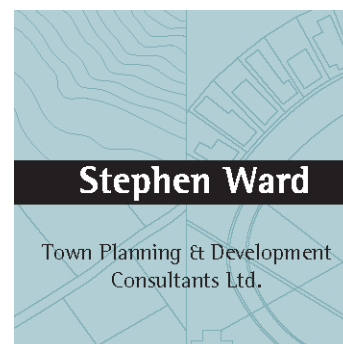


Applicant's A.22(2A)(b) Response Statement to Fingal County Council LRDO081 LRD Opinion

Residential Development at Flemington Lane, Bremeore & Flemington, Balbriggan, Co.Dublin



Prepared by Stephen Ward Town
Planning and Development Consultants
Limited behalf of Lagan Homes
Balbriggan Ltd



CONTENTS

1.0 Introduction	5
2.0 Response of the Applicant to S.32D Issues Raised	6
2.1 Fleming Local Area Plan Phasing.....	6
2.1.1 Applicant's Response	6
2.2 Flemington Local Area plan Development Layout and Character Area 4	11
2.2.1 Applicant's Response	11
3.0 Response of the Applicant to Information Specified under Article 16A.....	14
3.1 Principle of Development	14
3.1.1 Response of the Applicant	14
3.2 Flemington Local Area Plan Phasing and Planning Strategy	14
3.2.1 Response of the Applicant	15
3.3 Residential Density and Calculation of Net Site Area	16
3.3.1 Response of the Applicant	16
3.4 Flemington Local Area Plan (LAP) Development Layout and Character Area 4.....	17
3.4.1 Response of the Applicant – Compliance with LAP Layout Diagrams	17
3.4.2 Response of the Applicant – Housing Along Link Street.....	18
3.4.3 Response of the Applicant – Pedestrians Crossing Link Street	19
3.4.4 Response of the Applicant – Link Street Frontage.....	19
3.4.5 Response of the Applicant – Active Travel Hub Detailed Design.....	20
3.4.6 Response of the Applicant – Location of Active Travel Hub	20
3.4.7 Response of the Applicant – Proximity to Apartment Block C To Active Travel Hub	21
3.4.8 Response of the Applicant – Gateway Building	22
3.4.9 Response of the Applicant – Community Floorspace	22
3.4.10 Response of the Applicant –Delivery of the Active Travel Spine	28
3.4.11 Response of the Applicant – Passive surveillance of Active Travel Route	28
3.4.12 Response of the Applicant – Set Back for Future Road upgrades	29
3.4.13 Response of the Applicant – Bungalows on Flemington Lane	29
3.4.14 Response of the Applicant – Frontage onto Flemington Lane.....	29
3.5 Development Management and Design Standards	31
3.5.1 Response of the Applicant – Minimum Separation Distances.....	31
3.5.2 Response of the Applicant – Separation from Existing Development boundary.....	31
3.5.3 Response of the Applicant – Housing Quality assessment	32
3.5.4 Response of the Applicant – Car Parking for Duplex/Apartments.....	32
3.5.5 Response of the Applicant – Car Parking for Housing	32
3.5.6 Response of the Applicant – Taking in Charge.....	33

3.6 Residential Development.....	33
3.6.1 Response of the Applicant – Residential Layout.....	33
3.6.2 Response of the Applicant – Housing Design	34
3.6.3 Response of the Applicant – Boundary Treatments	36
3.6.4 Response of the Applicant – Materials/Finishes	36
3.7 Non-Residential Development – Childcare Facility.....	36
3.7.1 Response of the Applicant – Crèche Location	37
3.7.2 Response of the Applicant – Crèche Design	37
3.7.3 Response of the Applicant – Development Management Criteria	38
3.8 Architects’ Department Requirements	38
3.8.1 Response of the Applicant	38
3.9 Housing Section Requirements (Part V Delivery)	39
3.9.1 Response of the Applicant	39
3.10 Water Services Department Requirements	39
3.10.1 Response of the Applicant – Surface Water	39
3.10.2 Response of the Applicant – Flood Risk.....	40
3.11 Parks and Green Infrastructure Division Requirements	40
3.11.1 Response of the Applicant – Existing Trees and Hedgerows	40
3.11.2 Response of the Applicant – Boundary Treatments	41
3.11.3 Response of the Applicant – Public Open Space	42
3.11.4 Response of the Applicant – play Provision.....	42
3.11.5 Response of the Applicant – Incidental Strips of Grass	42
3.11.6 Response of the Applicant – SuDS within Grass Margins and Open Space	43
3.12 Transport Planning Section Requirements	44
3.12.1 Response of the Applicant – Westward Extension of the Active Travel Spine	44
3.12.2 Response of the Applicant – Active Travel Spine Design	45
3.12.3 Response of the Applicant – Pedestrian Connectivity	46
3.12.4 Response of the Applicant – Link Street Design	47
3.12.5 Response of the Applicant – Traffic and Transport Assessment	47
3.12.6 Response of the Applicant – Link Street/Flemington Lane Junction Design.....	47
3.12.7 Response of the Applicant – Works to Flemington Lane.....	48
3.12.8 Response of the Applicant – Connectivity Flemington Lane	49
3.12.9 Response of the Applicant – Application Red Line Boundary.....	49
3.12.10 Response of the Applicant –Temporary Works Speed Limit	49
3.12.11 Response of the Applicant – Bus Stops and Bus Accessibility	50
3.12.12 Response of the Applicant – Swept Path Analysis	50
3.12.13 Response of the Applicant – Bicycle Parking	50

3.12.14 Response of the Applicant – Motorcycle Parking	51
3.12.15 Response of the Applicant – Car Parking and EV Charging.....	51
3.12.16 Response of the Applicant – Road Hierarchy	52
3.12.17 Response of the Applicant - Sightlines	52
3.12.18 Response of the Applicant – DMURS Compliance	52
3.12.19 Response of the Applicant – Shared Surface Detailed Design.....	53
3.12.20 Response of the Applicant – Filtered Permeability Details.....	53
3.12.21 Response of the Applicant – Stage 1 Road Safety Audit.....	53
3.13 Environmental Impact Assessment and Appropriate Assessment	54
3.13.1 Response of the Applicant EIA sCREENING.....	54
3.13.2 Response of the Applicant AA sCREENING	54
3.14 Letter of Consent	54
3.14.1 Response of the Applicant	55
3.15 Document Requirements.....	55
3.15.1 Response of the Applicant	55
APPENDIX A: Copy of Fingal County Council LRD Opinion.....	56

1.0 INTRODUCTION

An LRD meeting was held with Fingal County Council on the 4th of June 2026. An LRD Opinion report was issued by Fingal County Council on the 1st of July 2026. This statement is prepared in accordance with Article 22 (2A) (b) of the Planning and Development Regulations 2001 (as amended) in response to the LRD Opinion issued under Section 32D of the Planning and Development Act 2000 (as amended) by Fingal County Council.

As per S32D of the Planning and Development Act 2000 as amended, the purpose of the Opinion report is to form an LRD opinion as to:

- (1) Whether or not the documents submitted for the purpose of the meeting constitute a reasonable basis upon which to make an LRD planning application.
- (2) If it is considered that the documents submitted for the purpose of the meeting do not constitute a reasonable basis on which to make an LRD planning application:
 - a) The areas, or the issues, in respect of which the documents submitted do not constitute a reasonable basis on which to make the application, and
 - b) Any issues that, if addressed by the relevant documents, could result in the documents constituting a reasonable basis on which to make the application

A response to the issues raised under Section 32D(2) is provided at Section 2 of this statement.

Article 16A (7) of the Planning and Development Act 2000 (as amended) provides that when issuing an Opinion in accordance with section 32D of the Act a planning authority, may, in addition to the requirements of section 32D, notify the prospective LRD applicant that specified information in addition to the requirements of Article 23, should be submitted with any LRD application for permission for the proposed development including photographs, plans, maps, drawings, assessments or other material or particulars where the planning authority considers it appropriate.

A summary of the information provided by the applicant in response to the request under Article 16A(7) is provided at Section 3 of this statement.

This statement includes a summary of the responses detailed by Waterman Moylan Consulting Engineers for the project, JFOC Architects for the project and NMP Landscape Architects for the project in their respective reports and makes reference to the documents and drawings provided to the planning authority as part of the planning application package. This statement should be read in conjunction with the details, drawings and documents under separate cover.

2.0 RESPONSE OF THE APPLICANT TO S.32D ISSUES RAISED

Section 8.0 of the LRD Opinion Report contains the LRD Opinion of Fingal County Council with further detail set out in section 8.1. For ease of referencing, the two areas/issues identified in respect of Section 32D(2) are restated in italic text below with the response of the applicant to each item directly following.

2.1 FLEMING LOCAL AREA PLAN PHASING

The proposed development is not in accordance with the phasing requirements set out in Chapter 9 of the 2024 Flemington Local Area Plan (LAP) as the current proposal will not deliver the central active travel spine and new link street as part of the overall development proposals brought forward in Phase 1. It is noted earlier discussions between the applicant and the Planning Authority included proposals for the development of the entire LAP lands in a more comprehensive manner. The LAP requires that both the central active travel spine and new link street are provided as part of the overall development proposals brought forward in Phase 1 and, as such, the current proposal would be contrary to the phasing requirements of the LAP.

2.1.1 APPLICANT'S RESPONSE

The proposed development is the first planning application within Phase 1. There is no requirement in the LAP for Phase 1 to comprise of a single planning application. The items to be undertaken within Phase 1 e.g. Active Travel Spine and Link Street, will only ever be constructed in tandem with housing. So even if everything was contained in a single application, they will only be provided in tandem and in sequence with the construction of houses.

One of the key objectives of the applicant in making this application is to get the construction of houses started within the LAP area at the earliest possible opportunity and to provide those elements that fall within the part of the LAP area to which the application relates in tandem with the construction of the houses, e.g. sections of the Link Street and Active Travel Route, crèche, MUGA and public open space that fall within the application site area.

We ask the PA to note that there is no requirement within the LAP to have elements such as the full length of the Link Street and Active Travel Spine contained within a single application and/or fully provided and completed in advance of the construction of houses within the LAP area. We submit such an approach would be unworkable and unreasonable. There is nothing in the LAP to say that Phases cannot be made up of a series of planning applications. At the same time the applicant wishes to emphasise that all of the physical and social infrastructure elements of the LAP within the application site area are provided as part of the planning application.

The intention is to make this planning application and then follow up with a second application for the balance of the LAP lands.

As detailed in the statement of consistency under separate cover, the Flemington LAP:

1. Provides for development of the LAP lands in 2 no. strategic phases, with inbuilt provision for flexibility in form through the inclusion of the following passage:

The phasing of development is subject to the participation and engagement of individual landowners/developers.

Figure 1 Extract from Para. 9.4 Page 48 of the LAP

2. The phasing programme, which identifies the physical and social infrastructure required to be provided in tandem with the development of a particular phase, before being able to move on to the next phase, is provided by Table 9.1.

PHASE 1	PHASE 2
c.232 no. - c.296 no. Residential Units c.2,600 sqm - c.2,900 sqm Community Floorspace c.1,000 sqm - c.1,100 sqm Commercial Floorspace	c.232 no. - c.296 no. Residential Units
Development to be undertaken during Phase 1	Development to be undertaken during Phase 2
Active Travel Spine Link Street Proposal Community Park Community Facilities and ancillary car park Commercial Floorspace Active Travel Hubs SUDS Garden Public Plaza Teenager Space Playground MUGA/games recreational area	Community Garden SUDS Garden Age Friendly Accommodation

Table 9.1: Phasing of Development Summary

Figure 2 Extract from the Flemington LAP

As discussed at s.247 and stage 2 meetings, two strategic phases are proposed by the applicant in line with the LAP requirements to ensure provision of physical and social infrastructure in tandem with residential development. The illustration below summarises the proposed 2 no. strategic phases, which provide for the delivery of all the scheduled infrastructure in table 9.1, in the appropriate phase, in accordance with the LAP objectives and in tandem with residential development. The applicant again wishes to emphasise that Both the Link Street and Active Travel Spine are in Phase 1.

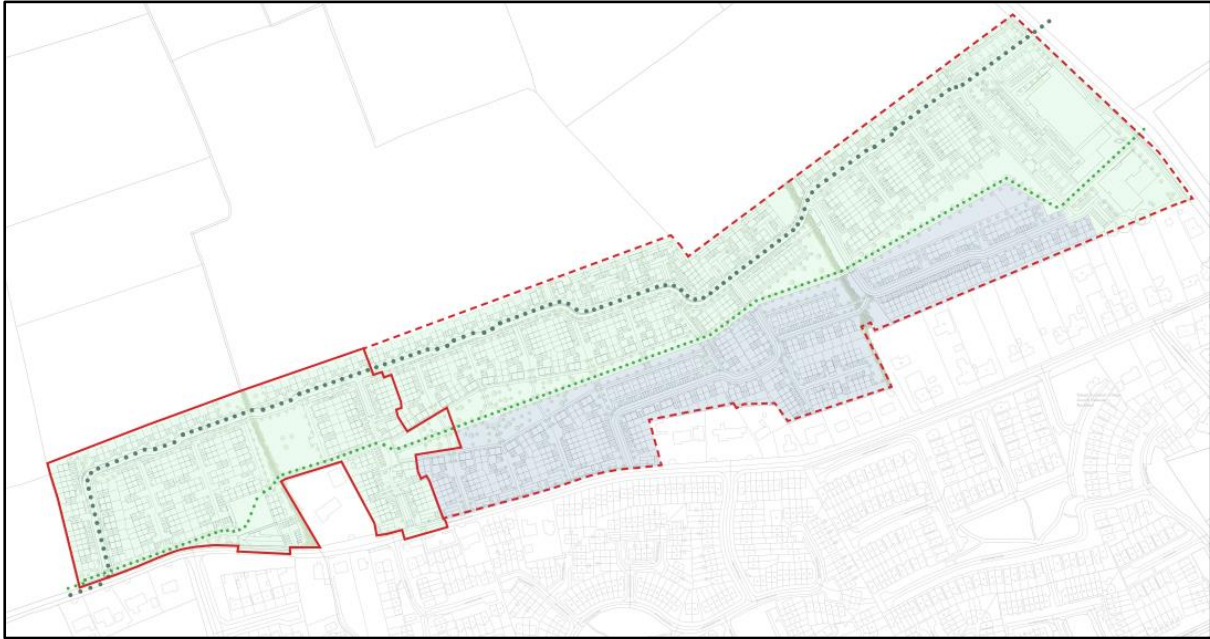


Figure 3 Two Strategic Development Phases

As acknowledged at section 8.1 of the Opinion Report, the applicant is the landowner of the entire LAP area providing significant advantages for the coordination of physical and social infrastructure provision in tandem with housing development. Preplanning consultation has commenced for a second planning application for the balance of the LAP lands (LRD0090) and a context drawing that accompanies this planning application demonstrates the fully integrated approach to the development of the total landholding. The phasing applied (figure 3 above) will achieve all the objectives contained in Table 9.1 in the required phase.

The purpose and intent of the approach of the applicant is to get the construction of houses started on the LAP lands whilst the balance of the lands is designed and engineered. The LAP lands represent a large complex site that takes time to design and engineer and so the applicant intends to make this application for the 146 dwellings to allow development to get going. The site is particularly complex towards the central and eastern end where a local centre is proposed. This application (146 dwellings) will be followed by a further application for the balance of the lands. As noted, the required LAP social and physical infrastructure elements contained within the application site area are provided as part of the planning application.

As detailed by Table 9.1 of the LAP, Phase 1 development is estimated to include approximately 296no. dwellings. This is almost twice the number proposed by the subject planning application. The development as proposed does not preclude achievement of any of the LAP objectives and has been designed in compliance with the LAP key considerations for Character Area 4 as detailed by LAP Chapter 5 and summarised below.

It is submitted that the comprehensive development of CA4 as part of Phase 1 as shown in figure 3 above will ensure all key considerations and development objectives are achieved, inter alia:

1. Proposed frontage of new buildings that will address Flemington Lane and associated established residential development.
2. Proposed internal streetscapes that will address the proposed new link street running along the LAP northern boundary and new internal streets.
3. Provision of vehicular, pedestrian and cyclist accesses onto Flemington Lane.
4. Ensuring new development does not impact upon the residential amenity of properties located on Flemington Lane to the south.
5. Facilitating the western access point for the east-west active travel route through the LAP lands and connectivity with CA3.
6. Accommodating a new active travel hub.
7. Provision of new community floorspace.
8. Retention of mature vegetation in so far as possible and appropriate replacement and augmentation to accommodate new proposals.
9. Planting proposals situated on Flemington Lane.
10. Provision of quality public open space including MUGA/games recreational area.
11. Incorporation of a SuDS garden.



Figure 4 Extract from Site Layout Plan illustrating the achievement of LAP objectives for CA4

Character Area 4	LAP	Proposed Development
Gross Development Area	4.4ha	4.4ha
Net Development Area	3.27ha	3.3ha
DPH Range (net area)	37dph-47dph	41dph
Housing Typologies	Townhouse, duplex and apartments. 1-4 beds	Townhouse, duplex/simplex apartments. 1-4 bedroom sizes.
Approx. Unit Nos.	121no.-154no.	146
Quantity of Public Open Space	0.47ha	0.5ha
Community infrastructure	MUGA SuDS Garden	MUGA SuDS Garden
Community Floorspace	400-500sq.m	382sq.m Crèche with 153sq.m play space. 80sq.m Active Travel Hub (open structure)
Section of Active Travel Route	0.36ha (no length stated)	363 linear metres (0.123ha based on 4m width) The Active Travel Route has been extended from the starting point indicated by the LAP, providing an additional 68m from the active travel hub to the western site boundary.
Section of new Link Street	No quantity/length stated	380m of link street proposed
Roads and Access	Provision of vehicular, pedestrian and cyclist accesses onto Flemington Lane.	The proposed development will create three vehicular access points onto Flemington Lane as well as an off road cycle and pedestrian route. Two pedestrian crossings are proposed on Flemington Lane.

Table 1 LAP Compliance

The phasing as proposed by the applicant and the planning strategy accelerates the delivery of homes. It is a core objective of FCC's housing and development policy to accelerate the delivery of housing. There is an existing services connection on Flemington Lane that can serve the proposed development by gravity. It has been demonstrated through assessment; the proposed development can be facilitated on the existing road network without causing congestion and the completion of the link street is not required to serve the proposed development.

The approach of the applicant is the fastest way of getting housing on the market while meeting the objectives for Character Area 4. Basically, a permission for the proposed development of 146 houses will allow development of the LAP lands to commence, with the required LAP Phasing provisions as contained within the site area of the application being provided in tandem with the construction of these houses. The development is designed to connect seamlessly with the balance of the lands, including the balance of the required LAP physical and social infrastructure elements. The seamless connection is ensured by the applicant being the owner of the overall LAP area. A planning application for the balance of the lands is presently being prepared.

There is nothing in this application that would impede the achievement of the objectives of the LAP by future planning application. Indeed, it would not be in the interests of the applicant to promote a planning application that would inhibit the achievement of the LAP Objectives.

2.2 FLEMINGTON LOCAL AREA PLAN DEVELOPMENT LAYOUT AND CHARACTER AREA 4

The proposed development and site layout plan does not accord with the 'Proposed Flemington LAP Development Layout' detailed within Figure 3.1 of the 2024 Flemington Local Area Plan (LAP) or the requirements for 'Character Area 4' set out in Chapter 5 of the LAP by virtue of, inter alia: the proposals for housing on the northern and western side of the new link street: the absence of a gateway building of increased height within the western area of the site adjacent to a community facility and Active Travel Hub, which is not located at the western entrance to the development from Flemington Lane. For these reasons, the proposed development and site layout is considered unacceptable and does not accord with the provisions of the LAP.

