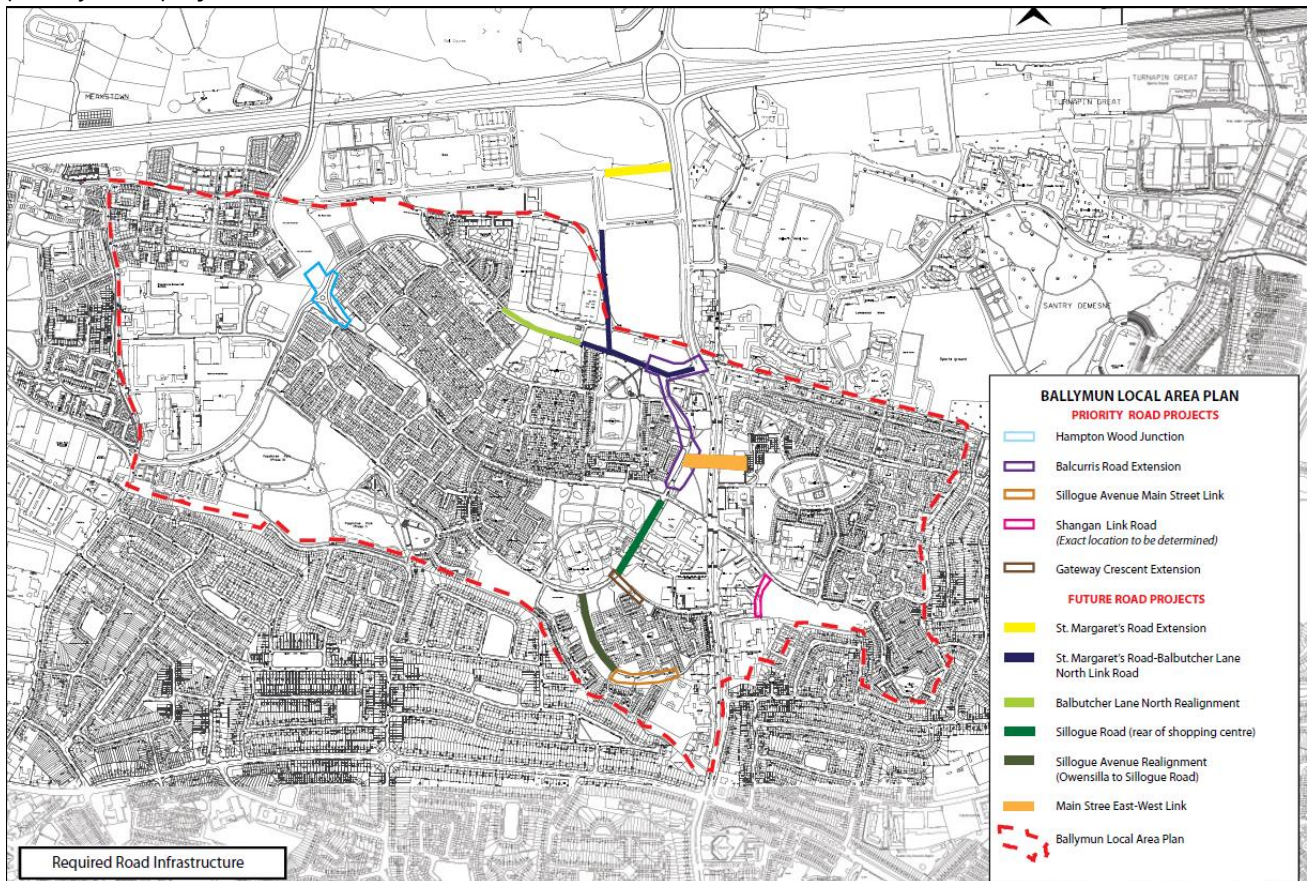


use is undetermined. The spaces have been designed to accommodate either/or. Given the size of the units, it is expected that any retail units proposed would serve local needs.

- *EO8: Improve the housing tenure mix in the area*

Reference is made to the Social Housing Need and Justification Report which review housing tenure in the area.

The LAP also includes movement objectives which aim is to improve permeability and connectivity around Ballymun. The LAP requires the development of the Balcurriss Road Extension which is a parallel route to Main Street. It provides an alternative route between Main Street and Balbutcher Lane. This will provide greater permeability and connectivity to the neighbourhoods of Sillogue and Balcurriss. The figure below shows the priority road projects identified in the LAP.



**Figure 21: Required Road Infrastructure in the Ballymun LAP (Source: DCC)**

The proposed development will allow for the completion of the road network at this location in accordance with MO1. The Balcurriss Road will connect the Balbutcher Road to the Main Street.