2.2.1 APPLICANT'S RESPONSE

Figure 3.1 of the Flemington Local Area Plan provides an indicative concept diagram and is not a development control tool. As stated by the Chief Executive Report on Submissions and Observations received on the draft Flemington LAP (CE Report) (November 2024);

"Character Area layouts as illustrated in the Plan are strategic in nature and offer one design solution to achieving LAP objectives. Layouts illustrated are not prescriptive and development proposals which come forward will be assessed against the achievement of strategic and specific objectives as provided for within this Plan, national guidelines and Fingal Development Plan objectives." (p.50)

Link Street: The Flemington LAP requires the Link Street to be designed in accordance with DMURS with an indicative street hierarchy illustrated by Figure 6.8. The provision of a single sided link street is not in keeping with good urban design principles supported by DMURS which encourage designers to clearly recognise that streets have both a place and movement function (section 3.2). A single sided street is also a highly inefficient use of infrastructure. One of the key characteristics of the street that influences its sense of place is enclosure. According to DMURS, *"The sense of intimacy, interest and overlooking that is created by a street that is enclosed and lined with active frontages enhances a pedestrian's feeling of security and well-being."* In order to design a successful street houses are needed on both sides of the new link street to create the sense of enclosure. As recognised by DMURS, *"Enclosing streets with buildings helps to define them as urban places" and "have a traffic calming effect as drivers become more aware of their surroundings."*

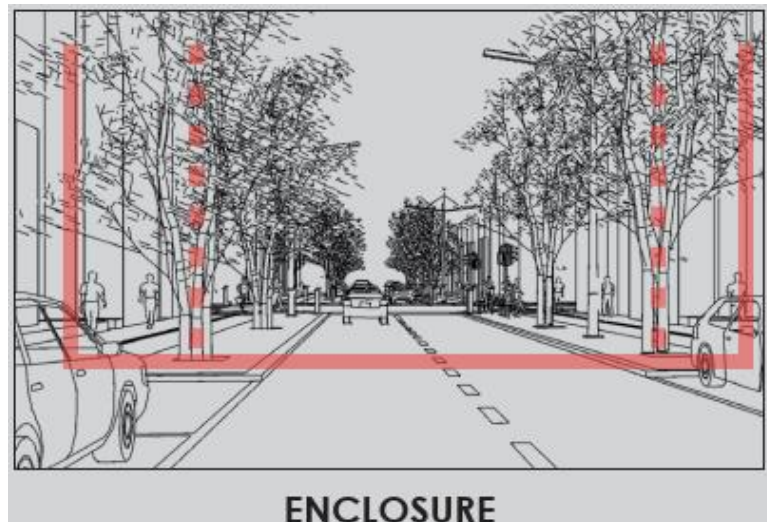


Figure 5 DMURS Key characteristics of the street that influence its sense of place

Section 4.2.1 details building height and street width ratios. In compliance with DMURS, the link street is designed to have moderate enclosure as detailed by figure 4.7 of DMURS.

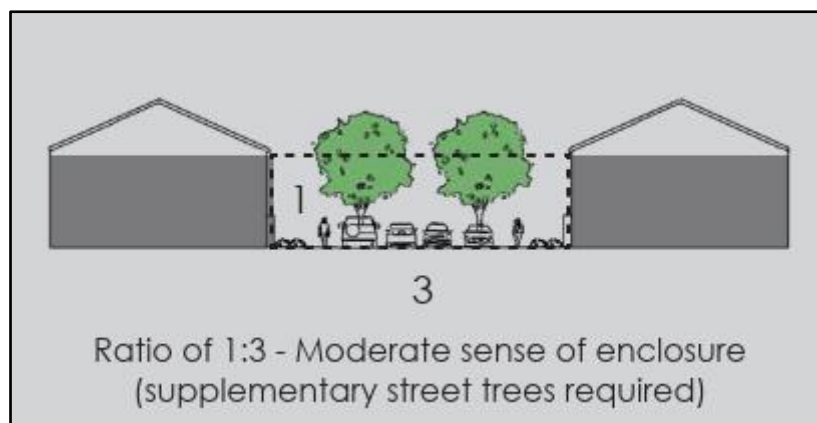


Figure 6 Extract from Figure 4.7 DMURS

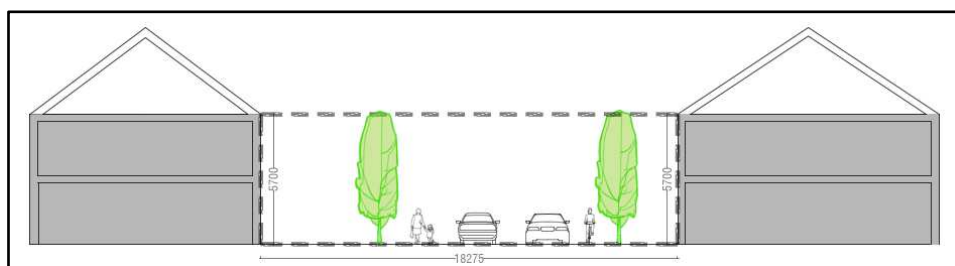


Figure 7 Illustration of Enclosure on Link Street as proposed

As emphasised in the CE Report *“future development proposals that come forward should adhere to both the strategic and specific objectives as provided for within this Plan and associated policies and objectives contained within the Fingal Development Plan, including matters related to DMURS, traffic management, access and egress, accommodation of service vehicles etc.”* (p.57). The concepts contained within the Flemington LAP and figure 3.1 have been developed from a concept into a detailed design which includes technical requirements of DMURS.

Gateway Building: The applicant has taken into consideration the comments of Fingal County Council at the LRD Meeting and LRD Opinion Report and has relocated the crèche building to front onto Flemington Lane which will form a gateway building next to the Active Travel Hub, clearly signalling the western entrance to the active travel spine. A gateway building does not necessarily require an increased building height. It is noted that the LAP states *“Gateway buildings are proposed at key locations in order to accommodate increased building height and to enhance the visual quality of the urban environment. **Each character area will respond specifically to its defined area within the LAP lands.**”* (emphasis added). The nature and pattern of the surrounding built environment would, we submit, militate against a taller building at this particular location. As such the design solution is based on use and building format and size to distinguish it from other nearby existing and proposed buildings.

Design flexibility is allowed for as outlined in the CE Report which states, *“Having regard to the proposed Gateway buildings, the design process should bring forward proposals that are responsive to the local context and identify potential opportunities for landmark buildings. Innovative design solutions for the development of each Character Area will be promoted, subject to compliance with the relevant LAP objectives, national guidance and Development Plan requirements.”*(p.50)

The application site is located opposite low density single storey dwellings. Flemington Park has no frontage onto the Lane. The crèche building is strategically placed where there is a change in character from the rural road and bungalows to the west to the more urban character to the east of the public open space at Flemington Park which coincides with the 50km/h speed zone. There are a number of urban design techniques used in this located to form a ‘gateway’, both from rural to urban and signalling the start of the active travel route through the LAP. This has been informed by the key considerations for CA4 within its context. It is submitted that the gateway building proposed is appropriate for its context and serves the purpose intended by the LAP.

Active Travel Hub: The key considerations for Character Area 4 set out in Chapter 5 of the LAP are achieved as set out above. The position of the active travel hub reflects Figure 3.1, at the start of the active travel spine within the LAP lands. Provision has been made for the onward travel westwards in recognition of the GDA strategy as indicated on sheet 4 of the Development Plan. As such the layout of the proposed development takes account of and facilitates active travel proposals that have emerged from the GDA Strategy. It is noted there is no requirement to do this as per the LAP and this approach was welcomed by the Planning Authority at preplanning stage.

3.0 RESPONSE OF THE APPLICANT TO INFORMATION SPECIFIED UNDER ARTICLE 16A

This section provides the applicant's response to the departmental requirements as detailed at the following sections of the Opinion Report and related reports attached at Appendix 3 of that Report;

- Section 8.1: Planning Department Requirements
- Section 8.2: Architect's Department Requirements
- Section 8.3 Housing Section Requirements (Part V Delivery)
- Section 8.4 Water Services Department Requirements
- Section 8.5 Parks and Green Infrastructure Division Requirements
- Section 8.6 Transportation Planning Section Requirements

3.1 PRINCIPLE OF DEVELOPMENT

The Opinion States: *The proposed development complies with the RA – Residential Area land-use zoning objective attached to the site and is considered acceptable in this regard. Notwithstanding same, the applicant is advised to continue to refer to the objective vision, and zoning use classes for the 'RA' – Residential Area land-use zoning, detailed in Chapter 13 of the Fingal Development Plan 2023-2029, to ensure compliance with same and any relevant policy and objectives outlines within the Fingal Development Plan 2023-2029 and Flemington Local Area Plan (2024).*

3.1.1 RESPONSE OF THE APPLICANT

The proposed development as amended from Stage 2 continues to comply with the RA zoning objective. 'Residential' and 'Childcare Facilities' are both use classes permitted in principle on these lands.

Full details of the proposed development and compliance with the above planning policies and documents is set out within the Statement of Consistency under separate cover.

3.2 FLEMINGTON LOCAL AREA PLAN PHASING AND PLANNING STRATEGY

The Opinion States: *The proposed phasing strategy included within the Architectural Urban Design Statement document prepared by JFOC Architects has been noted; however, it is considered unacceptable as it does not accord with the requirements of Chapter 9 of the 2024 Flemington Local Area Plan (LAP). The applicant has indicated they are splitting development of the overall LAP lands into 2no. separate LRD applications (the current proposal and a separate proposal under Ref. LRD0090 which is still awaiting to have the Stage 2 meeting). This strategy approach means the proposed development will not deliver the central active travel spine and new link street of the LAP as part of the overall development proposals brought forward in Phase 1, as is required by Objective 9.1 of the LAP and as indicated in Figure 9.1 of the LAP.*

The applicant is advised that any future LRD application must demonstrate its compliance with the phasing requirements of the LAP. In particular, the applicant is advised that the central active travel spine and new link street of the LAP must be delivered in full within Phase 1 of the overall development of the LAP lands as this is required under the provisions of the LAP.

It is noted the same applicant has held discussions with the Planning Authority regarding a concurrent LRD proposal for the development of the remainder of the LAP lands (under Ref:LRD0090 – Stage 1 meeting has been held: however, a request for the Stage 2 meeting has yet to be submitted to the Planning Authority). The concurrent proposal includes proposals for the remaining residential, communal, retail, public open space and green infrastructure, and other infrastructure required under the provisions of the LAP. In this regard, the Planning Department strongly advise the applicant to consider the submission of 1no. coherent LRD application for the development of the overall LAP in order to ensure the development of the LAP lands is delivered in full accordance with the phasing requirements set out in Chapter 9 of the LAP. The applicant is strongly advised to reconsider their approach to developing the LAP lands.

3.2.1 RESPONSE OF THE APPLICANT

The Flemington Local Area Plan proposes 2no. strategic phases of development for the Flemington Lands. Table 9.1 provides detail regarding the quantum of residential development, critical infrastructure and supporting facilities that will be brought forward during each proposed phase of development. The LAP is clear that “*The phasing of development is subject to the participation and engagement of individual landowners/developers.*” Figure 9.1 of the LAP is indicative and the Phasing Section of the LAP is intentionally, and correctly, written with a high degree of flexibility.

The applicant has put forward a two phase strategy for the development of the Flemington Lands that will achieve all of the development detailed in Table 9.1 including the key considerations of the completion of the central active travel spine and the new link street proposal during phase 1.

The Applicant has set out how the planning application (146 dwellings) meets with the LAP Requirements, including Phasing at Section 2.1.1 of this Response to Opinion. The proposed development is the first planning application within Phase 1. There is no requirement in the LAP for Phase 1 to comprise of a single planning application. Requiring the submission of single planning application will not accelerate the delivery of the social and physical infrastructure as, and as stated earlier in this Response to Opinion, social and physical infrastructure can only be provided in tandem with the construction of houses and the LAP recognises and acknowledges this. This planning application provides all of the LAP physical and social infrastructure contained in the application site area. The application site and development proposed represents Character Area 4. The planning strategy of the applicant to submit two separate planning applications to Fingal County Council is not an attempt to circumvent the provision of the supporting infrastructure identified by the LAP. As set out in detail as part of the LRD Meeting Request, the strategy is based on the sequential construction of the Flemington Lands based on service connections. The two phase strategy submitted at Stage 1 and discussed at the S.247 meeting (Ref. LRD

0081) has not changed. It was always the intention to construct the western lands first. The division of the lands into two planning applications will enable faster delivery of housing.

It is the intention of the applicant to make the Stage 2 LRD meeting request (LRD0090) as soon as possible following the lodgement of this planning application. This planning application is accompanied by a context drawing for the entire LAP demonstrating full coordination for the future development of the Flemington Lands. The applicant is the landowner of the entire area covered by the LAP and so is well positioned to manage this approach.

3.3 RESIDENTIAL DENSITY AND CALCULATION OF NET SITE AREA

The Opinion States: *The proposed net density of approx. 42dph (net) is acceptable in the context of Section 3.3.3 and Table 3.5 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) and the 2024 Flemington LAP. Notwithstanding same, the applicant is advised any future LAP application should clearly set out how the net density has been calculated (refer to Appendix B of the aforementioned Guidelines). A net site area drawing and a rational as to why each area has been discounted from the net site area should be submitted.*

3.3.1 RESPONSE OF THE APPLICANT

Please refer to JFOC drawing No. PD2001 which clearly identifies lands discounted for the purpose of calculating residential density.

The area included within the red line boundary extends to 4.4ha. This includes 0.05ha of lands in the control of Fingal County Council on Flemington Lane, included to facilitate road improvements and service connections. The development area in the ownership of the applicant extends to 4.35ha.

In accordance with Table 1 of Appendix B of the Sustainable Residential Development and Compact Settlement Guidelines (2023), net site area excludes;

- Major road/streets such as arterial streets and link streets as defined by Section 3.2.1 DMURS.
- Lands for community services and facilities.

The following areas are excluded from the calculation of net site area-

- 0.05ha on Flemington Lane in the ownership/control of Fingal County Council
- 0.40ha link street
- 0.30ha Active Travel Route
- 0.10ha Temporary attenuation area

Excluding these areas (0.85ha) results in a net site area of 3.55ha.

The proposed development provides 146no. dwellings. The residential density proposed is 41dph based on the net site area.

The residential density proposed is fully in keeping with the recommended range of 30-50dph at Section 3.3.3 and Table 3.5 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) and applied by the LAP (section 2.2.2).

3.4 FLEMINGTON LOCAL AREA PLAN (LAP) DEVELOPMENT LAYOUT AND CHARACTER AREA 4

The Opinion States: *The proposed development and site layout plan are not considered acceptable in their current format as they are not in accordance with the proposed Flemington LAP Development Layout detailed within Figure 3.1 of the 2024 Flemington Local Area Plan (LAP) or the requirements of Character Area 4 set out in Chapter 5 of the LAP. A number of issues, detailed below, are required to be addressed as part of any future LRD application.*

3.4.1 RESPONSE OF THE APPLICANT – COMPLIANCE WITH LAP LAYOUT DIAGRAMS

The above statement is similar to the Section 32D(2) item addressed at section 2.2 of this statement.

It is submitted the diagrams provided in the Local Area Plan are indicative only and not intended to become development management tools similar to a planning scheme. The intention is clearly set out by the Chief Executive Report on Submissions and Observations received on the Draft Flemington LAP in November 2024 which states;

“Character Area layouts as illustrated in the Plan are strategic in nature and offer one design solution to achieving LAP objectives. Layouts illustrated are not prescriptive and development proposals which come forward will be assessed against the achievement of strategic and specific objectives as provided for within this Plan, national guidelines and Fingal Development Plan objectives.” (page 50)

The proposed development meets with the strategic and specific objectives for Character Area 4.

The issues raised by the PA in the Opinion relating to the Flemington LAP layout are addressed below by summarising the relevant Opinion text in a blue box followed by the response of the applicant.

The proposed route of the new link street differs from that required by the LAP. Notably there are larger quantity of units proposed to the north and west of the proposed link street than shown on the LAP Layout, including a crèche unit. The LAP shows a smaller number of units to the north of the link street in the centre of the site. The proposed houses along the entirety of the western and northern side of the new link road are not acceptable as this layout is not in accordance with the layout plan of ‘Character Area 4’ of the LAP. Additionally, the layout as proposed provides unnecessary segregation of a significant number of houses from active travel route, open spaces, and community facilities. The applicant is advised significantly revised proposals are required in this regard.

3.4.2 RESPONSE OF THE APPLICANT – HOUSING ALONG LINK STREET

Section 2.2 of this Opinion Response Statement addresses the issues raised relating to conformity with the indicative layout plans provided within the Flemington LAP.

Quantity of units: The Opinion seeks revised layout plans that omit units from the entirety of the western and northern sides of the link street as the LAP has indicated a smaller number of units only to the north.

There are 16no. houses proposed along the northern boundary of the link street and 15no. along the western boundary (total 31no). As stated above, it is not the intention of the LAP to be overly prescriptive in nature. There are a number of justifications for the location of housing on both sides of the link street, including compliance with DMURS as outlined at section 2.0 of this Statement, not to mention a single sided street being a very poor use of infrastructure. The LAP does not prohibit housing both sides of the link street. The LAP contains many references to it being a flexible and non-prescriptive document. Section 5.2 of the LAP dealing with Character Areas states *“As referenced indicative development layouts are provided for each character area”*. The notation to Figure 6.7 states – *“Link Street, Cross section details (indicative)”*.

Segregation: The housing along the west and north of the link street is a short walking distance from community facilities, public open space and the future active travel route. Crossing points are provided along the Link Street with full footpath connective through local streets providing safe routes through to the plaza, active travel hub and crèche as well as the central public open space containing the MUGA. The proposal has been subject to independent review by Roadplan and there was no issue raised in relation to locating housing north or west of the link street. Further details on the pedestrianised surfaces and connectivity can be found in the documents by JFOC Project Architects, Waterman Moylan Consulting Engineers and NMP Landscape Architects for the project under separate cover.

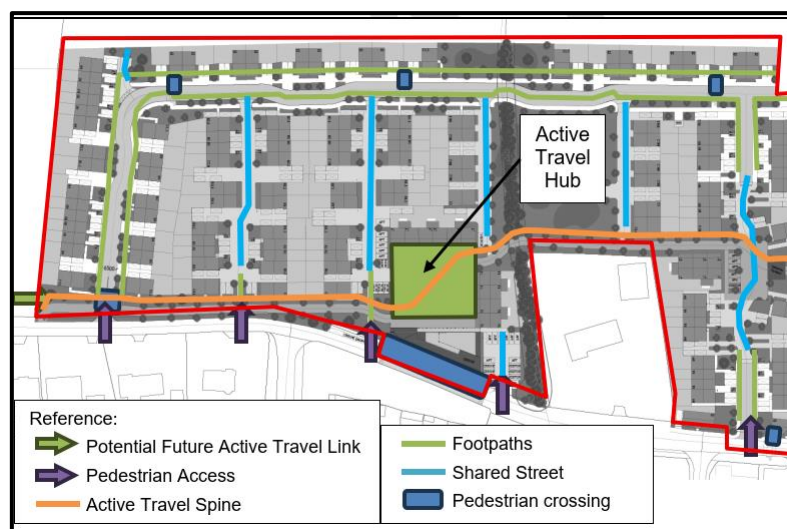


Figure 8 Extract from the DMURS Compliance Statement by Waterman Moylan

The link street of the LAP is envisaged to form part of a Road proposal linking three Regional Roads (R122, R127 and R132 and providing a ring-road around Balbriggan. Consequently, it is envisaged that there will be a large number of vehicle journeys on the New Link Street. Therefore, the proposed units located along the northern and western units in excess of the LAP will largely increase the number of people required to cross the link street which is envisaged to be a busy vehicular route. Consequently, the Planning Department do not support units to the north and west of the New Link Street in excess of that shown on the LAP layout. The development as proposed would not be acceptable.

3.4.3 RESPONSE OF THE APPLICANT – PEDESTRIANS CROSSING LINK STREET

The concerns of the Planning Authority relating to the crossing of the link street are noted. A Road Safety Audit has been undertaken by an independent Auditor and the drawings submitted with this planning application reflect the agreed designers response to problems identified. Pedestrian footpaths are provided on both sides of the link street and 4no. crossing points have been provided for pedestrians provided on raised tables, which will assist in maintaining low vehicle speeds and improving pedestrian safety. All streets entering onto the link street have vehicular ramps at each access points with adequate and clear sightlines provided in compliance with DMURS (drawing PO115). The link street is designed as a low-speed access route with a speed limit of 30kph.

The proposed Flemington LAP Development Layout detailed in Figure 3.1 of the LAP provides for strong urban frontage onto the new link street whereas the current proposal fails to achieve this due to the provision of two storey detached dwellings. This is not acceptable. The applicant is advised their proposals should be significantly revised to provide for appropriate strong urban frontage onto the new link street. This is required as part of any future LRD application.

3.4.4 RESPONSE OF THE APPLICANT – LINK STREET FRONTAGE

As stated above, the design of the link street adheres to DMURS and includes housing on both sides of the street to provide enclosure. Two storey detached dwellings are provided at the entrance to the link street and where the link street turns east. These buildings act as design cues with dual frontage turning each corner. the detached houses are repeated along the northern boundary in acknowledgement of the approach to the retained hedgerow and townland boundary and using their dual frontage to overlook public open space. The remaining house types are terraced and semi-detached. Street trees are also proposed. It is submitted that the provision of houses on both sides of street creates strong urban frontage. It is also submitted that the ‘tightness’ of the street and the relationships between buildings and the street, punctuated by open space, also creates strong urban form. As detailed in the Architects Design Statement by JFOC, material placement has been carefully thought out to positively define the public realm and provide visual interest.

The LAP details two active Travel Hubs. The one subject of this application is at the southwest of the site accessed off Flemington Lane and the active travel spine. The submitted site layout and 3D visualisation document show the required Active Travel Hub. This proposal is welcomed; however, sufficient detailed drawings of the Active Travel Hub have not been provided.

Detailed plans, sections, elevations and contiguous elevations of the proposed Active Travel Hub would be required. This should include for proposed material finishes also.

3.4.5 RESPONSE OF THE APPLICANT – ACTIVE TRAVEL HUB DETAILED DESIGN

Please refer to JFOC drawings PD7001 and PD7002 for full details of the Active Travel Hub proposed. 3D visualisations are also included within the Architect's Design Statement and in a standalone document by JFOC provided under separate cover. The cycle parking provided within the hub is in addition to the development management requirement applied to the creche and residential dwellings and includes;

- 5 no. Bicycle Storage Units
- 1 no. Bicycle Repair Station
- 14 no. Shared Bicycle Scheme Parking
- 4no short term visitor spaces
- 1 no. Storage and Maintenance Shed
- 1 no. Way-finding and Information Board

The location of the proposed Active Travel Hub is not acceptable. Chapter 5 and figure 5.7 of the LAP detail the location for the western access point for the east-west active travel route through the LAP lands. The applicant is advised the proposed location of the Active Travel Hub requires revision to be located closer to the western entrance of the site at the junction of the new link street and Flemington Lane as part of the design response advocated within the LAP.

3.4.6 RESPONSE OF THE APPLICANT – LOCATION OF ACTIVE TRAVEL HUB

According to the LAP, the Active Travel Hubs in CA4 will be located at the western access point to the central active travel spine (LAP, para. 6.7.1). Accommodating a new active travel hub and facilitating the western access point for the active travel route through the LAP lands together with connectivity with CA3 are key considerations for CA4 (LAP, Section 5.2).

The location of the active travel hub proposed is fully in keeping with the objectives of the LAP. The hub is positioned at the western access point for the active travel route within a central public plaza bound by the proposed childcare facility. The plaza is designed to be an active space making it a suitable location for the ATH and in compliance with the LAP.

The applicant proposes to extend the active travel route further westwards than indicated by the LAP. This approach has been welcomed by the Transportation Planning Section of Fingal County Council and reflects the GDA cycle network objective on Sheet 4 of the FCDP. The active travel hub is at entrance to the LAP active travel spine.

There are concerns regarding the siting of the proposed Active Travel Hub on the southern side of the development as the Hub will be located within close proximity to Apartment Block C. These concerns relate to impacts on residential amenity with regards to noise nuisance etc. Revised proposals are required in accordance with the previous comments above relating to the location of the Active Travel Hub.

3.4.7 RESPONSE OF THE APPLICANT – PROXIMITY TO APARTMENT BLOCK C TO ACTIVE TRAVEL HUB

The form of the active travel hub (ATH) has been amended following consultation with Fingal County Council and review of the LRD Opinion. According to the LAP, “hubs should be situated near housing, community and commercial buildings, and other points of interest.” The distance between the ATH and proposed dwellings has been increased providing passive supervision for security. It is envisaged that this plaza will become an active space attracting residents to both the childcare facility, the travel hub and the amenity of the plaza itself. There is strong synergies between these uses that will contribute a vibrant plaza and public realm area by providing complementary abutting uses abutting.



Figure 9 Extract from JFOC Drawing PD6005 illustrating the relationship of Apartment Block A to the Active Travel Hub

A gateway building has not been included for within the proposed development. The LAP details that a Gateway building is required within ‘Character area 4’ of the LAP lands, as per Figures 3.1 and 5.7 of the LAP. The Gateway Building should be provided at a key location, adjacent community space and the Active Travel Hub as detailed within the LAP, and accommodate increased building height to mark the entrance to the LAP

lands and the start of the active travel route; and to enhance the visual quality of the urban environment. The applicant is advised significantly revised proposals are required in this regard."

3.4.8 RESPONSE OF THE APPLICANT – GATEWAY BUILDING

As detailed above at section 2.2, the site layout plan has been amended to respond to the Opinion of Fingal County Council. The childcare facility has been relocated adjacent to the public plaza and fronts onto Flemington Lane at an important transition area and marking the western entrance to the active travel route. The design of the childcare facility is distinctive and has been integrated into the active travel hub. It is noted that the LAP states *"Gateway buildings are proposed at key locations in order to accommodate increased building height and to enhance the visual quality of the urban environment. **Each character area will respond specifically to its defined area within the LAP lands.**"* (emphasis added).

The crèche building responds the LAP requirement for a gateway buildings informed by the key considerations for CA4 within its development context. The application site is located opposite low density single storey dwellings. Flemington Park has no frontage onto the Lane. The crèche building is strategically placed where there is a change in character from the rural road and bungalows to the west to the more urban character to the east of the public open space at Flemington Park which coincides with the 50km/h speed zone. There are a number of urban design techniques used in this located to form a 'gateway' including the raised table opposite the crèche and connecting to the existing public open space to the south of Flemington Lane and the increased height enclosing the plaza as well as its synergy with the active travel hub structure.

Please refer to the Architects Design Statement by JFOC and associated 3D visualisations for full details of the creche as a gateway building.

No proposal for community floorspace have been submitted. The LAP details 'Character Area 4' of the LAP lands requires the provision of c.400-c.500sq.m of community floorspace. In this regard, the applicant is advised this community floorspace requirement is in addition to any childcare facility requirement and the Active Travel Hub. A separate community facility is required. Any proposals for community floorspace should be located adjacent to the proposed active travel hub and Gateway building on the site in accordance with the provisions of the LAP.

3.4.9 RESPONSE OF THE APPLICANT – COMMUNITY FLOORSPEACE

The infrastructure quantum provided by the LAP includes an indicative range ensuring a degree of flexibility. This is confirmed by the CE Report (p.57).

The LAP acknowledges *"The Flemington area and its residents are well served by existing social and community infrastructure including sport and recreational facilities, public open space, and educational facilities. A primary*

focus of community activity in the area is at Flemington Community Centre which is a c.10 minute walk from the LAP lands” (Section 8.2).

Character Area 4, the subject of this planning application, is the closest location in the LAP to the existing Flemington Community Centre. The Castlemill shopping centre, medical centre and schools are also within this catchment.

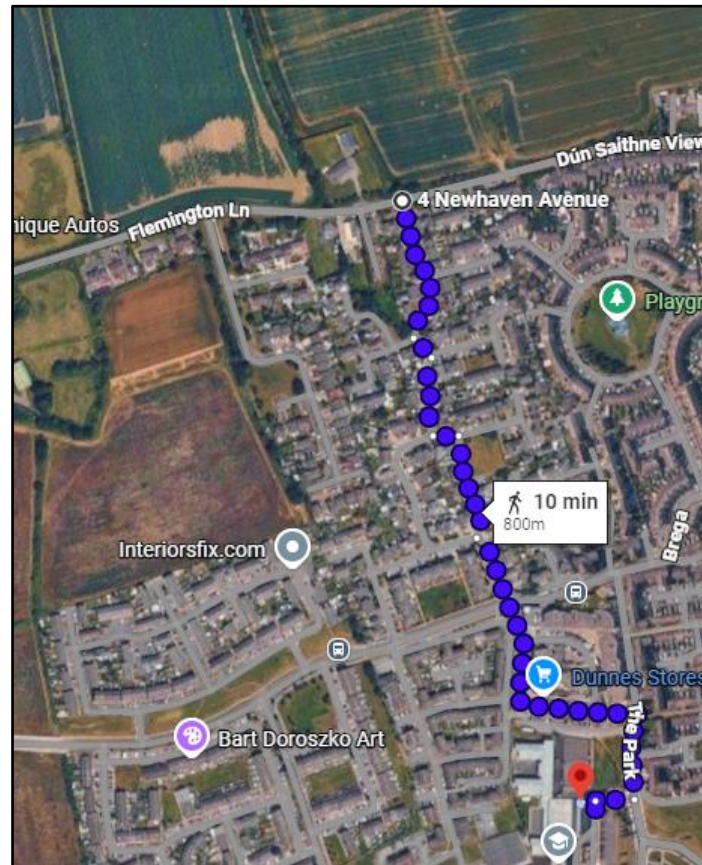


Figure 10 Walking distance to Flemington Community Centre

The LAP requires new community infrastructure to be provided in tandem with new residential development within each of the character areas. It is an objective of the LAP (8.3) to; *“Facilitate and deliver a range of community-related uses in character areas CA1, CA3 and CA4 to encourage community participation while promoting such uses as being flexible in nature to accommodate changing needs over time.”*

*The development of the LAP lands will provide for new community floorspace, **potentially** within multi-use buildings situated in CA1, CA3 and CA4.*

According to the LAP; *The arrangement of infrastructure to be provided should include, **inter alia**, new buildings with dedicated community use floorspace providing facilities **such as, but not limited to**, multi-use sports/activity hall(s), meeting rooms, offices, studios, changing areas and crèche facilities along with communal gardens, pocket parks, playgrounds/equipped areas for play, community gardens, MUGA/games recreational areas, active travel routes, gathering areas, and multi-use areas.*

The LAP clearly states (Pg.45) ***“This is not a prescriptive list but rather an indication of how the character areas may develop and grow. Individual development proposals will need to carefully assess and identify necessary social and community infrastructure requirements.”***

Again, the LAP emphasises (Pg. 45); ***“this floorspace area is not prescriptive and it should be assessed against identified community and childcare needs”***. In addition, it is clear from the LAP (Pg. 45) that community infrastructure includes MUGA/games recreational areas and active travel routes as community infrastructure. A MUGA is proposed as part of this planning application.

The LAP is clearly not prescriptive on the form, location and quantity of community floorspace to be provided in each character area. The strategy, which is welcomed by the applicant, is to provide new community infrastructure in tandem with new residential development that is commensurate with identified need.

Section 3.4 of the LAP describes the development strategy for the LAP through the creation of 4no. character areas that will comprise a variety of residential typologies, open space areas, active travel routes, community uses and Active Travel Hubs.

Character Area 4 (CA4) is located at the western end of the LAP lands measuring c.3.27 ha in area (net). CA4 will comprise a mix of residential and community uses, public open space including MUGA/games recreational area and an Active Travel Hub.” (p.15) The table included on page 27 of the LAP indicates c.400-c.500sq.m of community floorspace within CA4.

It is acknowledged that one of the Key Considerations for CA4 includes, inter alia: Provision of new community floorspace. The LAP does not exclude the provision of childcare facilities from the consideration of community floorspace. In addition, and as noted above, it clearly includes MUGA/games recreational areas and active travel routes as community infrastructure. A MUGA is proposed as part of this planning application.

Objective 8.4 requires *“Large residential and mixed use development proposals shall be supported by a social infrastructure audit to identify community-related requirements.”*

This planning application is supported by a community and social infrastructure audit utilising the 1km radius required under Objective DMSO78 of the Fingal County Development Plan 2023-2029 (as varied) which takes into consideration of planned and permitted facilities and the result of the ‘Community, Sport and Recreational Facilities Audit’ undertaken on behalf of Fingal County Council in April 2025 prepared by KPMG Future Analytics to provide insights, gap analysis and recommendations around these facilities.

Community, Sport and Recreational Facilities Audit Summary of Recommendations for Balbriggan		
	Future FCC provision	Demand Assessment
Pitch Sports	Bremore Active Recreational Hub; pitch Taken Into Maintenance	2 additional pitches by 2029*
Observation on Audit: It is noted that the potential demand for pitches identified by the Audit assumes no cross over so is a conservative approach. The Audit does not appear to include the new GAA pitch provided at the western end of Hamlet Lane to the south of the application site or the permitted pitches to the east of the R132 illustrated by figure 3. A further pitch is proposed to be provided as part of the permitted LRD by Glenveagh Homes (P.A. Ref. LRD0069-S3e).		
Water Activity Facilities	Castlelands pool (25m, 6-lane)	Primary target for improving pool access/provision. Balbriggan is the priority location for a new swimming pool.
Observation on Audit: The proposed construction of a public swimming pool building was advertised in accordance with Section 179 of the Planning and Development Act 2000 (as amended) in February 2026 with submissions accepted to the 6th of March 2026. This will address a key deficit.		
Indoor Activity Facilities	None listed	Prioritise increasing accessibility around settlement periphery in north, including outdoor gym facilities and outdoor basketball courts.
Observation on Audit: The Audit records that while Balbriggan settlement has above average provision of indoor activities, it is recommended that access to indoor facilities be increased in the residential areas surrounding Skerries Road and Hamlet Lane. The distribution was also identified for improvement particularly within a reasonable walking distance of the settlement periphery. The application site is a c.10-minute walk from the Flemington Community Centre which has a host of activities including fitness classes, dance classes, Pickle Ball, Ballet, Yoga and many more indoor activities for both children and adults.		
Outdoor Activity Facilities	New playground (play audit)	Prioritise increasing accessibility around settlement periphery in north, including outdoor gym facilities and outdoor basketball courts.

Observation on Audit: While the demand assessment includes the provision of outdoor basketball courts, the strong provision of indoor basketball facilities is acknowledged to decrease the pressure on this front. The Audit records Balbriggan settlement has a good number of outdoor activity facilities with no part of the settlement more than a 15 minute walk from a location. The Fingal Playgrounds Accessibility Audit (2023) shows a gap to the south of the town around the Skerries Road.

The proposed development will provide a MUGA where an outdoor basketball court can be provided.

The Audit undertaken does not identify any specific need for community sport and creation facilities for the Flemington Area but recommends outdoor activity facilities “around settlement periphery in north”. The MUGA provided as part of the proposed development will assist in addressing this objective.

The Fingal County Development Plan 2023-2029 (as varied) identifies the provision of appropriate childcare facilities as an essential part of new residential development -

Objective CIO28 – Childcare Facilities and New Development

Require the provision of appropriate childcare facilities as an essential part of new residential and mixed-use developments in accordance with the provisions of the Childcare Facilities Guidelines for Planning Authorities 2001 or any superseding Guidelines, or as required by the Planning Authority. Such facilities should be provided in a timely manner and be an integral part of the development proposal.

According to the Childcare Facilities Guidelines (2001), “The threshold for provision should be established having had regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas.”

A childcare demand assessment is provided under separate cover. This study includes a predicted make-up of the proposed residential area and analysis of existing childcare services in the area as advised at Appendix 2 of the Guidelines. This assessment has shown that while there are four existing childcare services within 1km of the site, only one, at Flemington Community Centre is within realistic walking distance of the application site (Really Cool Afterschool & Montessori School Ltd).

Taking account of the accessibility of existing services and the predicted population profile, a need was identified for a new childcare facility within the proposed development. The capacity of the proposed crèche was calculated on the benchmark of one childcare facility (with a minimum of 20 no. places) per 75 no. dwellings in accordance with associated guidance as contained in the Childcare Facilities Guidelines for Planning Authorities (2001). The position of the crèche on site responds to feedback from Fingal County Council.

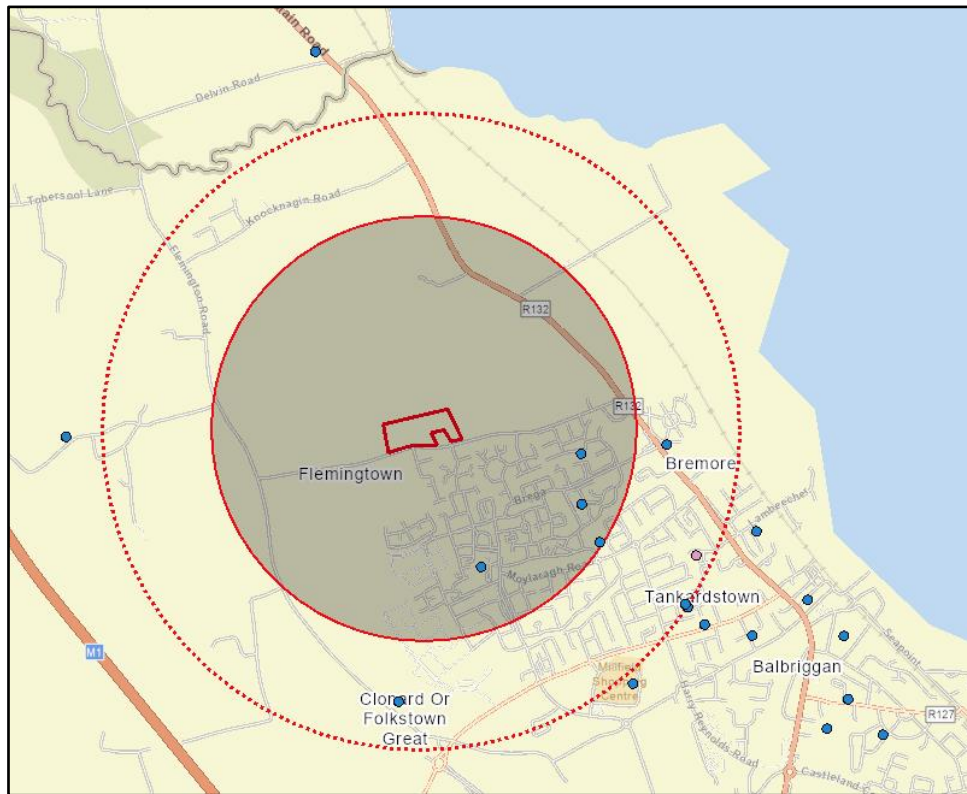


Figure 11 Childcare Services

The Fingal County Council Opinion advises the applicant to continue to refer to the objective vision for RA – Residential Area land use zoning (para. 8.1 of Opinion) as well as the objectives outlined within the LAP. The vision for the ‘Residential Area’ zoning is:

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

It is submitted that the proposed development of 146no. dwellings clearly accords with this vision by way of its location within walking distance of existing community facilities, the provision of a mix of house sizes, types and tenure, supported by the provision of a childcare facility and MUGA. The level of community floorspace provided is in line with the LAP and meets the need identified for this location and projected population.

The application has been amended from that proposed at S1 stage with now only a portion of the Active Travel Spine being proposed to be delivered as part of this application. Currently the connectivity at this location is poor and the development as proposed would not provide satisfactory connectivity. For the proposed development to be considered acceptable to the Planning Department the entirety of the Active Travel Spine and required works to the R132 to provide the required connectivity must be included. The application red line boundary should be extended to include the entirety of the Active Travel Spine.

3.4.10 RESPONSE OF THE APPLICANT –DELIVERY OF THE ACTIVE TRAVEL SPINE

The proposed development is the first planning application within Phase 1 of the Flemington LAP and provides the first section and western entrance to the active travel spine. A raised table with pedestrian crossing will be provided on Flemington Lane, east of the entrance to Flemington Park and a second crossing point will be provided to the east of the entrance to Newhaven Avenue at Newhaven Court to safely bring residents to the south of the lane where there is full footpath connectivity east to the R132. The applicant acknowledges that footpath connectivity along the north side of Flemington Lane could be improved and as such will provide footpaths where the application site meets Flemington Lane to improve connectivity in the future.

It is submitted that to require the provision of the active travel route, which will be over 1km in length attached to a development of 146no. dwellings, would be unreasonable and unnecessary. As stated by the LAP, infrastructure is to be provided in tandem with residential development. This is necessary not only to support the provision of these facilities but to provide the critical mass of people to use them and make them safe by way of passive supervision and active use.

All residential blocks within the vicinity of the proposed active travel route should interact accordingly with the route as it transverses through the centre of the proposed development, with an emphasis placed on passive surveillance of the proposed travel route. Revised plans/further details are required in this regard as part of any future LRD application.