The development prioritises cycle and pedestrian movements as required under MO5.

#### 7.4.2.4 Design Principles

The LAP considers a number of design principles for Ballymun which underpin the urban form and design objectives of the LAP, specifically UD2 'implement the urban form and design objectives set out in detail within section 5.5.2 of the LAP.' The objectives are presented in the table below.

**Table 8: Design Principles as extracted from section 5.5.2 of the LAP**

Area Wide Objectives	Development Response
<i>'Create 'places' rather than 'spaces''</i>	The proposed development focuses on the creation of place. All units directly front existing and proposed streets to create scale and provide a human feel to the new area. It includes an open space to be located to its east which will act a focal point between existing and proposed residential areas.
<i>'Make distinctive neighbourhoods'</i>	The proposed development was designed to enhance the Main Street and Balbutcher Lane frontages. It incorporates transitional heights to blend in with the surrounding area. In addition, the development provides for the new St Pappins Square, which has for vista the old St Pappins Church located across the road.
<i>'Nurture a variety of design responses rather than uniformity and require high quality'</i>	Please refer to section 6.3 of the ADS which details materials and finishes.
<i>'Ensure variety, innovation and character for residential sites'</i>	Please refer to the ADS.
<i>'The delivery of high density development in and around Main Street, reducing towards the neighbourhoods. The appropriate density is c. 150 units per hectare along Main Street, reducing to c. 50 units per hectare in the neighbourhood centres and lower when required to address site constraints. The attainment of density is not a standalone objective; rather it should be delivered in tandem with quality to ensure the creation of good urban places.'</i>	The proposed development has a net density of 131.1 uph.  Density generally decreases across the site away from Main Street.
<i>'To respect the hierarchy of scale already in place – i.e from urban street to suburban street and neighbourhood green / space. Heights of 4-6 storeys will be sought along Main Street, stepping down to 2-4 storey in the residential neighbourhoods, and taking into account heights of adjoining properties.'</i>	The hierarchy of scale is respected. Height along Main Street is 4 to 6 storey. Site 17 includes a 6-storey element which will directly face St Pappin's Square. Height has been considered to allow for transition from the Main Street toward Balcurriss Garden.
<i>'To provide residential development that is street-oriented, creating a sense of place, safety and enclosure.'</i>	The design was focused on the creation of streets rather than the creation of roads.  All parts of the public realm, including streets is well overlooked.  All new streets proposed provide for a sense of enclosure and safety with no long stretches of road or blank wall gables proposed.
<i>'All open spaces should be overlooked so they provide safe places to walk, play and sit.'</i>	All areas of open space are well overlooked.
<i>'To maintain the principles of passive supervision and turning corners in building design. This is required to avoid the creation of blank gables, unallocated space and areas / features which conducive of anti-social behaviour.'</i>	No blank gables are proposed as part of the development. All parts of the development, streets included will be well overlooked.  All part of the public realm is overlooked.

Area Wide Objectives	Development Response
'No left-over space should be permitted within new developments.'	No left-over space is left.
'To provide a clear delineation between public and private space.'	To ensure a clear delineation of public and private space, private curtilage is provided for units with ground floor access. This allows for units to be set back from the street, ensuring the privacy of occupants.
'Overhangs should be avoided'.	No overhang is proposed.

#### 7.4.2.5 Housing and Tenure

Under HO2 it is an objective of the LAP to '*ensure future housing development helps to create a good tenure mix locally and provide various housing types and typologies to meet the needs of all sectors of society*'.

The proposed mix includes:

- 98% are apartments, of which 3.4% are own-door units. Of the apartment units:
  - 48.8% are one-bed;
  - 30.7% are two-bed;
  - 20.5% are three-bed.
- The rest of the units comprises 3 and 4-bed houses.
- 25% of the units are designed to universal standard.

Please refer to the Social Housing Need and Justification Report which considers the housing tenure in the area.

The proposed development contributes to the diversification of tenures, types and typologies in Ballymun.

#### 7.4.2.6 Green Infrastructure and Biodiversity

In accordance with objective GI2, all new streets proposed as part of the scheme will be tree-lined and appropriately landscaped as seen on landscape drawings by Mitchell.

#### 7.4.2.7 Drainage and Water Objectives

The LAP contains objectives relating to drainage and water. In particular, under DW1, it seeks to '*continue to implement the Ballymun Surface Water Masterplan including the provision necessary upgrading works to the surface water network within the 1960s housing areas of Sillogue Gardens and Coultry Gardens*'.