3.4.11 RESPONSE OF THE APPLICANT – PASSIVE SURVEILLANCE OF ACTIVE TRAVEL ROUTE

The active travel route is overlooked by active frontage of homes, providing passive surveillance and helping to create spaces that feel safe. The active travel spine is designed to weave through a sequence of well-defined spaces. The active travel hub within the plaza marks the beginning of the active travel route. As described in detail and illustrated by JFOC in the accompanying Architectural Design Statement, this location acts as a gateway creating a strong sense of arrival and place, surrounded by apartment buildings and the crèche to define and enclose this space. The route is compressed as it passes Block A and Block B before opening onto the central green space which is a contrast to the more formal urban plaza. The route is compressed again as it moves past housing and Block C on its journey eastwards before crossing an internal road into a second smaller plaza which forms the entrance to Character Area 3. The alignment of the route is easy to follow, with public lighting and good sight visibility and a gentle gradient in compliance with the National Cycle Manual.

Unit No.1 is located in close proximity to the junction of Flemington Lane and New Link Stret, approx. 6m from the existing road edge. This could preclude/restrict an upgrade of Flemington Lane at the southwest of the site. The section of Flemington Lane to the southwest of the site is identified on the Fingal Development Plan 2023-2029 Map Sheet No.4 Balbriggan for a Road Proposal. The proposed active travel spine and proposed

unit no.1 at the southwest corner of the site should be recessed further from the road edge and an appropriate verge provided.

3.4.12 RESPONSE OF THE APPLICANT – SET BACK FOR FUTURE ROAD UPGRADES

The site layout plan has been revised to provide a greater set back between Flemington Lane and the first house to the west of the link street junction with Flemington Lane. The proposal includes a westward extension of the active travel route as far as the western site boundary to allow for future continuation in recognition of the GDA cycle strategy detailed on Map Sheet No.4. A setback of 15m is provided behind the carriageway to facilitate any future improvement works on Flemington Lane.

There are concerns regarding the location of the proposed bungalow dwellings along the southern boundary of the site and their proximity to Flemington Lane (in terms of noise nuisance and overall residential amenity). This is considered to be a poor design response which provides for substandard levels of residential amenity. These units shall be omitted from the proposal and revised plans submitted.

3.4.13 RESPONSE OF THE APPLICANT – BUNGALOWS ON FLEMINGTON LANE

The number of bungalows have been reduced. Two bungalows are proposed to front onto Flemington Lane to the east of the application site at Newhaven Court. The LAP encourages frontage onto the lane within Character Area 4. These houses are set back 3.6m from the carriageway with a footpath and private strip/buffer zone to protect residential amenity. The bungalows offer an accessible home on one level that reflects the existing pattern of development in the area and offers variety for future residents with changing housing needs.

Further details are required regarding how the proposed development appropriately addresses Flemington Lane to the south.

3.4.14 RESPONSE OF THE APPLICANT – FRONTAGE ONTO FLEMINGTON LANE

The proposed streetscape along Flemington Lane responds to the site's context, as well as the pattern and character of surrounding development. Two storey housing is located opposite the single storey dwellings west of Flemington Park. The proposed houses are set back from Flemington Lane to provide for future road improvements as provided for on Sheet 4 of the Fingal County Development Plan and the provision of an active travel route in recognition of the GDA proposed network.

As detailed above, there is a transition east of the entrance to Flemington Park where the urban area of Balbriggan essentially begins, also identified by the 50km/h speed zone. The streetscape responds with a gateway building and three storey apartment blocks which enclose a public plaza. This intentionally designed space reaches to the south of Flemington Lane over a raised table connecting to the existing public open space north of Flemington Park. (No changes are proposed to the existing public open space north of Flemington Park.)

The application site wraps around an existing single storey dwelling (Eircode K32 K198) on a large plot looking onto Flemington Lane with c. 60m frontage. The bungalows either side of the new road east of this property are a modern interpretation of the more traditional cottages and single storey dwellings along Flemington Lane with direct frontage onto the lane and car parking accessed from the lane. It is submitted that the design solution here is respectfully of ensuring the protection of the residential amenities of the occupiers of existing dwellings on the Lane.

Please refer to the Architectural and Urban Design Statement prepared by JFOC provided under separate cover for full details and further imagery.



Figure 12 3D Visualisation by JFOC Architects - Flemington Lane

3.5 DEVELOPMENT MANAGEMENT AND DESIGN STANDARDS

A minimum separation distance of 16m must be provided between the rear/side elevations of all buildings over one storey in height (i.e. between habitable room windows above the ground floor level in accordance with SPPR1 of the Compact Settlement Guidelines). Rear separation distances of 14m are unacceptable, such as that proposed between House Type B1 and B2 in the centre of the site, whilst there are also concerns regarding the proximity of some units to the roadways. While design mitigation measures may be acceptable on constrained sites, the subject site is a greenfield site and it is considered the provision of minimum separation distances required should be readily achievable. The applicant is advised revised proposals are required to address these concerns.

Any future LRD should clearly demonstrate the required separation distances set out in SPPR1 of the Sustainable residential development and compact settlement guidelines for planning authorities (2024) are achieved. This should be indicated on the proposed site layout plan and have regard to existing development in the vicinity. Side to side separation distances set out in objective DMSO26 of the current Development Plan should also be clearly indicated in the submitted drawings where applicable.

3.5.1 RESPONSE OF THE APPLICANT – MINIMUM SEPARATION DISTANCES

The site layout plan and house types have been reviewed by JFOC Architects in response to the statement above. A minimum rear separation distance of 16m is achieved between directly opposing first floor windows to habitable rooms as detailed by JFOC drawing PD1004 Site Layout Block Plan.

There are concerns regarding the proximity of Apartment Block A at a minimum distance of 3.380m from the eastern boundary of the site. Therefore, it is recommended this element of proposed development is relocated further from the eastern boundary of the site.

3.5.2 RESPONSE OF THE APPLICANT – SEPARATION FROM EXISTING DEVELOPMENT BOUNDARY

The apartment block proposed to the west of an existing residential property (Eircode K32 K198) fronting onto Flemington Lane has been repositioned north of its previous location. The eastern façade is a minimum of 7.8m from the boundary with this property and over 27m from the existing dwelling with no directly opposing windows.

The proposed residential mix, consisting of 12no. 1-bed, 33no. 2-bed and 85no. 3-bed and 12no. 4-bed units is considered acceptable in principle subject to appropriate planning and design standards being demonstrated in accordance with the Fingal Development Plan 2023-2029, the Sustainable Residential

Development and Compact Settlements Guidelines for planning authorities (2024) the Design Standards for Apartments, Guidelines for planning authorities (2025) and the Flemington Local Area Plan (2024).

In accordance with Objective DMSO19 of the Development Plan, any future LRD application shall clearly demonstrate, both on the submitted drawings and as part of a Housing Quality Assessment, that all proposed residential units fully comply with the gross floor area, room area and room width requirements of the Quality Housing for Sustainable Communities Best Practice Guidelines (2007); SPPRs 1-4 of the Sustainable residential development and compact settlement guidelines for planning authorities (2024) and SPPR 1-8 (as applicable) and Appendix 1 of the Design Standards for Apartments, Guidelines for planning authorities (2025). Private open space should be fully located behind the building line in accordance with Objective DMSO27 of the Development Plan.

3.5.3 RESPONSE OF THE APPLICANT – HOUSING QUALITY ASSESSMENT

All architectural drawings of house plans and apartments are fully dimensioned, including room widths. A detailed Housing Quality Assessment has been prepared by JFOC Architects and is enclosed under separate cover. All housing and apartments comply with the appropriate design standards. Consistency with Section 28 Guidelines is also addressed as part of the Statement of Consistency by Stephen Ward Town Planning and Development Consultants under separate cover.

The Planning Department have concerns regarding the proposed parking arrangements for the duplex units which are located at a distance from each duplex units. Furthermore, some of the parking spaces will be located directly off Flemington Lane which is likely to result in issues of security, use by non-residents, and traffic/pedestrian safety. This is unacceptable. Revised car parking proposals are required to address these concerns.

3.5.4 RESPONSE OF THE APPLICANT – CAR PARKING FOR DUPLEX/APARTMENTS

The site layout plan has been amended and no car parking is located directly off Flemington Lane for residents. There is only a drop off area serving the crèche directly on Flemington Lane. Two car parking spaces serving unit nos. 126 & 127 are accessed from Flemington Lane but are in-curtilage. All car parking for apartments is proximate to the apartment block it serves. Please refer to JFOC drawings PD2004 for car parking allocation plan.

The applicant is advised that on curtilage parking would be considered most appropriate for all housing units proposed within the development. Any LRD application should be revised to address this matter.

3.5.5 RESPONSE OF THE APPLICANT – CAR PARKING FOR HOUSING

The site layout plan has been revised to provide all houses with on curtilage parking.

The taking in charge proposal submitted would not be considered acceptable. The applicant has previously been advised that should the road network be proposed to be taken in charge, the on-street parking spaces should also be proposed to be taken in charge and shall not be designated. Alternative management company/TIC proposals can be considered for on-street parking spaces to facilitate EV charging. A revised proposal is required.

3.5.6 RESPONSE OF THE APPLICANT – TAKING IN CHARGE

All housing now has on curtilage car parking as requested by the Planning Authority. A revised taking in charge drawings is submitted under separate cover. Communal car parking for the crèche and apartments is not proposed to be Taken in Charge. Please refer to JFOC drawing no. PD2002 for Taking in Charge proposal.

3.6 RESIDENTIAL DEVELOPMENT

Residential Layout:

1. A number of the proposed residential housing blocks include long side rear garden walls fronting internal roads and public open spaces. These should be designed out of the scheme/reduced as much as possible in their extent as part of the detailed design.
2. There are also concerns regarding the continuous nature of House Type B4 (3 Bed units) along the western area of the proposed link road. In this regard the applicant is required to provide contiguous elevations of the proposed semi-detached/terrace dwellings at this point along the proposed link road to ensure they assimilate appropriately into the development at this point.
3. All corner units shall be designed to provide dual frontage.

3.6.1 RESPONSE OF THE APPLICANT – RESIDENTIAL LAYOUT

1. JFOC Architects have reviewed the housing blocks to minimise long garden walls fronting internal roads. Please refer to JFOC drawings under separate cover.
2. The B4 house type along the western section of the link street have been replaced with a mix of terraced, semi-detached and detached two storey housing providing variety and interest to the streetscape. Please refer to JFOC Drawing nos. PD6001, 6007 and 6008 for contiguous elevations of the Link Street.
3. This is achieved. Please refer to JFOC drawings under separate cover for details.

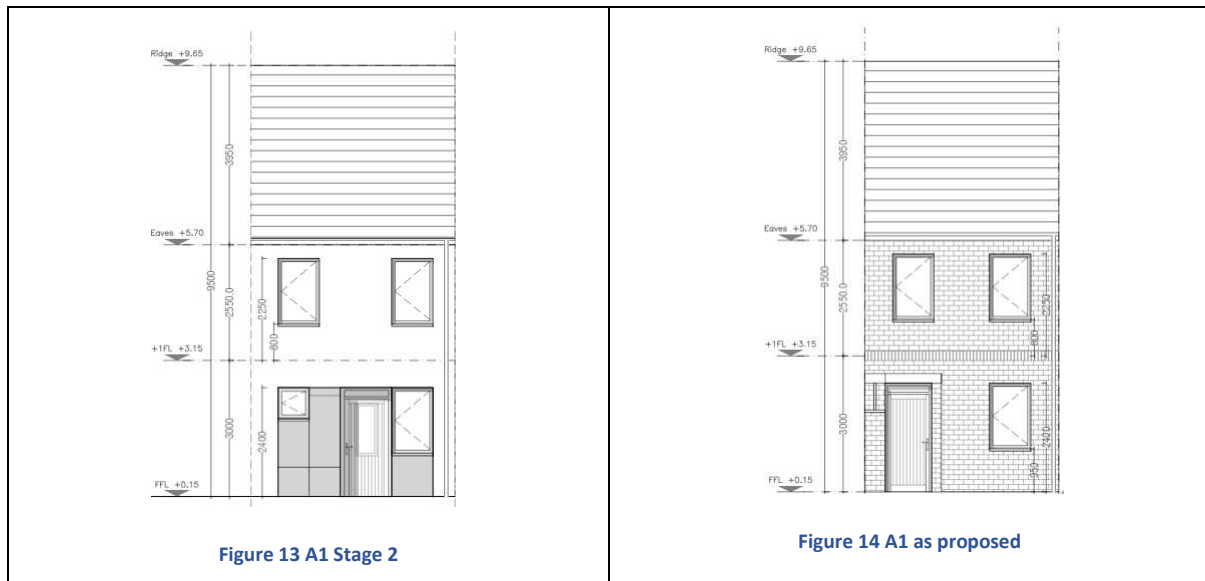
Residential Design: The Planning Department have some concerns regarding the design and internal layout of a number of the proposed units on site in particular:

1. House Type A1 (2 Bed Units) – having regard to the window to wall ratio along the front elevation (i.e. no ground floor window) and the location of the proposed toilet at ground level. The applicant is advised a second larger window should be included at ground level along with the relocation of the proposed ground floor toilet internally.
2. House Type B1 & B2 – The Planning Department have significant concerns relating to the outlook/aspect and residential amenity provided within House Types B1 and B2 as these units side onto each other and the separation distances between the fronts and sides of these units is approx. 3.6m. this is not acceptable, and revised proposals are required to address these concerns. In particular, its proposed side access, first floor windows along the side elevation and lack of first floor windows along the rear elevation. The habitable bedroom windows along the side elevation of each dwelling will provide outlook onto the gable wall of adjacent dwellings which are generally located at a distance of 3.5m from the property which would not provide for sufficient outlook or residential amenity for future occupiers. Furthermore, the proposed dwellings would also appear to overlook the rear garden of the bungalow dwellings along the southern boundary of the site. The applicant is advised a redesign of this unit type is required in order to achieve the required 16m separation distances which will allow for rear windows to the main bedrooms.
3. Internal layouts must comply with all relevant minimum space standards. In this regard, the applicant is required to submit revised proposals for Unit Type A2, B1, B2 AND B3 in terms of room width, bedroom floor area, and ensure all units proposed are in full compliance with Objective DMSO19 of the current Development plan.
4. The use of external staircases for access to the proposed duplex units is unacceptable due to maintenance and management issues and the poor standard of visual amenity provided. A higher architectural design response is needed. The applicant is required to submit revised proposals omitting any external staircase in favour of internal staircases.

3.6.2 RESPONSE OF THE APPLICANT – HOUSING DESIGN

Please refer to the Architectural and Urban Design Statement by JFOC and associated drawings for full details of the architectural design of the proposed development.

1. House Type A1 (2-bed, mid-terrace) - House types have been redesigned by JFOC Architects in response to the feedback received as demonstrated in the comparison provided below.



2. House Type B1 & B2 – The B Type 3-bedroom semi-detached house types proposed include windows on the rear elevations and corresponding distance between these house types increased in response to the Opinion.
3. The housing quality assessment clearly demonstrates all house types meet with the relevant minimum space standards.
4. The external stairs serving duplex at first/second floor open directly onto communal open space, with no public access. The Management Company will take this area in charge. A detailed appraisal is provided within the Architectural and Urban Design Statement by JFOC.



Figure 15 3D Visualisation by JFOC Architects illustrating external stairs serving duplex

Where side/rear garden walls front internal roads and public open spaces they shall be of a full brick and not render finish. Please note that boundary fencing would only be considered acceptable for use in between dwellings proposed on site.

3.6.3 RESPONSE OF THE APPLICANT – BOUNDARY TREATMENTS

The boundary treatment plan by NMP Architects (Drawing No.L1-101) identifies where full brick walls are proposed with full details of all boundary treatments provided by drawing no. L-802-1 Hard Landscape Details - Wall Details Sheet 1 of 3 provided under separate cover. Boundary fencing is proposed only between dwellings.

- Full details of the proposed finishes for each dwelling are required as part of any future LRD application. The applicant is advised that a range of materials i.e. roof tile, bricks and render would be recommended.
- All gable ends facing internal roads and public open spaces shall be of a predominantly brick, and not render, finish.
- All side elevations visible from main road should be finished in brick.

3.6.4 RESPONSE OF THE APPLICANT – MATERIALS/FINISHES

Full details of finishes are provided on the relevant JFOC Architect drawings for all house types which take account of the above feedback relating to the use of brick on gable ends and elevations visible from main roads. Please refer to the JFOC Architect's Design Statement which provides further detail on the choice of materials and material placement.

3.7 NON-RESIDENTIAL DEVELOPMENT – CHILDCARE FACILITY

Crèche Location: The Planning Department have concerns regarding the location of the proposed crèche, which will be located directly adjacent to the northern boundary of the site and within the immediate vicinity of other residential units to the east and may pose issues relating to noise, nuisance and access. It is considered that the proposed crèche should be relocated to an area which is at a sufficient distance from any proposed site boundary and residential development to have any adverse impact. The location of the proposed crèche should be reconsidered as part of any future LRD application

The location of the proposed crèche in the north-western corner of the development is unacceptable to the Planning Department. A revised proposal relocating the proposed crèche to a more appropriate location, such

as adjacent to public open space, the active travel route and community facilities, and away from bends in the roads, is needed. This is required as part of any future LRD application submission.

3.7.1 RESPONSE OF THE APPLICANT – CRÈCHE LOCATION

The childcare facility has been relocated adjacent to the public plaza and active travel route with frontage onto Flemington Lane. The crèche is a short walking distance to the central green area along a completely car free route.

The new location on the plaza will be an active space by design where children will walk/cycle/scoot along the active travel route and safe homezones without the negative effect of peak traffic due to the separation of car parking and drop off zone on Flemington Lane. The play area is fully enclosed to provide a safe and secure space which will only be used during daytime hours of operation. It is submitted that the childcare facility will aid the creation of place and will not cause nuisance or adverse impacts relating to noise or traffic.

Crèche Design: There are concerns raised regarding the design and layout of the proposed crèche (465.2sqm) having regard to the unorthodox window to wall ratio, differing pitched roof forms and lack of details provided in relation to the proposed finishes. The applicant is advised to submit a revised crèche proposal which provides for a more symmetrical design and layout with improved window to wall ratio and full finish details provided.

3.7.2 RESPONSE OF THE APPLICANT – CRÈCHE DESIGN

The crèche has been completely redesigned to address feedback from the PA and the Opinion Report. JFOC Drawing nos. PD5001-5004 illustrate the redesigned childcare facility which has been relocated to front onto Flemington Lane. The crèche is now located at the plaza forming one side of a civic space with frontage onto Flemington Lane. Please refer to the Architectural and Urban Design Statement by JFOC under separate cover for full details of the architectural design and material choice.

Development Management Criteria:

1. Full details should be provided regarding the proposed parking, drop off, accessible parking space arrangements for the facility in compliance with Tables 14.17, 14.18, & 14.19 of the Fingal Development Plan 2023-2029.
2. Full details on the bicycle parking arrangements for the childcare facility, should be provided as part of any future LRD applications. The applicant is also advised to refer to Objective DMS079 of the Fingal Development Plan 2023-2029 for further guidance.

3. Full details of the location and provision of outdoor space should be submitted for any childcare facility proposed.
4. Any future LRD application shall demonstrate the gross floor area and internal floor area of any proposed childcare facility is in compliance with the floor area standards of the 'Childcare Facilities Guidelines for Planning Authorities' (2001). The childcare facility shall cater for a range of ages as per Appendix 1 of the aforementioned guidelines.

3.7.3 RESPONSE OF THE APPLICANT – DEVELOPMENT MANAGEMENT CRITERIA

1. The crèche fronts onto Flemington Lane with car parking for staff, including accessible parking, provided to the east with access from Flemington Lane. The application site is located in Car Parking Zone 2 (Table 14.18). In accordance with Table 14.19, 3no. car parking spaces are provided to serve the crèche. A drop off zone is provided in front of the crèche on Flemington Lane to prevent through traffic.
2. The position of the crèche to the south of the active travel hub and public plaza will allow residents direct access to/from the active travel route for drop off/pick up. In accordance with Table 14.17: Bicycle Parking Standards, 18no. of cycle spaces are provided and Scooterpods will provide parking for 15no. scooters at the front of the creche.
3. Private and secure play space is provided for the childcare facility (153sq.m) which is directly accessible by all age groups. The crèche is also close to the central green along a traffic free route.
4. Full details of compliance with the floor area standards of the 'Childcare Facilities Guidelines for Planning Authorities' (2001) is included on the JFOC drawings and detailed in the Childcare Demand Assessment by Stephen Ward Town Planning and Development Consultants under separate cover.