Adequate SuDS are provided across the site in accordance with DW3.

#### 7.4.2.8 Site Briefs

As stated in earlier sections of this report, the part 8 site comprised five development sites which have been identified in the LAP. The LAP provides site briefs for redevelopment sites to guide their spatial structure. Site briefs 5, 15, 16, 17 and 18 are relevant to this part 8. These are presented below.

Site 5 – Main Street site to south of Santry Close

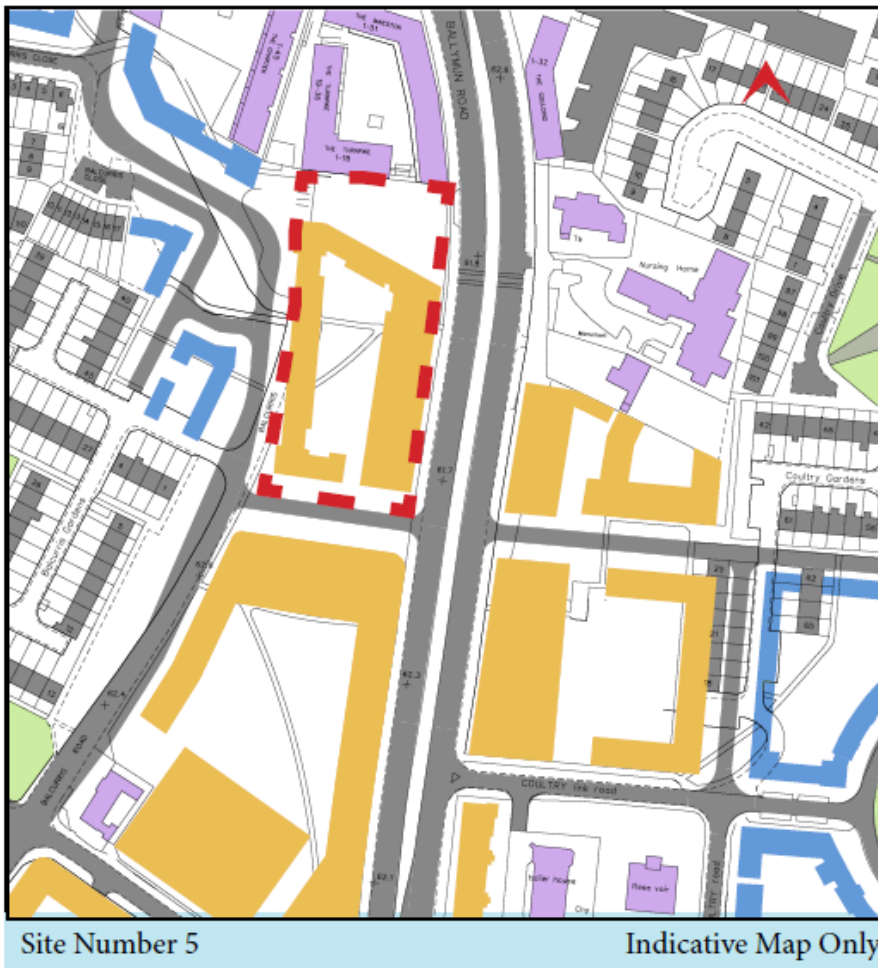


Figure 22: Site Brief no. 5 (Source: DCC)

The site brief is accompanied by the following requirements.

Table 9: Design Requirements for Site 5

Area Wide Objectives	Development Response
<p><b>Height:</b> New development should provide an appropriate urban Main Street context with parapet height of c. 18m directly to Main Street</p>	<p>The proposed development provides a strong urban frontage onto Main Street. Parapet height is not more than 18m.</p>
<p><b>Estimated Capacity:</b> c. 16,000 sqm of mixed-use dependent on design and mix of uses</p>	<p>The proposed development 14,099.4 sqm. Given that it provides for adequate density and meets the other design criteria and applies the relevant development</p>