3.8 ARCHITECTS' DEPARTMENT REQUIREMENTS

The architects' department requirements are set out at section 8.2 of the Opinion. The overall urban design approach is welcomed and deemed acceptable. However, several design elements require further refinement.

3.8.1 RESPONSE OF THE APPLICANT

We ask the PA to note that the Architects' Department did not find against building on both sides of the Link Street. The comments and advice on the architectural quality and internal layouts and space standards outlined in the PA Opinion Report and attached report by the Architect's Department has been reviewed by JFOC Architects and is reflected in the drawings submitted under separate cover. Please refer to the JFOC Architectural and Urban Design Statement for further details.

3.9 HOUSING SECTION REQUIREMENTS (PART V DELIVERY)

The applicant is advised to refer to the comments of the Housing Department with regard to the proposed developments Part V requirements and the documentation required to be submitted as part of any future LRD application.

The Housing Section provided their requirements for Part V delivery at Section 8.3 as follows-

- 30% of all social units should be universal design
- 10% of the development should be age-friendly (this is not included in the 30% mentioned).
- Part V units should be a mix of typology, bed size and pepper potted around the development.

3.9.1 RESPONSE OF THE APPLICANT

JFOC drawing PD2003 identifies the location and mix of units proposed to be transferred to the Planning Authority to meet Part V obligations. The applicant has engaged with the Housing Section and a letter of approval is submitted with this planning application under separate cover.

3.10 WATER SERVICES DEPARTMENT REQUIREMENTS

The Water Services Department comments and requirements are set out at section 8.4 of the Opinion and repeated below for reference.

Surface Water: The surface water proposals are considered to be acceptable in principle, subject to:

1. NBS (nature-based solutions) for rainwater management are proposed to address all 4 pillars of the SUDS principle and are generally acceptable.
2. Details of the proposed basins (cross sections, engineering details, materials etc) should be submitted, including the proposed temporary basins to the east of the subject site.
3. Open gate manholes within the basins should be located in the corner/low point to maximise the usable space within the basins.
4. Poor infiltration and high water table are noted in the submitted report. Details of ground investigation/site infiltration rates should be included with any submission
5. Surface water calculations, modelling data/details and SW attenuation proposals, along with design details, have been provided as part of the Engineering Assessment Report and are acceptable in principle.

3.10.1 RESPONSE OF THE APPLICANT – SURFACE WATER

Waterman Moylan Consulting Engineers have responded and addressed each of these items in the document entitled 'LRD Response – Drainage' under separate cover.

Flood Risk: The proposed scheme is a highly vulnerable development but is located in flood zone C. A commensurate SSFRA has been submitted to assess all potential flood risks on the subject site, including outlining mitigation measures in relation to pluvial flooding risk, and this is acceptable in principle.

3.10.2 RESPONSE OF THE APPLICANT – FLOOD RISK

A SSFRA accompanies this planning application under separate cover. There has been no changes to the outcome of this assessment since Stage 2. Development of the type proposed on the site, including housing, apartments and crèche do not give rise to any flood risk concerns and are in accordance with the Flood Risk Guidelines.

3.11 PARKS AND GREEN INFRASTRUCTURE DIVISION REQUIREMENTS

The following commentary is set out at Section 8.5 of the Opinion.

Existing trees and hedgerows: The proposed development will require the removal of 2 ash trees and one native hedgerow and the partial removal of four native hedgerows and one shrub group. In total approximately 319 linear metres of native hedgerow are proposed to be removed. The following is required:

- The site ecologist in association with the site landscape architect and arborist shall coordinate the Green Infrastructure Plan for the site. Based on the ecologist's guidance and recommendations, this plan shall clearly demonstrate the existing and proposed ecological corridors for this site as well as the Biodiversity Net Gain. The Green Infrastructure Plan shall clearly show how these ecological corridors function – in terms of adequate set back of development, adequate provision of space for the associated herb layer for hedgerows (in particular in relation to the Townland boundary where it meets the block). Full consideration should also be given to provision of adequate working width of a machinery (tractor mounted flail) which will be required to maintain hedgerows.

3.11.1 RESPONSE OF THE APPLICANT – EXISTING TREES AND HEDGEROWS

NMP drawing no. L1_100 details the Green Infrastructure Plan for the proposed development which has been fully coordinated with the arborist and project engineers with regard to drainage and public lighting proposed. These plans formed part of the Ecological Impact Assessment undertaken by the project ecologists Altamar under separate cover. The centrally located hedgerow which forms a townland boundary is retained and a buffer of up to 25m provided to maintain this ecological corridor which connects into hedgerows north of the site. The landscape strategy works hand in hand with the surface water drainage strategy creating habitat supporting landscapes of bioretention/swales and native planting which will further improve bio-diversity on site.

Please refer to NMP Landscape Design Statement under separate cover for full details on the consideration and treatment of the existing hedgerows on site including hedgerow enhancement planting as well as management and maintenance.

Boundary Treatments:

1. Where private property directly adjoins areas of open space, boundary treatment in the form of a fence, wall or plinth wall and railing. Any proposed hedge planting associated with the boundary should be located within the private property line.
2. The proposed boundary treatment and set back from the townland boundary needs further consideration as mentioned above in terms of the long-term retention, management and maintenance of this hedgerow.
3. It is not clear how the proposed development addresses the northern and western boundaries – how does the development address the adjoining sites. A cross sections of these areas are required; demonstrate how existing vegetation and levels are dealt with.
4. It is not clear how the development in general presents itself onto Flemington Lane. In this regard, cross sections should be provided to include the proposed development and the developments located on the southern side of Flemington Lane.

3.11.2 RESPONSE OF THE APPLICANT – BOUNDARY TREATMENTS

1. Please refer to NMP drawing no. L1_101 for details of all boundary treatments as well as drawings L-802-1 Hard Landscape Details - Wall Details Sheet 1 of 3.
2. In recognition of Objective DMSO128 and the importance of the hedgerow as a townland boundary, a setback is provided on both sides as illustrated on NMP drawings L1-100 and L1_101 with boundary treatment. The setback provided allows for the creation of a green corridor as part of multi-functional Green Infrastructure provision on site and linking large areas of open space within the site with the rural area to the north. Access to the hedgerow is available from both sides for maintenance. Please refer to the NMP Landscape Design Statement for full details of hedgerow enhancement planting as well as management and maintenance programme.
3. Please refer to NMP drawing no. L1-701_1 Sheet 1 for cross sections of the northern and western boundary treatments. There is no existing hedge along the northern site boundary. NMP drawing nos. L1-101 and L1-802 detail boundary treatments proposed.
4. JFOC have prepared 3D visualisations to illustrate how the proposed development will present itself onto Flemington Lane in addition to contiguous elevations provided on drawing nos. PD6001, PD6003 PD6005 and PD6006. Please refer to NMP drawing L-701_3 for cross section detailing the landscaping of the south of the site where it meets Flemington Lane.

Public Open Space: There are areas surrounding apartment/duplex units which are considered part of the curtilage of these buildings which would not be acceptable as Public Open Space. In addition, there are areas around private car park space which should be incorporated within the property line of the associated residential unit. In general, clear definition between public and private is required between private and public open space in the form of a wall or railing.

3.11.3 RESPONSE OF THE APPLICANT – PUBLIC OPEN SPACE

The revised site layout plan pays careful attention to the delineation of public, communal and private open spaces and avoids left over strips of open space. The layout and design of apartments proposed in three blocks provides clearly defined communal open space that is secured from public entry. As detailed by NMP drawing L1_101, the boundary treatment plan identifies appropriate treatments between these spaces with further detail by NMP drawing L1-801. Drawing NMP drawing L1_102 illustrates the areas that are counted towards communal open space and public open space provision on site. These figures do not include environmental open space.

Play provision: The play provision requirement for this development is 568sq.m. This should be clearly outlined on the landscape plan – it should be noted that a kickabout area is not considered part of the play provision calculation. The dimension of the MUGA should be clearly shown on the landscape plan. **Note:** 25m separation distance is required between play provision and residential units – ensure that exercise equipment is not located adjoining houses.

3.11.4 RESPONSE OF THE APPLICANT – PLAY PROVISION

As detailed at section 4.3 of the NMP Landscape Design statement, based on the final number and mix of dwellings proposed as part of this planning application, the play provision requirement under Objective DMSO68 is 584sq.m. The proposed development provides 666sq.m including incidental play areas as identified by drawing no.L1-103 which delineates a 25m buffer distance between play provision and residential units. Full dimensions for the MUGA are shown on drawing L1-100.

Incidental strips of grass: In general, incidental open space/grass strips should be rationalised. In this regard, incidental grass strips should be removed from one side of a road and incorporated into the other side of the road in order to increase the width of grass margins where street trees are proposed. This will allow for greater rooting volume for proposed street trees.

3.11.5 RESPONSE OF THE APPLICANT – INCIDENTAL STRIPS OF GRASS

The site layout plan has been reviewed having regard to the advice above. Grass verges along the link street and Flemington Lane are a minimum width of 1.5m. All local streets are designed as shared surfaces.

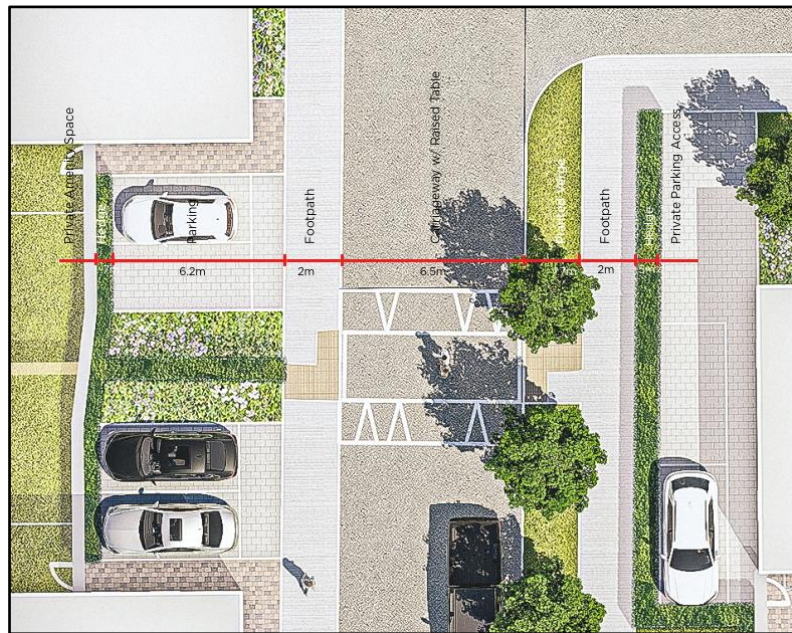


Figure 16 Extract from NMP Landscape Design Statement - Typical view of Link Street

SuDS within grass margins and open spaces:

1. Cross sections are required for all SuDS areas. In relation to swales within grass margins – the sections should clearly show the proposed drainage and its interaction with proposed street trees.
2. In general, the proposed open space areas appear to be dominated by SuDS leaving very limited space for general kickabout and pose significant difficulties for maintenance machinery access.
3. It is advised that the applicant's drainage consultant and landscape architect discuss their SuDS proposals further with Fingal's Water Services and Parks and Green Infrastructure Division prior to submission of their Stage 3 planning proposal.
4. The proposed 'boardwalk' over the SuDS area should be metal.

3.11.6 RESPONSE OF THE APPLICANT – SUDS WITHIN GRASS MARGINS AND OPEN SPACE

1. Please refer to Waterman Moylan drawing no. PO221 for cross sections of SuDS areas and PO220 for SuDS details. Tree planting as detailed by NMP Drawing No. L1-100 has been cross referenced with the drainage drawings and public lighting. NMP drawing L1-806 provides details of bioretention tree pit construction.
2. NMP details of open space function/WM details of slope/maintenance machinery access.
3. Consultation was held with Fingal County Council's Water Services and Parks and Green Infrastructure Division on the 21st of August 2026. All feedback has been incorporated into the proposal as submitted.
4. The boardwalk located within the central public open space called 'Central Park' will be of metal construction. Please refer to NMP landscape design statement and drawings for full details.



Figure 17 Extract from NMP Landscape Design Statement - Metal Boardwalk visualisation

3.12 TRANSPORT PLANNING SECTION REQUIREMENTS

The requirements of the Transport Planning Section are set out at section 8.6 of the Opinion report. Many of these requirements are included under section 8.1 of the LRD Opinion Report. Commentary restated at section 8.6 that has already been addressed in the response to section 8.1 of the Opinion Report is not repeated here. This section addresses any additional requirements of the Transportation Planning Section in a blue box in a grouped format followed by the response of the applicant.

Westward Extension of the Active Travel Spine: The active travel spine is proposed to extend further westward than that shown in the LAP which could potentially facilitate a future extension westward. This is welcomed by the Transportation Planning Section. However the active travel abuts the road edge at the southwest corner of the site. This could preclude/restrict an upgrade of Flemington Lane at the southwest corner of the site. This could preclude/restrict an upgrade of Flemington Lane at the southwest of the site.

3.12.1 RESPONSE OF THE APPLICANT – WESTWARD EXTENSION OF THE ACTIVE TRAVEL SPINE

The section of active travel route proposed at the south west corner has been set back from the road edge to allow for future upgrade of Flemington Lane as detailed on the drawings submitted under separate cover.



Figure 18 Extract from JFOC drawing 1004 with dimension of set back (15.24m)

Active Travel Spine Design: The width and design of the Active Travel spine shall be in accordance with the Cycle Design Manual. The desirable min. widths of 4m and 5m depending on cycle flows. The active travel spine is shown to have a width of 4m on submitted engineer layouts. A cross section detail of the proposed Active Travel Spine should be provided clearly showing the proposed build up and finish. The Active Travel Spine is shown in the proposed layout in a buff colour. A similar buff coloured active travel route through an LRD has recently been installed in Donabate. This would be a good comparable example for the applicant to review.

3.12.2 RESPONSE OF THE APPLICANT – ACTIVE TRAVEL SPINE DESIGN

The width and design of the active travel spine is in accordance with the Cyle Design Manual (TL106). Based on the predicted cycle flows, the cycle route will be 4m wide and will finished in a buff colour as recommended.

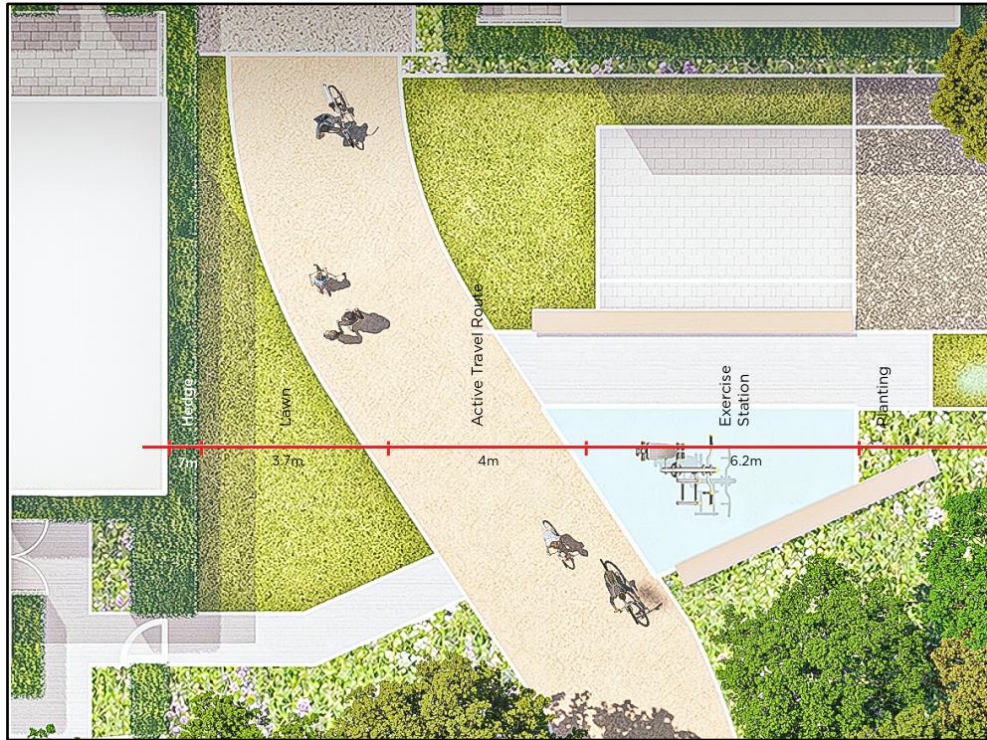


Figure 19 Extract from NMP Landscape Design Statement - Active Travel Route visualisation

Pedestrian Connectivity: Good connectivity at either end of the active travel route should be provided. A suitable link to the junction of Flemington Lane/New Link Street should be considered. Pedestrian connectivity should be provided from Flemington Lane to the proposed Active Travel Spine. A pedestrian crossing on Flemington Lane should be proposed at the access to Flemington Park. This may require alterations to existing traffic calming ramps.

The application includes parts of Flemington Lane. However, the proposals are unclear. Further details should be provided. A raised table with crossing appears to be shown opposite Flemington Park in submitted layouts. However, this has not been annotated nor detailed drawing provided.

3.12.3 RESPONSE OF THE APPLICANT – PEDESTRIAN CONNECTIVITY

As stated above, the applicant intends to extend the active travel route westwards for future onward travel. The proposed raised table provides a safe crossing point adjacent to the entrance to Flemington Park. A pedestrian crossing is also provided north of Newhaven Court which will require the removal of an existing traffic calming ramp on Flemington Lane. Please refer to Waterman Moylan drawings PO130 for full details of road markings and signage.

Link Street Design: A new link street is proposed along the North and West of the site. The new link street layout should be designed in accordance with DMURS guidance for the link streets; min 2m footpaths either side of the carriageway, associated landscaping, traffic calming etc.

3.12.4 RESPONSE OF THE APPLICANT – LINK STREET DESIGN

The design of the link street accords with DMURS guidance with footpaths of 2m either side of the carriageway and a 1.7-2m verge. Traffic calming measures are provided including horizontal deflections, reduced radii on corners and raised tables which also provide safe pedestrian crossing points. Please refer to the DMURS Statement of Consistency by Waterman Moylan Consulting Engineers under separate cover and associated drawings for full details.

TIA: A Traffic Impact Assessment and Study should be provided which should outline the expected journeys on the proposed Link Street.

3.12.5 RESPONSE OF THE APPLICANT – TRAFFIC AND TRANSPORT ASSESSMENT

Waterman Moylan Consulting Engineers have prepared a Traffic and Transport Assessment which is submitted with the planning application under separate cover. The TTA has demonstrated that the proposed development does not require the full link street to be in place as it can be adequately facilitated on the existing road network. The TTA analysis also includes the future provision of the entire link street from Flemington Lane to the R132. The analysis confirms that the road network, including the Link Street, will operate within capacity with the full LAP lands completed and occupied.

Link Street/Flemington Lane Junction Design: The LAP aims to provide a vehicular priority connecting the New Link Street to the granted Ring Road. Amendments to Flemington Lane at the new proposed junction have been proposed in an effort to address the priority envisaged by the LAP and Development Plan. The proposed junction should be further considered an appropriate drawing for the junction with sufficient detail provided.

The amended layout and junction does not show the vehicle priority order outlined in the LAP. However, from review of the amended layout and junction the desired priority appears to be possible. Consideration should be given to removing the proposed STOP point on the New Link Street and including a STOP point on the western arm of Flemington Lane with the proposed new junction with appropriate traffic calming detailed.

3.12.6 RESPONSE OF THE APPLICANT – LINK STREET/FLEMINGTON LANE JUNCTION DESIGN

The proposed junction of the new Link Street with Flemington Lane has been revised to a priority junction until the link street can provide full connectivity to the R132. As detailed by Waterman Moylan Consulting Engineers under separate cover, the proposed development provides for future upgrades to the junction with Flemington Lane and restriction of Flemington Lane to local access only.

Works to Flemington Lane: The LAP outlines 'Flemington Lane should be for local access only'. To facilitate Flemington Lane becoming local access only additional/alternative traffic calming where Flemington Lane bounds the application site should be considered. Landscape buildouts may be a good alternative restricting Flemington Lane to a single carriageway lane in places requiring vehicles to yield. This could help encourage vehicles to utilise the New Link Street over Flemington Lane as envisaged by the LAP.

Flemington Lane currently has a 50km/hr speed limit where it bounds the application site to the South. For local streets a 30km speed limit is considered appropriate in accordance with DMURS. A design speed of 30km/hr should be utilised when considering proposals addressing the above. The applicant should liaise with FCC Traffic Operations and provide proposals for review demonstrating what/where speed limit reductions would be beneficial to their proposed development and the LAP aims.

The phasing of works to Flemington Lane should be carefully considered and may require the New Link Street to be complete before works as proposed can be completed. Alternative temporary proposals to Flemington Lane and the proposed junction may be required until such time as the new Link Street connects to the R132. Interim proposals for the road network should be provided in the absence of the New Link Street connecting to the R132.

3.12.7 RESPONSE OF THE APPLICANT – WORKS TO FLEMINGTON LANE

As outline above, the interim proposal for the junction of the link street with Flemington Lane is to provide a priority junction arrangement with Flemington Lane continuing to provide connection to the R132 for all traffic.

Connectivity Flemington Lane: A considerable portion of the applicant's perimeter bounds Flemington Lane to the south of the site. Consequently, appropriate proposals to improve connectivity along Flemington Lane at a minimum where the application site bounds Flemington Lane should be provided. Proposals for Flemington Lane not bounding the applicant's site should also be considered where feasible. The proposals are unclear. Further detail should be provided. A raised table with crossing appears to be shown opposite Flemington Park on submitted layouts. However this has not been annotated nor detailed drawing provided. Additional details of the proposed works to Flemington Lane should be provided.

3.12.8 RESPONSE OF THE APPLICANT – CONNECTIVITY FLEMINGTON LANE

The application site meets with Flemington Lane in two locations along the southern boundary. In between these points, the application site wraps around an existing single storey dwelling (Eircode K32 K198) on a large plot looking onto Flemington Lane with c. 60m frontage. There is a grass verge in front of this property, however as these lands are outside the ownership and control of the applicant a continuous footpath cannot be provided to the north of Flemington Lane as part of this planning application.

The proposed footpath running from the west along the southern site boundary with Flemington Lane ends at the creche before the junction to the car park indicating to pedestrians that they should cross the road using the raised table crossing. A footpath is also provided where the site meets Flemington Lane to the east where a second crossing point is provided. There is full footpath connectivity eastwards to the R132 along the south of Flemington Lane.



Figure 20 Extract from NMP drawing L1-100 illustrating pedestrian crossing points

Red Line Boundary: The application red line boundary should be extended to include the required work to public roads, spaces etc to ensure the development can be delivered as envisaged in the LAP and outlined above.

3.12.9 RESPONSE OF THE APPLICANT – APPLICATION RED LINE BOUNDARY

The red line boundary includes parts of the public road (Flemington Lane). A letter of consent has been issued by Fingal County Council for the inclusion of these lands for the purposes of this planning application.

A Temporary Works Speed Limit may be required to be agreed with the council prior to construction and any works required to implement the order should be at the expense of the developer.

3.12.10 RESPONSE OF THE APPLICANT –TEMPORARY WORKS SPEED LIMIT

The applicant is open to discussion with Fingal County Council on this matter and would accept a condition in this regard.

Bus Stops and Bus Accessibility: The National Transport Authority welcomed the inclusion of bus stops, and associated pedestrian crossings on the Ring Road on the LRD applications to the south of Flemington Lane. The applicant should consult with the NTA to determine any desire for bus stops on the New Link Street which will form part of a Ring Road. If considered appropriate by the NTA, bus stops and associated crossings should be included on the New Link Street proposal. A bus swept path analysis should be provided on the New Link Street regardless.

3.12.11 RESPONSE OF THE APPLICANT – BUS STOPS AND BUS ACCESSIBILITY

Please refer to Waterman Moylan LRD opinion Response – Traffic for a detailed response. Bus swept path analysis has been provided for the link street (Waterman Moylan Drawing No. PO117) and a potential future bus stop is identified by drawing no. PO118.

Swept path analysis: Appropriate swept path analysis should be demonstrated for fire tender and refuse truck for the proposed development.

3.12.12 RESPONSE OF THE APPLICANT – SWEPT PATH ANALYSIS

Please refer to Waterman Moylan drawing nos. PO119 for details of swept path analysis of fire tender and PO116 refuse vehicles.

Residential Bicycle Parking Provision: Bicycle parking proposal should be adequately detailed for the S3 stage of the application ensuring it is prioritised over car parking where necessary. Cargo bicycle parking should be provided in accordance with the Cycle Design Manual (min.5%)

Crèche Bicycle Parking: Apply Table 14.17 Bicycle Parking Standards of the Fingal Development Plan. Scooter Parking may also be proposed and the short stay bicycle parking may be somewhat reduced to accommodate. Scooter parking such as ‘Scooterpods’ are also beneficial at highlighting the potential presence of young vulnerable road users. A minimum of two short-stay cargo bicycle spaces should be provided i.e. one long bicycle loop.

3.12.13 RESPONSE OF THE APPLICANT – BICYCLE PARKING

Residential: Bicycle parking is provided for all residents and visitors in line with Development Plan requirements and SPPR 4 of the Compact Settlement Guidelines. Detached and semi-detached housing have access to gardens for storage of bicycles. Mid-terrace units are provided with secure bicycle storage units to the front of each house (JFOC drawing no. PD7005)). Apartments are provided with a mix of long stay and short stay bicycle parking.

Crèche: The crèche is provided with 18no. cycle spaces and 15no. scooter parking spaces

Cycle parking provided within the Active Travel Hub is additional to the requirements applied to the creche and residential dwellings. The hub includes 14no. shared bicycle spaces, 5no. bicycle lockers and 4no. short stay spaces.

Cargo cycle parking is provided within the Central Park which adjoins the active travel route.

Full details of calculations are provided under separate cover as part of the Traffic and Transport Assessment by Waterman Moylan Consulting Engineers.

Motorcycle Parking: Section 14.17.9 Motorcycle Parking of the development plan requires motorcycle parking spaces to be provided on the basis of one motorcycle parking bay per 10 car parking spaces for non-residential developments and apartment developments. Spaces should be provided in locations convenient to building access points, similar to cycle parking requirements. Where parking is provided within streets and spaces drop-kerbs should be provided to facilitate access to motorcycle parking bays.

3.12.14 RESPONSE OF THE APPLICANT – MOTORCYCLE PARKING

Motorcycle parking is provided adjacent to the active travel hub and in proximity to the proposed apartments.

Car Parking Provision and EV Charging: The site is within Car Parking Zone 2 in an area currently described as peripheral in accordance with Table 3.8 of the Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities. The proposed residential units each have a maximum parking demand of 2no. car parking spaces in accordance with SPPR 3. This should include any requirement for EV parking and visitor parking.

Electric Vehicle parking should be provided in accordance with Section 14.17.10 of the Fingal County Development Plan. A detailed proposal for EV parking to be provided for on-street parking.

A minimum of 5% of car parking spaces provided should be set aside for disabled car parking in non-residential developments in accordance with Section 14.17.8 of the Fingal County Development Plan.

3.12.15 RESPONSE OF THE APPLICANT – CAR PARKING AND EV CHARGING

Based on the maximum parking demand of 2no. car parking spaces, 3 and 4 bedroom houses are allocated an average of 1.5 spaces per house. 2-bedroom houses have one space. A car parking ratio of 0.7 spaces per apartment has been applied with an additional 5no. visitor spaces available. Waterman Moylan drawing no. E1002 identifies the 80. Active and future E-Car charging spaces. There are 30no. off curtilage car parking spaces proposed including the 3no. allocated to the active travel hub and two of these spaces are designed to be accessible.

Road Hierarchy: A road hierarchy drawing should be provided demonstrating a similar road hierarchy to that illustrated in the LAP.

3.12.16 RESPONSE OF THE APPLICANT – ROAD HIERARCHY

Please refer to the Waterman Moylan DMURS Report under separate cover for details of the road hierarchy.

Junction Sightlines: Sightlines in accordance with DMURS should be demonstrated for proposed junctions. A sightline drawing should be provided. The landscape proposals should be reflective of the required sightlines and trees/plants which may obscure sightlines in the future should not be located within the required visibility splays.

3.12.17 RESPONSE OF THE APPLICANT - SIGHTLINES

Please refer to Waterman Moylan Drawing No. PO115 for details of sightlines and forward visibility. The site layout has been subject to an independent road safety audit. Please refer to full report under separate cover with designers response.

DMURS: A DMURS compliance statement should be provided.

3.12.18 RESPONSE OF THE APPLICANT – DMURS COMPLIANCE

A DMURS compliance statement has been completed for the proposed development by Waterman Moylan Consulting Engineers and is provided under separate cover.

Shared Surface Design: The proposed shared surface details are not in accordance with DMURS. Black SMA appears to be proposed as the finish for shared surfaces. An alternative finish should be proposed. Coloured SMA is acceptable. The proposed line marking is consistent with that of a standard road and not a shared surface. Appropriate shared surface signage and line marking should be proposed for shared surfaces. Vehicle directional arrows on the surface should be omitted as the primary users are pedestrians, not cars. Some of the proposed shared streets are proposed to have what appears to be a long at grade footpath. Most notably alongside unit nos.14-24. This should be broken with landscape buildouts as much as possible as elsewhere in the proposed development. Similarly, the street to the south of unit no.51; landscape buildouts should be introduced.

3.12.19 RESPONSE OF THE APPLICANT – SHARED SURFACE DETAILED DESIGN

The design of the shared surfaces has taken account of the above feedback. The shared surface/homezone surface is proposed as hot rolled asphalt with buff coloured chippings. Please refer to drawing nos. PO130 and PO135 for details of cross section and road markings.

Filtered Permeability: The connection detail from the shared surface at unit nos. 35-36 to the Active Travel Hub is unclear. An appropriate accessible, filtered permeability treatment should be proposed preventing cars continuing.

3.12.20 RESPONSE OF THE APPLICANT – FILTERED PERMEABILITY DETAILS

Please refer to NMP drawing L1-100 and Waterman Moylan drawing PO110 for details of kerbing and bollards proposed to clearly define the shared surface from the active travel hub and The Forum public square.

Road Safety Audit: A Stage 1 Road Safety audit must be completed and submitted with the S3 stage of the application to the satisfaction of the Planning Authority, in compliance with the TII Publication 'Road Safety Audit GE-STY-01024.

3.12.21 RESPONSE OF THE APPLICANT – STAGE 1 ROAD SAFETY AUDIT

Roadplan Consulting were appointed to undertake the Stage 1 Road Safety Audit of the proposed development. Please find the final report with designers response signed appended to the Engineering Assessment Report by Waterman Moylan Consulting Engineers.

Commentary related to the R132.

The transportation planning section provide commentary relating to the R132 from page 30 to 31 of the Opinion. The subject planning application does not include development to the immediate west of the R132 and no changes are proposed to the R132 as part of the proposed development.

The comments have been taken into consideration as part of the ongoing preparation of the LRD Meeting Request (Stage 2) for LRD planning application Ref.LRD0090.

3.13 ENVIRONMENTAL IMPACT ASSESSMENT AND APPROPRIATE ASSESSMENT

An Environmental Impact Assessment Report Screening and an Appropriate Assessment Screening (and, if necessary, a Natura Impact Statement) prepared by suitably qualified professions will be required as part of any future LRD applications.

3.13.1 RESPONSE OF THE APPLICANT EIA SCREENING

An Environmental Impact Assessment Report Screening Report has been prepared by Stephen Ward Town Planning and Development Consultants Ltd and is provided under separate cover. It is recognised that Fingal County Council are the competent authority who will undertake a formal screening and determination on the LRD planning application as submitted. It is submitted, based on the information provided, there is sufficient evidence to conclude that there is no likelihood of any significant impact on the environment arising from the proposed development

3.13.2 RESPONSE OF THE APPLICANT AA SCREENING

Altamar have prepared an Appropriate Assessment Screening outlining the information required for the competent authority to screen for appropriate assessment and to determine whether or not the Proposed Development, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any European or European site.

On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site. This report concludes *“Having taken into consideration the foul and surface water drainage from the proposed development, the distance between the proposed development to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, and the dilution and settlement effect within the existing public surface water drainage network via the indirect pathway during operation and construction, it is concluded that the proposed development would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of qualifying interests of European sites.”*

3.14 LETTER OF CONSENT

Letters of consent from respective individual landowners will be required for all works proposed on third party lands (including works required to achieve necessary sightlines). Such letters shall clearly detail the full extent of the works required on the respective lands and not just refer to the application generally. Where necessary, (e.g. cutbacks to hedgerows to achieve required sightlines), such letter shall confirm the landowner will maintain the required conditions in perpetuity to the agreement of the council.

3.14.1 RESPONSE OF THE APPLICANT

Other than adjoining public roads, the applicant is the owner of the entirety of the application site. A letter of consent has been issued for lands within the application site under the ownership/control of Fingal County Council. These lands comprise parts of Flemington Lane and are required to provide two pedestrian crossing points and infrastructure connections.

3.15 DOCUMENT REQUIREMENTS

The Opinion States: The applicant has submitted a fully detailed design statement, housing quality statement and a number of other documents as part of Stage 2 submission. However, any future LRD application should also be accompanied by all relevant supporting studies required by the current Development Plan including: A Climate Action Energy Statement (Objective DMSO261); A Construction and Demolition Waste Management Plan (Objective DMSO241); School and Childcare Needs Assessment; Screening for Appropriate Assessment (Objective DMSO1) AND Screening for Environmental Impact Assessment (Objective DMSO2).

The Opinion also requires the following documentation, reports, and requirements of the Fingal Development Plan 2023-2029 shall be submitted/addressed as part of any future LRD application:

- Design Statement (in accordance with the details of objective DMSO5)
- Housing Quality Assessment
- Daylight and Sunlight Assessment (DMSO22)
- Building Lifecycle Report
- Traffic and Transport Assessment
- Road Safety Audit (Stage 1 & 2)
- DMURS Compliance Statement
- Outline Construction Traffic Management Plan
- Mobility Management Plan
- Arboricultural Report and Tree Protection and Tree Removals Plans
- UI Confirmation of Feasibility
- Community and Social Infrastructure Audit (DMSO78)
- Proposals for Age Friendly Housing (DMSO37)
- Proposals for public art (DMSO194)
- Proposals for public lighting
- Proposals for playground facilities (Objectives DMSO68 & DMSO69)
- Construction and Demolition Waste Management Plan (DMSO241)
- Operational Waste Management Plan
- Climate Action Energy Statement (DMSO261)
- Engineering drawings and a design report
- Landscaping plans and a design rationale

3.15.1 RESPONSE OF THE APPLICANT

A table of all documents and drawings addressing the policy, objectives and requirements of the Fingal County Development Plan 2023-2029 (as varied) is attached to the Statement of Consistency.

APPENDIX A: COPY OF FINGAL COUNTY COUNCIL LRD OPINION



Large-scale Residential Development Opinion

Section 32D of the Planning and Development Act, 2000 (as amended)

Applicant:	Lagan Homes Balbriggan Ltd.
Development Location:	Lands north of Flemington Lane in the townlands of Bremore and Flemington, Balbriggan, Co. Dublin.
FCC Reference:	LRD0081/S2.
Request for LRD Meeting:	11th of May 2026.
Date of LRD Meeting:	4th of June 2026.

Contents

- 1.0 Introduction**
 - 2.0 Site Location & Description**
 - 3.0 Proposed Large-scale Residential Development**
 - 4.0 Relevant Planning History**
 - 5.0 Relevant Planning Policy**
 - 5.1 National Policy
 - 5.2 Regional Policy
 - 5.3 Local Policy
 - 5.3.1 Fingal Development Plan 2023-2029
 - 5.3.2 Flemington Local Area Plan (2024)
 - 6.0 Consultation**
 - 6.1 Section 247 Consultation
 - 6.2 LRD Meeting
 - 6.3 Fingal County Council Internal Consultation
 - 7.0 Forming of the Opinion**
 - 8.0 Opinion**
 - 8.1 Planning Department Requirements
 - 8.2 Architects' Department Requirements
 - 8.3 Housing Section Requirements (Part V Delivery)
 - 8.4 Water Services Department Requirements
 - 8.5 Parks and Green Infrastructure Requirements
 - 8.6 Transportation Planning Section Requirements
-

Appendix 1 Section 247 Pre Application Consultation Notes**Appendix 2 LRD Meeting****Appendix 3 Consultee reports**

Water Services Department

Transportation Planning Section

Parks and Green Infrastructure Division

Architects' Department

Housing Department

1.0 Introduction

Having regard to the Large-scale Residential Development (LRD) meeting that has taken place in relation to the proposed development, the purpose of this report is to form a recommended LRD opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an LRD planning application in accordance with Section 32D of the Planning and Development Act, 2000 (as amended).

This report may also specify: (a) the areas, or the issues, in respect of which the documents submitted do not constitute a reasonable basis on which to make the application and (b) any issues that, if addressed by the relevant documents, could result in the documents constituting a reasonable basis on which to make an application.

2.0 Site Location & Description

The subject site, with a stated gross site area of 4.4 hectares, is situated along the northern side of Flemington Lane, Balbriggan; at the edge of (but within) the Balbriggan development boundary. The site is undeveloped, in greenfield condition, and is accessed via Flemington Lane to the south which is a local access road. The site currently appears to be in agricultural use. There are several hedgerow/tree lines traversing the site. The site surrounds 1 no. detached residential dwelling situated off Flemington Lane; neighbours built-up residential lands to the south (zoned "RS" & "RA") on the opposite side of Flemington Lane; abuts undeveloped "GB" & "RU" zoned lands to the north and west; and undeveloped "RA" zoned lands to the east.

3.0 Proposed Large-scale Residential Development

The proposed development involves development on agricultural fields within the townlands of Bremore and Flemington, Balbriggan, Co. Dublin. The proposed LRD comprises the following:

- The construction of 142 no. dwellings in the form of 118 no. houses and 24 no. apartments in the following mix – 12no. 1-bed, 33 no. 2-bed, 85 no. 3-bed and 12 no. 4-bed units. All houses will be one or two storey in height. Duplex apartment buildings will be three storey in height.
- The construction of a two-storey childcare facility with play space, car parking and a drop off area; sized to provide for 76 no. childcare spaces.
- The proposed development will provide the first section of the Link Street of the Flemington Local Area Plan (LAP) as well as the first section of the Active Travel Route that will form a central spine through the LAP lands which commences at a gateway pavilion fronting Flemington Lane where there will be an active travel hub. Two new vehicular access roads off Flemington Lane are also proposed to serve the development.
- The proposal also provides for public open space, including the provision of a Multi-Use Games Area (MUGA), communal open space associated with apartments, landscaping, boundary treatments, car parking, bicycle parking structures, bin storage structures, works to Flemington Lane, undergrounding of ESB overhead lines, infrastructure services, and all other associated site development works.