Area Wide Objectives	Development Response
	management standards, it is considered that the provision of 14,099.4 sqm to include residential, community, childcare and commercial/retail is appropriate.
<b>Supporting information / requirement:</b> provide a hard standing open space to the south of Santry Cross to be known as St Pappins Square.	An area of hard standing is provided to the south of Santry Cross. This will be St Pappins Square.
Provide continuous frontage and a sense of street enclosure to Main Street.	Continuous frontage is provided on Main Street. This will contribute to the creation of a sense of street enclosure along the road.
Blocks should turn corners.	All blocks turn corner. All units provide natural surveillance on all parts of the public realm.
Northern block to minimise overshadowing of St Pappins Square and protect residential amenity of southern block of Santry Cross.	A Daylight and Sunlight assessment has been carried. It shows that the development will minimise overshadowing of St Pappins Square and protect residential amenity of the southern block of Santry Cross.
Block to the rear must mark the transition to the suburban two storey housing.	There is sufficient separation distance with the rear site so there is no impact from site 5 onto sites 15 and 16.
Development of the site linked to the delivery of Balcurris Road Extension, which may impact the height and density that the site can deliver.	The development includes the extension and realignment of the Balcurris Road.
Sufficient space to be provided between site 4 and site 5 to provide a pedestrian connection, with potential for future link road onto Main Street.	Sufficient space is provided between site 4 and 5. An access road is provided to the south of site 5.

**Site 15 – Balcurris Garden**



Site Number 15

Indicative Map Only

Figure 23: Site Brief no. 15 (Source: DCC)

The site brief is accompanied by the following requirements.

Table 10: Design Requirements for Site 15

Area Wide Objectives	Development Response
<b>Height:</b> 2-3 storeys	Proposed height ranges from two to three storey high.
<b>Estimated capacity:</b> c. 10 units based on detailed design.	Eight units are provided.
Apartments is designed prior to the realignment of Balcurris Road, houses will require the realignment to Balcurris road to be in place.	The development includes the realignment of the Balcurris Road. It includes a mix of houses and apartments.
Provide transition of scale between the existing two-storey housing and Main Street.	Transition of scale is provided.

Site 16 – Balcurris Close

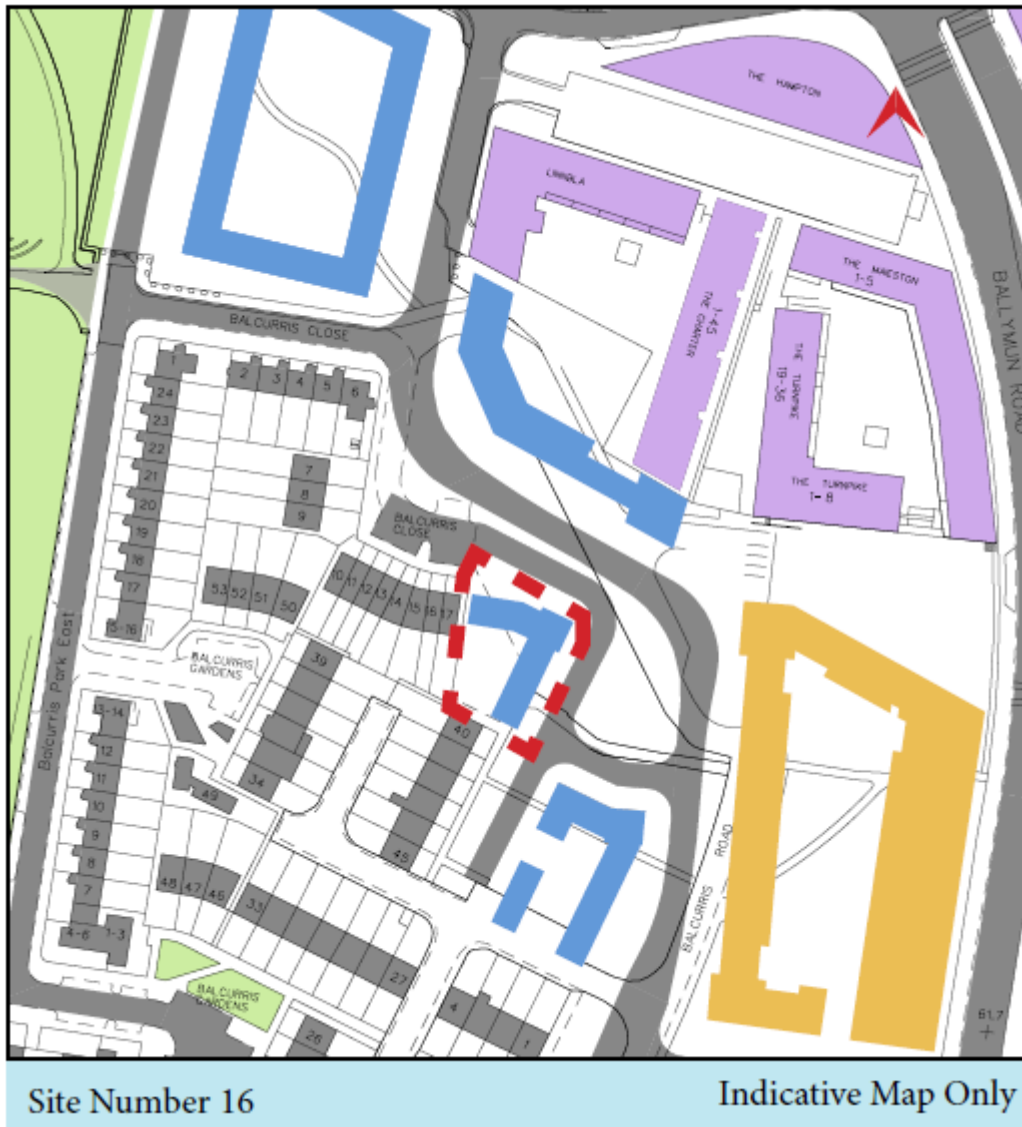


Figure 24: Site Brief no. 16 (Source: DCC)

The site brief is accompanied by the following requirements.

Table 11: Design Requirements for Site 16

Area Wide Objectives	Development Response
<b>Height:</b> 2 storeys	Proposed height is two storey high.
<b>Estimated capacity:</b> c. 10 units based on detailed design.	Five units are provided.
<b>Supporting Information / Requirements:</b> Frontage to the proposed Balcurris Road extension and continuity to the existing terraced housing at Balcurris Close.	The development provides for frontage along the Balcurris Road.
Provide transition of scale between the existing two-storey housing and Main Street.	Transition of scale is provided.

Table 12: Design Requirements for Site 17 – South of Santry Cross

Area Wide Objectives	Development Response
<b>Height:</b> 3/4 – 5 storey	Proposed height is 4-storey at the northern end where the block abuts Linnbhla. The middle section of the block is 3-storey to face the units proposed to the west better. It then rises to 6-storey to front St Pappins Square. Height are aligned with the established parapet heights in the area. Further details are provided in the appendix 1 of this report.
<b>Estimated capacity:</b> c. 20-40 units based on detailed design.	34 no. units are provided.
<b>Supporting Information / Requirements:</b> Frontage to the proposed Balcurris Road extension and continuity to the existing terraced housing at Balcurris Close.	The development provides for frontage along the Balcurris Road.
Provide transition of scale between the existing two-storey housing and Main Street.	Transition of scale is provided.

*Table 13: Design Requirements for Site 18 - Balcurris*

Area Wide Objectives	Development Response
<b>Height:</b> 3/4 – 5 storey	Proposed height is two storey high.
<b>Estimated capacity:</b> c. 40-50 units based on detailed design.	109 units are provided. More units can be accommodated than that envisaged in the LAP. This does not impact on the quality of the development proposed or impact on the proposed and existing residential amenities.
<b>Supporting Information / Requirements:</b> Design principles to replicate those established in PA.Reg.Ref. 3234/09.	The development provides for a strong urban block which addresses the street and turns corner.

## 8. ENVIRONMENTAL ASSESSMENTS

### 8.1 Environmental Impact Assessment

An Environmental Impact Assessment (EIA) Screening report was prepared by MacCabe Durney Barnes to accompany this Part 8 application. It concludes:

*'Having regard to the nature and scale of the proposed development which is below the thresholds set out in Class 10 of Part 2 of Schedule 5, the criteria in Schedule 7, the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001, as amended, and the following:*

- *The scale, nature and location of the proposed impacts*
- *The potential impacts and proposed mitigation measures*
- *The results of the any other relevant assessments of the effects on the environment.*

*It is considered that the proposed development would not be likely to have significant effects on the environment and it is concluded that an environmental impact assessment report is not required.'*

### 8.2 Appropriate Assessment

An AA Screening Report has been prepared by NM Ecology and accompanies this application. The report concludes:

*'In Section 3 of the OPR guidance (OPR 2021), it is stated that the first stage of the AA process can have two possible conclusions:*

#### **1. No likelihood of significant effects**

*Appropriate assessment is not required and the planning application can proceed as normal. Documentation of the screening process including conclusions reached and the basis on which decisions were made must be kept on the planning file.*

#### **2. Significant effects cannot be excluded**

*Appropriate assessment is required before permission can be granted. A Natura Impact Statement (NIS) will be required in order for the project to proceed.*

*Having considered the particulars of the proposed development, we conclude that this application meets the first conclusion, because there is no likelihood of significant impacts on any European sites. This is based on three key conclusions:*