The following tables provide a summary of the proposed unit mix and key site statistics:

Table 1: Key Site Statistics

Key Site Statistics	
Stated Gross Site Area	4.4 Hectares
Stated Net Site Area	3.3 Hectares
No. of Dwellings Proposed	142
Proposed Dwelling Typologies (No. Proposed)	Houses (118 no.) Apartments (24 no.)
Proposed Building Heights	Houses – One & Two Storey Duplex Apartments - Three storey
Proposed Residential Density	Approx. 43 Dwellings per Hectare (Net)
Proposed Public Open Space	5,049.1sq.m
No. of Car Parking Spaces Proposed	266

Table 2: Proposed Unit Mix

Proposed Houses		
Unit Type	No of Units	Gross floor space (sq.m.)
2-bed	21	1,608
3-bed	85	8,996
4-bed	12	1,560
Total Units	118	12,164

Proposed Duplexes (Apartments)		
Unit Type	No of Units	Gross floor space (sq.m.)
1-bed	12	577.2
2-bed	12	1,154.4
Total Units	24	1,731.6

4.0 Relevant Planning History

Reg. Ref: F25A/1028E: 29th January 2026 – PERMISSION REFUSED to Lagan Homes Balbriggan Limited for development on lands north of Flemington Lane, in the townlands of Breamore and Flemington, Balbriggan, Co. Dublin. The development consisted of: residential development construction operations comprising the construction of part of a link street (approximately 330 linear metres) with new vehicular access from Flemington Lane (Sections of Flemington Lane are identified as Breamore Road and Newhaven Court under Eircode), internal accesses within the application site as well as accesses to lands adjoining the application site from the proposed link street and a security building. The

purpose of the proposed development was stated as to facilitate future residential development of the application site. Refusal Reason(s):

1. *The planning authority considers the proposal to be premature and representative of piecemeal development, contrary to the principles of proper planning and sustainable development. The proposed road infrastructure is integral to the development of the lands and should be delivered in a coordinated manner in order to secure the achievement of the specific objectives indicated within the Flemington LAP. The proposed development is considered to be contrary to Policy CSP6 of the Fingal Development Plan 2023-2029 and contrary to the Phasing Strategy of the Flemington LAP.*
2. *The application fails to submit the necessary traffic and transportation assessments, including a Traffic and Transport Assessment and Stage 1 and Stage 2 road safety audits, to demonstrate that that proposed access arrangement is safe appropriate and capable of accommodating current and future traffic demands associated with the LAP lands. In the absence of this critical information the planning authority is not satisfied that the proposal would not endanger public safety or prejudice proper planning and sustainable development of the area. The proposed development has failed to demonstrate it would not comprise a traffic hazard and is therefore contrary to Objective DMSO118 of the Fingal Development Plan 2023-2029, and contrary to the proper planning and sustainable development of the area.*
3. *The applicant has failed to submit the necessary details regarding water services, in particular SUD design and necessary details regarding landscaping, in particular tree survey and arboricultural impact assessment. As such the proposed development is considered contrary to Objective DMSO203 and Policy GINHP21 and GINHP22 and objective GINHO45 and GINHO46.*

Reg. Ref: F18A/0137 (ABP-301843-18): 14th May 2018 – Notification of Decision to Refuse Permission to John Smith & Cormac Smith for development at Flemington Lane, Balbriggan, Co. Dublin. The development consisted of: (i) Construction of 73 no. dwellings [30 no. two-storey, three-bedroom, semi-detached dwellings; 9 no. two-storey, four-bedroom detached dwellings; 4 no two-storey, four-bedroom, semi-detached dwellings; 29 no. two-storey plus attic, four-bedroom, semi-detached dwellings and 1 no. two-storey plus attic, five-bedroom, detached dwellings]. Each dwelling will feature private amenity space, 2 no. on curtilage parking spaces and optional roof mounted solar panels; (ii) creation of new vehicular entrance from Flemington Lane; (iii) landscaped public open space including playground; tree planting, boundary treatments; street lighting; internal roadways, footpaths and shared surfaces (iv) foul and SuDS drainage; and (v) all ancillary works necessary to facilitate the development. The decision of the Planning Authority was subject to an appeal to An Coimisiún Pleanála. On 21st December 2018, the Commission REFUSED PERMISSION for the development.

5.0 Relevant Planning Policy

5.1 National Policy

Project Ireland 2040 – National Planning Framework First Revision

The National Planning Framework (NPF) is a high-level strategic plan shaping the future growth and development of Ireland to 2040. The NPF and the National Development Plan 2021 (NDP) combine to form Project Ireland 2040, the overarching planning and

investment framework for the social, economic and cultural development of Ireland. The Government approved the First Revision to the NPF and its associated environmental assessments in April 2025 following a period of public consultation. The NPF First Revision includes 10 no. National Strategic Outcomes (NSO) and 108 no. National Policy Objectives (NPO). Of note are the following NSOs and NPOs:

- NSO 1 'Compact Growth' seeks to deliver a greater proportion of residential development within the existing built-up areas of our cities, towns and villages, with a focus on infill development, integrated transport and the promotion of regeneration and revitalisation of urban areas, to secure a more sustainable future for our settlements and for our communities;
- NPO 4 targets half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs;
- NSO 5 'Sustainable Mobility' seeks to achieve the provision of a well-functioning, integrated sustainable transport system (walking, cycling and public transport), to enable sustainable mobility choices for citizens;
- NPO 22 seeks that planning and related standards in urban areas, including building heights and car parking, will be based on performance criteria which seek to achieve well-designed high-quality outcomes to achieve targeted growth;
- NPO 37 seeks to ensure the integration of safe and convenient alternatives to the car in the design of communities;
- NPO 43 seeks to prioritise new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

Section 28 Ministerial Guidelines and other National Policy

Having considered the nature of the proposed development and the receiving environment, relevant S.28 Ministerial Guidelines include for the following:

- Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024);
- Quality Housing for Sustainable Communities - Best Practice Guidelines for Quality Housing for Sustainable Communities Delivering Homes Sustaining Communities (2007);
- Design Standards for Apartments, Guidelines for Planning Authorities (2025);
- Cycle Design Manual (2023);
- Design Manual for Quality Housing (2022);
- Regulation of Commercial Investment in Housing (2021);
- Design Manual for Urban Roads and Streets (DMURS) (2019);
- Urban Development and Building Height, Guidelines for Planning Authorities (2018);
- Environmental Impact Assessment Guidelines (2018);
- Architectural Heritage Protection Guidelines for Planning Authorities (2011);
- Urban Design Manual – A Best Practice Guide (2009);
- The Planning System and Flood Risk Management (including the associated 'Technical Appendices') (2009);
- Appropriate Assessment Guidelines (2009);
- Childcare Facilities - Guidelines for Planning Authorities (2001) and Circular Letter PL3/2016.

5.2 Regional Policy

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

The EMRA RSES provides a development framework for the region through the provision of a Spatial Strategy, Economic Strategy, Metropolitan Area Strategic Plan (MASP), Investment Framework and Climate Action Strategy.

The Dublin MASP is an integrated land use and transportation strategy for the Dublin Metropolitan Area, which seeks to manage the sustainable and compact growth of the Dublin Metropolitan Area. The strategy for the sequential development of the metropolitan area is focused on the achievement of ambitious compact development targets of at least 50% of all new homes within or contiguous to the existing built-up area in Dublin and 30% in other settlements. The MASP identifies strategic residential, employment and regeneration development opportunities on the corridors along with the requisite infrastructure investment needed to ensure a steady supply of sites in tandem with the delivery of key public transport projects as set out in the NDP.

Strategic development corridors are identified including the City Centre within the M50; North-South Corridor (DART expansion); North-West Corridor (Maynooth/Dunboyne line and DART expansion); Southwest Corridor (Kildare Line, DART expansion and Luas red line); and Metrolink – LUAS Corridor (Metrolink, LUAS green line upgrades).

The EMRA RSES includes for Regional Policy Objectives (RPO) and the following are of note:

- RPO 5.3: Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists;
- RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan Area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing: Design Standards for New Apartments' Guidelines and 'Urban Development and Building Heights Guidelines for Planning Authorities'.
- RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns;
- RPO 7.22: Local authority development plan and local area plans, shall identify, protect, enhance, provide and manage Green Infrastructure in an integrated and coherent manner and should also have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species.

The primary statutory objective of the EMRA RSES is to support the implementation of Project Ireland 2040, which links planning and investment through the NPF and the ten-

year NDP, and the economic and climate policies of the Government by providing a long-term strategic planning and economic framework for the Region.

The recently published First Revision to the NPF will provide the basis for the review and updating of the EMRA RSES to reflect matters such as updated housing figures, projected jobs growth and renewable energy capacity allocations.

5.3 Local Policy

5.3.1 Fingal Development Plan 2023-2029

The site is located within the development boundary of Balbriggan and is governed by the policies and objectives of the Fingal Development Plan 2023-2029 and the Flemington Local Area Plan (2024).

Core Strategy and Settlement Hierarchy

Balbriggan is identified within the Fingal Settlement Hierarchy as a "Self-Sustaining Town" in the Core Area. It benefits from easy access off the M1 Motorway and is also served by the main Dublin to Belfast rail line and commuter services to Dublin City. It has developed as a major residential town with a young and expanding population of 20,000 which has more than doubled over the past 20 years. Major infrastructural projects involving upgrades to the water supply, foul drainage and roads infrastructure have been carried out throughout the town and its environs. Balbriggan is eFibre broadband enabled. The Council has prepared and is implementing Our Balbriggan 2019-23 Rejuvenation Plan, which will transform Balbriggan Main Street and Harbour and will provide significant investment in the public realm and town centre improvements to provide a more vibrant and vital centre to the town. This will be achieved in continued collaboration with stakeholders, by increasing employment, promoting industrial lands and by showcasing Balbriggan as an attractive location for investment.

The availability of zoned lands for high technology and general industrial development, together with the significant infrastructural and environmental improvements with easy access to major transport corridors, ports, rail and air networks, offer considerable potential for the town. The Council is committed to working with representative stakeholders such as the IDA, Enterprise Ireland and the local Chamber of Commerce, to attract and facilitate new employment generators into the town.

Table 2.14 'Core Strategy 2023-2029 Fingal Development Plan' of the current Development Plan sets out a housing delivery allocation of 1,902 no. units for Balbriggan during the life of the current Development Plan. The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential, if required, as per Objective CSO3 of the current Development Plan. This figure may also be subject to review via a variation to the current Development Plan when new housing supply targets are issued by the Minister for Housing, Local Government and Heritage.

Policy CSP1 – Core Strategy: *'Promote and facilitate housing and population growth in accordance with the overarching Core Strategy to meet the needs of current and future citizens of Fingal.'*

Objective CSO3 – Delivery of Housing Units: *‘Provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within each settlement. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular settlement as set out under Table 2.14, the applicant must demonstrate to the Planning Authority that the necessary social and physical infrastructure (including active travel infrastructure, accessibility to both current and planned public transport services) is in place or can be provided as part of the application to accommodate the proposed development. The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential outlined above.’*

Objective SPQHO12 – Fingal Settlement Strategy: *‘Ensure that all proposals for residential development accord with the Fingal Settlement Strategy and are consistent with Fingal’s identified hierarchy of settlement centres.’*

Relevant ‘Self-Sustaining Towns’ Policies and Objectives

The following Development Plan policies and objectives for ‘Self-Sustaining Towns’ should be noted:

Policy CSP34 – Consolidate Growth of Self-Sustaining Towns: *‘Consolidate the growth of Self-Sustaining towns including Malahide, Balbriggan, Lusk, Portmarnock, Rush and Skerries as set out in the Settlement Strategy for RSES and by encouraging infill development and compact growth rather than greenfield development and by intensification at appropriately identified locations.’*

Policy CSP36 – Focus Growth Within and Contiguous to Core in Self-Sustaining Towns: *‘Support the sustainable long-term growth of Self-Sustaining Towns by focusing growth within and contiguous to the core to create a critical mass of population and employment based on local demand and the ability of local services to cater for sustainable growth levels.’*

Policy CSP37 – Promotion of Enterprise and Employment in Self-Sustaining Towns: *‘Promote enterprise and employment throughout the County including along the Dublin Belfast Economic Corridor including Balbriggan and work with other Local Authorities to promote Fingal and the wider mid-eastern region as an engine for economic growth.’*

Policy CSP38 – Malahide, Balbriggan, Lusk, Portmarnock, Rush and Skerries: *‘Consolidate development and protect the unique identities of the settlements of Malahide, Portmarnock, Balbriggan, Lusk, Rush and Skerries.’*

Objective CSO51 – Support Growth of Self-Sustaining Towns: *‘Proactively support and promote high quality services, social infrastructure, facilities, tourism offer, appropriate retail mix, and economic activity within Self-Sustaining Towns to meet the needs of existing and future growth in line with the scale and function of these towns within the Fingal Settlement Hierarchy.’*

Objective CSO52 – Safe and Convenient Road, Pedestrian and Cycle Systems: *‘Ensure all Self-Sustaining towns benefit from safe and convenient road, pedestrian and cycle systems which promote permeability, accessibility, and connectivity between existing and new developments.’*

Objective CSO53 – LAPs, Masterplans and Framework Plans for Self-Sustaining Towns: 'As set out in Tables 2.15, 2.16, 2.17, 2.18 and 2.19:

- *Implement existing Local Area Plans and Masterplans within Self-Sustaining towns.*
- *Prepare and implement Local Area Plans for identified areas.*
- *Prepare and implement Frameworks for identified areas.'*

Objective CSO54 – Tree-Lined Approach: 'Retain existing tree-lined approaches to all towns and villages in order to preserve their special character.'

Objective CSO55 – Development and Growth of Balbriggan and Skerries: 'Promote and facilitate the development and growth of Balbriggan and Skerries as primary service, social, cultural and local tourist centres in north Fingal.'

Objective CSO56 – 'Our Balbriggan': 'Continue to implement, promote, and support the 'Our Balbriggan' Rejuvenation Plan.'

Land Use Zoning

The proposed site is zoned 'RA' – 'Residential Area' under the current Development Plan. The objective for 'RA' zoned lands is to: *'Provide for new residential communities subject to the provision of the necessary social and physical infrastructure'. The vision for 'RA' zoned lands is to: 'Ensure the provision of high quality new residential environments with good layout and design, with adequate public transport and cycle links and within walking distance of community facilities. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.'*

'Residential' development and 'Childcare Facilities' are listed as 'Permitted in Principle' uses under the 'RA' zoning objective.

The site is surrounded by 'RS', 'RU', and 'GB' zoned lands.

Site Specific Objectives and Constraints

- The site is located within a 'Coastal' landscape character type area, part of which is identified as being 'Highly Sensitive'.
- The site is located within the boundaries of the Flemington Local Area Plan (2024).

5.3.2 Flemington Local Area Plan (2024)

The proposed site is subject to the provisions of the Flemington Local Area Plan (LAP) which was adopted on the 9th of December 2024. The LAP establishes a framework for the planned, coordinated and sustainable development of undeveloped lands zoned Objective 'RA', which includes several parcels of agricultural land measuring c.17.2 hectares. The LAP seeks to provide a framework for the future development of the identified lands within northern Balbriggan, while also assisting with the provision of new housing in a locality that already includes existing residential communities. The LAP proposes a variety of public open spaces and areas for recreation; and addresses climate action. The LAP seeks to promote a modal shift in relation to how people move around the Flemington area, with a focus on utilising active modes of travel especially for short journeys.

Section 5 'Character Areas' of the LAP sets out specific provisions for the development of the lands. In particular, the lands at Flemington Lane will be developed to provide for 4.

no. different character areas. In this regard, it is noted the subject LRD proposal seeks to provide for the area of the LAP lands designated as 'Character Area No. 4'. The LAP states 'Character Area No. 4' has the potential to provide between 120-154 no. units, based on a density of 37 dph-47 dph.

The LAP also states 'Character Area No. 4' will provide a mix of residential typologies, such as townhouses, duplexes and apartment units, with unit sizes generally ranging from 1-4 bedrooms. Key considerations for 'Character Area No. 4' include, *inter alia*:

- Proposed frontage of new buildings that will address Flemington Lane and associated established residential development.
- Proposed internal streetscapes that will address the proposed new link street running along the LAP northern boundary and new internal streets.
- Provision of vehicular, pedestrian and cyclist accesses onto Flemington Lane.
- Ensuring new development does not impact upon the residential amenity of properties located on Flemington Lane to the south.
- Facilitating the western access point for the east-west active travel route through the LAP lands and connectivity with 'Character Area No. 3'.
- Accommodating a new active travel hub.
- Provision of new community floorspace.
- Retention of mature vegetation in so far as possible and appropriate replacement and augmentation to accommodate new proposals.
- Planting proposals situated on Flemington Lane.
- Provision of quality public open space including MUGA/ games recreational area.
- Incorporation of a SuDS garden.

Phasing and Implementation

The LAP requires that the phased development of the LAP lands will be undertaken in 2 no. strategic phases. This phasing approach will promote the overall development of the LAP lands in a sequential, orderly and sustainable manner. Key factors regarding the development proposed to be undertaken within each phase relate to the completion of the central active travel spine and new link street proposal during 'Phase 1'. Foul and surface water drainage critical infrastructure will be subject to agreement with Fingal County Council and Uisce Éireann. The phasing of development is subject to the participation and engagement of individual landowners/developers. The current LRD proposal is located within two phases of development identified within the LAP i.e. 'Phase 1' and 'Phase 2'.

6.0 Consultation

6.1 Section 247 Consultation

A Section 247 meeting took place between representatives of the applicant and the Planning Authority on 13th February 2026 under Fingal County Council Ref. No. LRD0081/S1. The meeting was held via Microsoft Teams. The applicant is reliant on this S.247 meeting to comply with the 'Stage 1' LRD meeting requirements.

This initial meeting related to a proposal for a larger development within the Flemington LAP lands. The proposal comprised 642 no. residential dwellings, 2 no. childcare facilities and commercial uses within a proposed local centre on a site of approx. 17.2 hectares.

As a result of the feedback issued, the proposal discussed at the Stage 2 meeting (subject to this LRD Opinion) was significantly revised.

It is considered the documents submitted for the purposes of this report reflect some, but not all, of the advice given during the 'Stage 1' LRD meeting.

The record of this meeting is included as Appendix 1 of this report, in accordance with the requirements of Article 16A(8) of the Planning and Development Regulations, 2001 (as amended).

6.2 LRD Meeting

A meeting under Section 32C of the Planning and Development Act, 2000 (as amended) (LRD Meeting) took place between representatives of the applicant and the Planning Authority via Microsoft Teams on 4th June 2026. This meeting forms the basis of this report. The main topics discussed at the meeting were:

- Principle of Development;
- Housing – Part V Delivery;
- Planning and Strategic Issues;
- Architecture Design and Layout;
- Parks and Open Space;
- Water Services;
- Transport;
- Active Travel;
- Administration.

The record of this meeting is included as Appendix 2 of this report, in accordance with the requirements of Article 16A(8) of the Planning and Development Regulations, 2001 (as amended).

6.3 Fingal County Council Internal Consultation

In accordance with Section 32B(4) of the Planning and Development Act, 2000 (as amended), in addition to the comments of the Planning & Development Department contained within this report, comments on the submitted documentation have been sought from the following departments within Fingal County Council:

- Transportation Planning Section;
- Water Services Department;
- Parks and Green Infrastructure Division;
- Housing Department;
- Architects Department;
- Active Travel Section.

Copies of the departmental reports received are included as Appendix 3 of this report.

7.0 Forming of the Opinion

The applicant submitted an extensive suite of documentation, including the information required under Article 16A(5) of the Planning and Development Regulations, 2001 (as amended), which includes drawings of the proposed development and various reports. The documentation submitted includes the following:

- Completed Application Form (Form 18);
- Archaeological Impact Assessment: Archer Heritage Planning;
- Architectural and Urban Design Statement: JFOC Architects;
- Architectural Drawings: JFOC Architects;
- Housing Quality Assessment; JFOC Architects;
- Engineering Drawings: Waterman Moylan Consulting Engineers Limited;
- Traffic and Transportation Assessment: Waterman Moylan Consulting Engineers Limited;
- Flood Risk Assessment: Waterman Moylan Consulting Engineers Limited;
- Surface Water Design Details: Waterman Moylan Consulting Engineers Limited;
- Arboricultural Report: Charles McCorkell Arboricultural Consultancy;
- Landscape Drawings: Niall Montgomery + Partners Architects;
- Tree Survey, Protection & Removal Plans: Charles McCorkell Arboricultural Consultancy;
- Daylight & Sunlight Performance & Impact Report: Solearth Design Analysis;
- Community and Social Infrastructure Audit: Stephen Ward Town Planning & Development Consultants;
- Childcare Demand Assessment: Stephen Ward Town Planning & Development Consultants;
- School Enrolment and Demand Assessment: Stephen Ward Town Planning & Development Consultants;
- Appropriate Assessment Screening: Altemar Marine & Environment Consultancy.

8.0 Opinion

Based on the information submitted by the applicant in accordance with Section 32B of the Planning and Development Act, 2000 (as amended), the proposed development falls within the definition of Large-scale Residential Development (LRD) as set out in Sections 2 and 247 of the Planning and Development Act, 2000 (as amended).

Having examined and considered the information submitted by the applicant, the reports of the Council's internal consultees, the discussions which took place at the LRD meeting, and having regard to national policy including the National Planning Framework First Revision and Section 28 Ministerial Guidelines, regional policy including the Eastern and Midland Regional Assembly RSES, and local planning policy including the Fingal Development Plan 2023-2029 and the Flemington Local Area Plan 2024; the opinion of the Planning Authority is outlined below.

The Planning Authority has considered the documentation submitted with the consultation request under Section 32B of the Planning and Development Act, 2000 (as amended) and is of the opinion that the documentation submitted does not constitute a reasonable basis on which to make an application for permission for the proposed Large-scale Residential Development.