- *The Site is not within or adjacent to any European sites, so there is no risk of direct effects*
- *There are no surface water (or other) pathways linking the Site to any European sites, so there is no risk of indirect effects*
- *Surveys have demonstrated that the Site is not of importance for any birds associated with nearby SPAs.*

*Appropriate Assessment Screening must consider the potential implications of a project both in isolation and in combination with other plans and projects in the surrounding area. An 'in-*

*combination effect' can occur when a project will have a perceptible but non-significant residual effect on a European site (when considered in isolation), that subsequently becomes significant when the additive effects of other plans and projects are considered. However, as the proposed development poses no risk of impacts on European sites in isolation, the risk of in-combination effects can also be ruled out.*

*Therefore, with regard to Article 42 (7) of the European Communities (Birds and Natural Habitats) Regulations 2011, it can be concluded that the proposed development will not be likely to have a significant effect on any European sites. On this basis, the assessment can conclude at Stage 1 of the Appropriate Assessment process, and it is not necessary to proceed to Stage 2.*

*In accordance with the OPR 2021 guidance, we note that no mitigation measures have been considered when reaching this conclusion.'*

### 8.3 Preliminary Ecological Appraisal

A preliminary Ecological Appraisal accompanies this Part 8 application prepared by NM Ecology. The report concludes:

*'As the Site is of low baseline value and no ecological impacts are currently envisaged, it is not necessary to carry out an Ecological Impact Assessment. This Preliminary Ecological Appraisal may be included in the Part 8 application to demonstrate that ecological features have been considered. Screening for Appropriate Assessment is provided in a separate document.*

*As noted above, the proposed development is likely to provide a net gain in biodiversity (subject to the landscape proposals), and thus complies with Policy GI 16 of the Dublin City Development Plan'.*

### 8.4 Flood Risk Assessment

A desktop Flood Risk Assessment has been prepared by Malone O'Regan. The report concludes:

*'The analysis and flood zone delineation undertaken as part of this DFRA indicates that the proposed site is not expected to be impacted during the occurrence of a 0.1% AEP (1 in 1000 year) fluvial flood event.*

*The PFRA flood mapping indicates that the proposed development site does not fall within the predicted extreme 0.1% (1 in 1000 year) current scenario fluvial flood zone. The site is located near the River Wad and River Santry. The site is not in a fluvial or tidal flood zone for either area.*

*The node point closest to the northern boundary of the site is referenced as node point 09CAMM00084. The 1% AEP (1 in 100 year) and 0.1% AEP (1 in 1000 year) flood levels at this point are predicted as 54.53m and 54.63m respectively. Using the information obtained from the predicted flood level, in order to permit a sustainable development of this site and to mitigate against potential residual flood risk to the development it is recommended that the finished floor level for all units should be above a minimum level of 54.63m + 300mm freeboard = 54.93m. This is in line with the requirements of the Dublin City Development Plan 2022 – 2028.*



*The minimum finished floor level within the proposed site is 62.30m i.e. 7.57m above the minimum recommended floor level.*

*The site passes the Justification Test outlined in 'Planning Systems and Flood Risk Management: Guidelines for Planning Authorities November 2009'.*

*An analysis of OPW records indicates that the site is not at risk of tidal flooding.*

*The flood mapping shows a risk of moderate pluvial flooding throughout the site. The pluvial flooding is concentrated on roadways. The proposed drainage system will collect surface water runoff from the site and attenuate to equivalent greenfield run-off rates; this will mitigate the potential pluvial flood risk arising from the development site.*

*In consideration of the above assessment, analysis and recommendations, overall development of the site is not expected to result in an adverse impact to the existing hydrological regime of the area or to result in an increased flood risk elsewhere.'*

## 9. CONCLUSION

In summary, the proposed development is for social housing on zoned lands under the control of Dublin City Council. The proposed development consists of apartments with landscaped areas, community, arts and cultural space.

The proposed development will make a positive contribution to the consolidation of the urban fabric in Ballymun, which has been a long-standing objective of Dublin City Council and prior, of Ballymun Regeneration Limited. The development will provide much needed natural surveillance to the area which is very exposed. In addition, it will strengthen the building frontage on both the Balbutcher Lane and Ballymun Road.

The housing mix is reflective of the housing needs of the area and will make positive contributions to meeting the demand for homes in the area. The proposed development will contribute to strengthening the neighbourhood character of Ballymun by providing a mix of uses. It will also make positive contribution to the public realm with the provision of the new St Pappin's Square which vista will be closed off by the Old St Pappins Church to the east.

## Appendix 1 – Building Height Assessment

Table 3 of Appendix 3 of the Dublin CDP 2022-2028 sets out the performance criteria in assessing proposals for enhanced height, density and scale. The table is reproduced below with a development response provided.

	Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale	Development Response
1	To promote development with a sense of place and character	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>• respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints,</li> <li>• have a positive impact on the local community and environment and contribute to 'healthy placemaking',</li> <li>• create a distinctive design and add to and enhance the quality design of the area,</li> <li>• be appropriately located in highly accessible places of greater activity and land use intensity,</li> <li>• have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area,</li> <li>• not be monolithic and should have a well-considered design response that avoids long slab blocks,</li> <li>• ensure that set back floors are appropriately scaled and designed</li> </ul>	<p>The proposed development respect the surrounding environment.</p> <p>The tallest element is to be located on site 17 and will face the new St Pappin's Square. This will allow to close the vista from St Pappin's Church located to the east of Main Street.</p> <p>Overall the development will add to the urban fabric of Main Street, strengthening Main Street, providing definition to its west side.</p> <p>St Pappin's Square will become an important focal point on Main Street. It will be activated owing to the surrounding units proposed at ground floor of site 5 and site 17.</p> <p>Height varies across the site with a general transitional decreased from Main Street to the west toward the Balcurris Garden Estate toward the east.</p> <p>Variety in façade treatments and materials is proposed throughout the site to complete the changes in height. This avoids the creation of monolithic blocks.</p>

	Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale	Development Response
			<p>For further information on the design rationale, please refer to the Architect Design Statement.</p>
2	<p>To provide appropriate legibility</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>• make a positive contribution to legibility in an area in a cohesive manner,</li> <li>• reflect and reinforce the role and function of streets and places and enhance permeability.</li> </ul>	<p>This part of Main Street has long suffered from an incomplete outlook due to the site remaining vacant since the demolition of the blocks.</p> <p>The proposed development will make positive contribution, bringing a continuous active façade along the west side of Main Street. This will bring natural surveillance and entice lower speeds on Main Street.</p> <p>The development has been designed to ensure permeability and connectivity between Main Street and the estates to the west.</p>
3	<p>To provide appropriate continuity and enclosure of streets and spaces</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>• enhance the urban design context for public spaces and key thoroughfares,</li> <li>• provide appropriate level of enclosure to streets and spaces,</li> <li>• not produce canyons of excessive scale and overbearing of streets and spaces,</li> <li>• generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3,</li> <li>• provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.</li> </ul>	<p>The development will result in the creation of two public spaces. The first in the new St Pappin’s Square which will become a focal point just off Main Street.</p> <p>The second is the central area of public open space located east of site 16. It also faces site 17. Its configuration, located in close proximity to the community, arts and culture units in site site 17 and 5, will create movement and animation along the Balcurris Road.</p> <p>No long stretches of facades are created.</p> <p>The rear of site 17 and the centre of block 5 and 18 will be communal courtyards for the use of the</p>

	Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale	Development Response
			<p>residents of the blocks. These are well overlooked by the residential units they serve.</p>
<p><b>4</b></p>	<p>To provide well connected, high quality and active public and communal spaces</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>• integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport,</li> <li>• be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards,</li> <li>• ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16,</li> <li>• ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development,</li> <li>• ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated,</li> <li>• provide for people friendly streets and spaces and prioritise street accessibility for persons with a disability.</li> </ul>	<p>High quality public realm is proposed throughout the site, details of which can be found in the landscape plans and report and the architect’s design statement.</p> <p>Pedestrian and cyclist movements are prioritised throughout the site with dedicated routes provided.</p> <p>The daylight and sunlight analysis provided by Digital Dimensions show that the <i>‘all proposed public and communal amenity spaces achieve sunlight levels that exceeds 2 hours over 50% of the required amenity space on the 21<sup>st</sup> March’</i>.</p> <p>A wind microclimate modelling was prepared to accompany this part 8 application. It concludes that <i>‘no areas are unsafe and the proposed development does not create conditions of distress. All the ground amenities outlined in the report can be utilized according to their intended scope’</i>. It also confirms that <i>‘all balconies are safe for occupants with no identified distress areas’</i>.</p> <p>All parts of the public realm have been designed to be accessible to all regardless of their physical abilities.</p>
<p><b>5</b></p>	<p>To provide high quality, attractive</p>	<p>Enhanced density and scale should:</p>	<p>As can be seen in the documentation accompanying this</p>

Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale	Development Response
and useable private spaces	<ul style="list-style-type: none"> <li>not compromise the provision of high quality private outdoor space,</li> <li>ensure that private space is usable, safe, accessible and inviting,</li> <li>ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16,</li> <li>assess the microclimatic effects to mitigate and avoid negative impacts,</li> <li>retain reasonable levels of overlooking and privacy in residential and mixed use development.</li> </ul>	<p>application, especially the landscape plans, the architects drawing, the daylight and sunlight report and the microclimate report, areas of private open space are of a high quality design. All spaces are usable, safe, accessible and inviting.</p> <p>The daylight and sunlight assessment found that 100% of the living, dining, kitchen and bedroom spaces achieve the target values set out in BS EN 17037:2018+A1: 2021 section NA1.</p> <p>There is no undue overlooking in the proposed or existing residential units.</p>
6 To promote mix of use and diversity of activities	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>promote the delivery of mixed-use development including housing, commercial and employment development as well as social and community infrastructure,</li> <li>contribute positively to the formation of a 'sustainable urban neighbourhood',</li> <li>include a mix of building and dwelling typologies in the neighbourhood,</li> <li>provide for residential development, with a range of housing typologies suited to different stages of the life cycle.</li> </ul>	<p>The development includes a mix of uses to include:</p> <ul style="list-style-type: none"> <li>288 residential units;</li> <li>1,611 sqm of retail and commercial floor space;</li> <li>324 sqm creche;</li> <li>1,058 sqm of community, arts and culture space split into three units;</li> <li>Public open space.</li> </ul> <p>This reflects the zonings of the site, which requires the provision of a mix of uses (Z4) and public open space (Z9).</p> <p>As demonstrated in this report and the Architect Design Statement and the HQA, the proposed development includes a mix of building and housing typology.</p>



	Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale	Development Response
			It also includes Universal design units which can be adapted to individual household needs.
7	To ensure high quality and environmentally sustainable buildings	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>• be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, noise and views to minimise overshadowing and loss of light – see Appendix 16,</li> <li>• not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain,</li> <li>• ensure a degree of physical building adaptability as well as internal flexibility in design and layout,</li> <li>• ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive,</li> <li>• maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage,</li> <li>• be constructed of the highest quality materials and robust construction methodologies,</li> <li>• incorporate appropriate sustainable technologies, be energy efficient and climate resilient,</li> <li>• apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances compensatory design solutions may be allowed for where the meeting of sun lighting and daylighting requirements is not possible in the</li> </ul>	<p>The design and layout of the site has been modulated to allow for maximum access to natural daylight and ventilation. It includes 57.6 of dual aspect units. All units have been designed to avoid noise transmission across units.</p> <p>The Climate and Energy Statement shows how the building will meet the highest standards of energy efficiency.</p> <p>The architect design statement provides information of the materials used.</p> <p>Reference is made to the daylight and sunlight report, the architect design statement, the climate action part L report, and the building lifecycle report.</p> <p>Reference is also made to the Desktop Flood Risk Assessment which has not identified flood risk at the site.</p> <p>Surface water proposals can be viewed in the Engineering Rports and the SuDS Drainage Details and the SuDS layout drawings.</p>

Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale	Development Response
		<p>context of a particular site (See Appendix 16),</p> <ul style="list-style-type: none"> <li>incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place – see Appendix 13,</li> <li>include a flood risk assessment – see SFRA Volume 7.</li> <li>include an assessment of embodied energy impacts – see Section 15.7.1.</li> </ul>
<p><b>8</b></p> <p>To secure sustainable density, intensity at locations of high accessibility</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport,</li> <li>look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design</li> </ul>	<p>The site is located in an area served by existing and planned high capacity high – frequency public transport, making it highly accessible. Full details can be found in the Traffic Mobility Management Plan.</p>
<p><b>9</b></p> <p>To protect historic environments from insensitive development</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments – see section 6 below.</li> <li>be accompanied by a detailed assessment to establish the sensitivities of the existing environment and its capacity to absorb the extent of development proposed,</li> <li>assess potential impacts on key views and vistas related to the historic environment.</li> </ul>	<p>There is no conservation area in the vicinity of the site. St Pappin’s Church, located across the road is the closest protected structure.</p> <p>The 6-storey element proposed on site 17 will allow close the vista from the church toward the proposed square. St Pappin’s Square has been designed to respect the church.</p> <p>Site sensitivities are fully addressed in the Architect Design Statement.</p>

Objective		Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale	Development Response
<b>10</b>	To ensure appropriate management and maintenance	Enhanced density and scale should: <ul style="list-style-type: none"> <li>• Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc.</li> </ul>	A community safety strategy can be found in the architect design statement.



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