In accordance with Section 32D(2) of the Planning and Development Act, 2000 (as amended), the areas/issues, in respect of which the documents submitted do not constitute a reasonable basis on which to make the application, are as follows:

1. The proposed development is not in accordance with the phasing requirements set out in Chapter 9 of the 2024 Flemington Local Area Plan (LAP) as the current proposal

will not deliver the central active travel spine and new link street as part of the overall development proposals brought forward in Phase 1. It is noted earlier discussions between the applicant and the Planning Authority included proposals for the development of the entire LAP lands in a more comprehensive manner. The LAP requires that both the central active travel spine and new link street are provided as part of the overall development proposals brought forward in Phase 1 and, as such, the current proposal would be contrary to the phasing requirements of the LAP.

2. The proposed development and site layout plan does not accord with the 'Proposed Flemington LAP Development Layout' detailed within Figure 3.1 of the 2024 Flemington Local Area Plan (LAP) or the requirements for 'Character Area 4' set out in Chapter 5 of the LAP by virtue of, *inter alia*: the proposals for housing on the northern and western side of the new link street; the absence of a gateway building of increased height within the western area of the site adjacent to a community facility and Active Travel Hub; the absence of community floorspace; the location of the proposed Active Travel Hub, which is not located at the western entrance to the development from the Flemington Lane. For these reasons, the proposed development and site layout plan is considered unacceptable and does not accord with the provisions of the LAP.

These aforementioned the areas/issues are set out in more detail in section 8.1 of this report.

Pursuant to Article 16A(7) of the Planning and Development Regulations, 2001 (as amended), the applicant is hereby notified that, in addition to the requirements as specified in Articles 20A, 22 and 23 of the Planning and Development Regulations, 2001 (as amended), the following should be submitted/addressed as part of any future LRD planning application that may follow:

8.1. Planning Department Requirements

Principle

- The proposed development complies with the 'RA'- 'Residential Area' land-use zoning objective attached to the site and is considered acceptable in this regard. Notwithstanding same, the applicant is advised to continue to refer to the objective, vision, and zoning use classes for the 'RA'- 'Residential Area' land-use zoning, detailed in Chapter 13 of the Fingal Development Plan 2023-2029, to ensure compliance with same and any relevant policy and objectives outlined within the Fingal Development Plan 2023-2029 and Flemington Local Area Plan (2024).

Phasing

- The proposed phasing strategy included within in the 'Architectural Urban Design Statement' document prepared by JFOC Architects has been noted; however, it is considered unacceptable as it does not accord with the requirements of Chapter 9 of the 2024 Flemington Local Area Plan (LAP). The applicant has indicated they are splitting development of the overall LAP lands into 2 no. separate LRD applications (the current proposal and a separate proposal under Ref. LRD0090 which is still awaiting to have the 'Stage 2' meeting). This strategy approach means the proposed development will not deliver the central active travel spine and new link street of the

LAP as part of the overall development proposals brought forward in Phase 1, as is required by Objective 9.1 of the LAP and as indicated in Figure 9.1 of the LAP.

The applicant is advised that any future LRD application must demonstrate its compliance with the phasing requirements of the LAP. In particular, the applicant is advised that the central active travel spine and new link street of the LAP must be delivered in full within Phase 1 of the overall development of the LAP lands as this required under the provisions of the LAP.

It is noted the same applicant has held discussions with the Planning Authority regarding a concurrent LRD proposal for development of the reminder of the LAP lands (under Ref: LRD0090 – Stage 1 meeting has been held; however, a request for the Stage 2 meeting has yet to be submitted to the Planning Authority). The concurrent proposal includes proposals for the remaining residential, communal, retail, public open space and green infrastructure, and other infrastructure required under the provisions of the LAP. In this regard, the Planning Department strongly advise the applicant to consider the submission of 1 no. coherent LRD application for the development of the overall LAP in order to ensure the development of the LAP lands is delivered in full accordance with the phasing requirements set out in Chapter 9 of the LAP. The applicant is strongly advised to reconsider their approach to developing the LAP lands.

Residential Density

The proposed net density of approx. 43 dph (net) is acceptable in the context of Section 3.3.3 and Table 3.5 of the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024) and the 2024 Flemington LAP. Notwithstanding same, the applicant is advised any future LRD application should clearly set out how the net density has been calculated (refer to Appendix B of the aforementioned Guidelines). A net site area drawing and a rational as to why each area has been discounted from the net site area should be submitted.

Residential Mix

- The proposed residential mix, consisting of 12 no. 1-bed, 33 no. 2-bed, 85 no. 3-bed and 12 no. 4-bed units, is considered acceptable in principle subject to appropriate planning and design standards being demonstrated in accordance with the Fingal Development Plan 2023-2029, the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024), the 'Design Standards for Apartments, Guidelines for Planning Authorities' (2025), and the Flemington Local Area Plan (2024).

Residential Standards

- In accordance with Objective DMSO19 of the Development Plan, any future LRD application shall clearly demonstrate, both on the submitted drawings and as part of a Housing Quality Assessment, that all proposed residential units fully comply with the gross floor area, room area and room width requirements of the 'Quality Housing for Sustainable Communities Best Practice Guidelines' (2007); SPPrs 1-4 of the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024) and SPPrs 1-8 (as applicable) and Appendix 1 of the

'Design Standards for Apartments, Guidelines for Planning Authorities' (2025). Private open space should be fully located behind the building line in accordance with Objective DMSO27 of the Development Plan.

Any future LRD application should clearly demonstrate the required separation distances set out in SPPR 1 of the 'Sustainable Residential and Compact Settlements Guidelines for Planning Authorities' (2024) are achieved. This should be indicated on the proposed site layout plan and have regard to existing development in the vicinity. Side-to-side separation distances set out in Objective DMSO26 of the current Development Plan should also be clearly indicated in the submitted drawings where applicable.

Part V Requirements

- The applicant is advised to refer to the comments of the Housing Department with regard to the proposed development's Part V requirements and the documentation required to be submitted as part of any future LRD application.

Proposed Layout

- The proposed development and site layout plan are not considered acceptable in their current format as they are not in accordance with the 'Proposed Flemington LAP Development Layout' detailed within Figure 3.1 of the 2024 Flemington Local Area Plan (LAP) or the requirements for 'Character Area 4' set out in Chapter 5 of the LAP. A number of issues, detailed below, are required to be addressed as part of any future LRD application:
 - The proposed houses along the entirety of the western and northern side of the new link road are not acceptable as this layout is not in accordance with the layout plan of 'Character Area 4' of the LAP. Additionally, the layout as proposed provides unnecessary segregation of a significant number of houses from active travel route, open spaces, and community facilities. The applicant is advised significantly revised proposals are required in this regard.
 - The proposed route of the new link street differs from that required by the LAP. Notably there are a larger quantity of units proposed to the north and west of the proposed link street than that shown on the LAP Layout, including a creche unit. The LAP shows a small number of units to the north of the link street in the centre of the site. The link street of the LAP is envisaged to form part of a Road Proposal linking three Regional Roads (R122, R127 and R132) and providing a ring-road around Balbriggan. Consequently, it is envisaged that there will be a large number of vehicle journeys on the New Link Street. Therefore, the proposed units located along the northern and western units in excess of the LAP will largely increase the number of people required to cross the link street which is envisaged to be a busy vehicular route. Consequently, the Planning Department do not support units to the north and west of the New Link Street in excess of that shown on the LAP layout. The development as proposed would not be acceptable.
 - The location of the proposed Active Travel Hub is not acceptable. Chapter 5 and Figure 5.7 of the LAP detail the location for the western access point for the east-west active travel route through the LAP lands. The applicant advised the

proposed location of the Active Travel Hub requires revision to be located closer to the western entrance of the site at the junction of the new link street and Flemington Lane as part of the design response advocated within the LAP.

- A Gateway building has not been included for within the proposed development. The LAP details that a Gateway building is required within 'Character Area 4' of the LAP lands, as per Figures 3.1 & 5.7 of the LAP. The Gateway building should be provided at a key location, adjacent community space and the Active Travel Hub as detailed within the LAP, and accommodate increased building height to mark the entrance to the LAP lands and the start of the active travel route; and to enhance the visual quality of the urban environment. The applicant is advised significantly revised proposals are required in this regard.
- No proposals for community floorspace have been submitted. The LAP details 'Character Area 4' of the LAP lands requires the provision of c.400 sq.m - c.500 sq.m of community floorspace. In this regard, the applicant is advised this community floorspace requirement is in addition to any childcare facility requirement and the Active Travel Hub. A separate community facility is required. Any proposals for community floorspace should be located adjacent to the proposed active travel hub and Gateway building on the site in accordance with the provisions of the LAP.
- The 'Proposed Flemington LAP Development Layout' detailed in Figure 3.1 of the LAP provides for strong urban frontage onto the new link street whereas the current proposal fails to achieve this due to the provision of two storey detached dwellings. This is not acceptable. The applicant is advised their proposals should be significantly revised to provide for appropriate strong urban frontage onto the new link street. This is required as part of any future LRD application.
- The location of the proposed crèche in the north-western corner of the development is unacceptable to the Planning Department. A revised proposal relocating the proposed crèche to a more appropriate location, such as adjacent to public open space, the active travel route and community facilities, and away from bends in the roads, is needed. This is required as part of any future LRD application submission.
- Further details are required regarding how the proposed development appropriately addresses Flemington Lane to the south.
- A minimum separation distance of 16m must be provided between the rear/side elevations of all buildings over one storey in height (i.e. between habitable room windows above the ground floor level in accordance with SPPR 1 of the Compact Settlement Guidelines). Rear separation distances of 14m are unacceptable, such as that proposed between House Type B1 and B2 in the centre of the site, whilst there are also concerns regarding the proximity of some units to the roadways. While design mitigation measures may be acceptable on constrained sites, the subject site is a greenfield site and it considered the provision of minimum separation distances required should readily achievable. The applicant is advised revised proposals are required to address these concerns.

- The Planning Department have significant concerns relating to the outlook/aspect and residential amenity provided within House Types B1 & B2 as these units side onto each other and the separation distances between the fronts and sides of these units is approx. 3.6m. This is not acceptable, and revised proposals are required to address these concerns.
- The application has been amended from that proposed at S1 stage with now only a portion of the Active Travel Spine being proposed to be delivered as part of this application. Currently the connectivity at this location is poor and the development as proposed would not provide satisfactory connectivity. For the proposed development to be considered acceptable to the Planning Department the entirety of the Active Travel Spine and required works to the R132 to provide the required connectivity must be included. The application red line boundary should be extended to include the entirety of the Active Travel Spine.
- Unit no. 1 is located in close proximity to the junction of Flemington Lane and New Link Street, approx. 6m from the existing road edge. This could preclude/restrict an upgrade of Flemington Lane at the southwest of the site. The section of Flemington Lane to the southwest of the site is identified on the Fingal Development Plan 2023-2029 Map Sheet No. 4 Balbriggan for a Road Proposal. The proposed Active Travel Spine and proposed unit no. 1 at the southwest corner of the site should be recessed further from the road edge and an appropriate verge provided.
- The LAP details two Active Travel Hubs. The one subject of this application is at the southwest of the site accessed off Flemington Lane and the Active Travel Spine. The submitted site layout and 3D Visualisation document show the required Active Travel Hub. This proposal is welcomed; however, sufficient detailed drawings of the Active Travel Hub have not been provided.
- There are concerns regarding the location of the proposed bungalow dwellings along the southern boundary of the site and their proximity to Flemington Lane (in terms of noise nuisance and overall residential amenity). This is considered to be a poor design response which provides for substandard levels of residential amenity. These units shall be omitted from the proposal and revised plans submitted.
- There are concerns regarding the proximity of Apartment Block A at a minimum distance of 3.380m from the eastern boundary of the site. Therefore, it is recommended that this element of proposed development is relocated further from the eastern boundary of the site.
- The Planning Department have concerns regarding the proposed parking arrangements for the duplex units which are located at a distance from each duplex unit proposed. Furthermore, some of the parking spaces will be located directly off Flemington Lane which is likely to result in issues of security, use by non-residents, and traffic/pedestrian safety. This is unacceptable. Revised car parking proposals are required to address these concerns.

- All residential blocks within the vicinity of the proposed active travel route should interact accordingly with the route as it transverses through the centre of the proposed development, with an emphasis placed on passive surveillance of the proposed travel route. Revised plans/further details are required in this regard as part of any future LRD application.
- There are concerns regarding the siting of the proposed Active Travel Hub on the southern side of the development as the Hub will be located within close proximity to Apartment Block C. These concerns relate to impacts on residential amenity with regards to noise nuisance etc. Revised proposals are required in accordance with the previous comments above relating to the location of the Active Travel Hub.
- A number of the proposed residential housing blocks include long side rear garden walls fronting internal roads and public open spaces. These should be designed out of the scheme/reduced as much as possible in their extent as part of the detailed design. Where side/rear garden walls front internal roads and public open spaces they shall be of a full brick and not render finish.
- The applicant is advised that on curtilage parking would be considered most appropriate for all housing units proposed within the development. Any LRD application should be revised to address this matter.
- Full details are required of any public facing boundary treatments proposed. Please note that boundary fencing would only be considered acceptable for use in between dwellings proposed on site.
- All gable ends facing internal roads and public open spaces shall be of a predominately brick, and not render, finish.
- All corner units shall be designed to provide dual frontage.
- The taking in charge proposal submitted would not be considered acceptable. The applicant has previously been advised that should the road network be proposed to be taken in charge, the on-street parking spaces should also be proposed to be taken in charge and shall not be designated. Alternative management company/TIC proposals can be considered for on-street parking spaces to facilitate EV charging. A revised proposal is required.

Residential Development

The Planning Department have some concerns regarding the design and internal layout of a number of the proposed units on site in particular:

- House Type A1 (2 Bed units) - having regard to the window to wall ratio along the front elevation (i.e. no ground floor window) and the location of the proposed toilet at ground level. The applicant is advised a second larger window should be included at ground level along with the relocation of the proposed ground floor toilet internally.
- House Type B1 – Is also considered problematic having regard it's design and overall layout in particular, its proposed side access, first floor windows along the side elevation and lack of first floor windows along the rear elevation. The habitable bedroom windows along the side elevation of each dwelling will provide outlook onto

the gable wall of adjacent dwellings which are generally located at a distance of 3.5m from the property which would not provide for sufficient outlook or residential amenity for future occupiers. Furthermore, the proposed dwellings would also appear to overlook the rear garden of the bungalow dwellings along the southern boundary of the site. The applicant is advised a redesign of this unit type is required in order to achieve the required 16m separation distances which will allow for rear windows to the main bedrooms.

- There are also concerns regarding the continuous nature of House Type B4 (3 Bed units) along the western area of the proposed link road. In this regard the applicant is required to provide contiguous elevations of the proposed semi-detached/terrace dwellings at this point along the proposed link road to ensure they assimilate appropriately into the development at this point.
- Internal layouts must comply with all relevant minimum space standards. In this regard, the applicant is required to submit revised proposals for Unit Type A2, B1, B2 and B3 in terms of room width, bedroom floor area and ensure all units proposed are in full compliance with Objective DMSO19 of the current Development Plan.
- The use of external staircases for access to the proposed duplex units is unacceptable due to maintenance and management issues and the poor standard of visual amenity provided. A higher architectural design response is needed. The applicant is required to submit revised proposals omitting any external staircase access in favour of internal staircases.
- Full details of the proposed finishes for each dwelling are required as part of any future LRD application. The applicant is advised that a range of materials i.e. roof tile, bricks, and render would be recommended.
- All side elevations visible from the public realm should be finished in brick.

Proposed Non-Residential Development

- The Planning Department have concerns regarding the location of the proposed crèche, which will be located directly adjacent to the northern boundary of the site and within the immediate vicinity of other residential units to the east and may pose issues relating to noise, nuisance and access. The location of the proposed crèche should be re-considered as part of any future LRD application.

The proposed crèche includes first floor windows along the eastern elevation which will directly overlook the private amenity space of the proposed dwelling to the east which is located c.11 metres from the crèche. In this regard, it is considered that the proposed crèche should be relocated to an area which is at a sufficient distance from any proposed site boundary and residential development to have any adverse impact. Full details should also be provided regarding proposed parking, drop-off, accessible parking space arrangements for the facility.

- There are also concerns regarding the design and layout of the proposed crèche (465.2sqm), having regard to the unorthodox window to wall ratio, differing pitched roof forms and lack of details provided in relation to the proposed finishes. The applicant is advised to submit a revised crèche proposal which provides for a more

symmetrical design and layout with improved window to wall ratio and full finish details provided.

- Full details of the location and provision of outdoor space should be submitted for any childcare facility proposed.
- Any future LRD application shall demonstrate the gross floor area and internal floor area of any proposed childcare facility is in compliance with the floor area standards of the 'Childcare Facilities Guidelines for Planning Authorities' (2001). The childcare facility shall cater for a range of ages as per Appendix 1 of the aforementioned Guidelines.
- Full details on the car and bicycle parking arrangements for the childcare facility, in compliance with Tables 14.17, 14.18 & 14.19 of the Fingal Development Plan 2023-2029 should be provided as part of any future LRD application. The applicant is also advised to refer to Objective DMSO79 of the Fingal Development Plan 2023-2029 for further guidance.
- Detailed plans, sections, elevations and contiguous elevations of the proposed Active Travel Hub would be required. This should include for proposed material finishes also.

Environmental Impact Assessment and Appropriate Assessment

- An Environmental Impact Assessment Report Screening and an Appropriate Assessment Screening (and, if necessary, a Natura Impact Statement), prepared by suitably qualified professionals, will be required as part of any future LRD application.

Other Matters

- The applicant has submitted a fully detailed design statement, housing quality statement and a number of other documents as part of Stage 2 submission. However, any future LRD application should also be accompanied by all relevant supporting studies required by the current Development Plan including: a Climate Action Energy Statement (Objective DMSO261); a Construction and Demolition Waste Management Plan (Objective DMSO241); School and Childcare Needs Assessment; Screening for Appropriate Assessment (Objective DMSO1) and Screening for Environmental Impact Assessment (Objective DMSO2).
- Letters of consent from respective individual landowners will be required for all works proposed on third-party lands (including works required to achieve necessary sightlines). Such letters shall clearly detail the full extent of the works required on the respective lands and not just refer to the application generally. Where necessary (e.g. cutbacks to hedgerows to achieve required sightlines) such letter shall confirm the landowner will maintain the required condition in perpetuity to the agreement of the Council.
- The following documentation, reports, and requirements of the Fingal Development Plan 2023-2029 shall be submitted/addressed as part of any future LRD application:
 - Design Statement (in accordance with the details of Objective DMSO5);
 - Housing Quality Assessment;
 - Daylight and Sunlight Assessment (Objective DMSO22);

- Building Lifecycle Report;
- Traffic and Transport Assessment;
- Stage 1 & 2 Road Safety Audits;
- DMURS Compliance Statement;
- Outline Construction Traffic Management Plan;
- Mobility Management Plan;
- Arboricultural Report & Tree Protection and Tree Removal Plans;
- Uisce Éireann Confirmation of Feasibility;
- Community and Social Infrastructure Audit (utilising the **1km** radius required under Objective DMSO78 of the current Development Plan);
- Proposals for Age-Friendly Housing (Objective DMSO37);
- Proposals for public art (Objective DMSO194);
- Proposals for public lighting;
- Proposals for playground facilities (Objectives DMSO68 & DMSO69);
- Construction and Demolition Waste Management Plan (Objective DMSO241);
- Operational Waste Management Plan;
- Climate Action Energy Statement (Objective DMSO261);
- Engineering drawings and a design report;
- Landscaping plans and a design rationale.

8.2. Architects' Department Requirements

- The following should be considered regarding architectural quality.
- The overall urban design approach is welcomed and deemed acceptable. However, several elements require further refinement, as outlined below.

Duplex Units:

- The use of externalised stairs is discouraged, as ongoing maintenance and management of externalised stairs may present challenges for residents and management companies.
- Ground floor apartment (UD) – the corridor width is <1.2m which is not ideal under UD guidelines. Additionally, some of the doors do not allow for 300mm to leading edge to allow for wheelchair access.
- First floor plan to Block A is missing in the submission.
- Parking for the Duplex units are quite far from the units and some is located off Flemington Lane which may cause issues with security and use by non-residents.

Internal Layouts & Space Standards:

- Internal layouts must comply with all relevant minimum space standards. Particular attention should be given to minimum room widths, which frequently cause compliance issues in applications. Please review the following:
 - Type A2 - living room width is < 3.6m min.
 - Type B1 – single bedroom width <2.1m min.
 - B2 – living room width < 3.8m min
 - B3 – main bedroom <13m² min

House Type A3

- L-shaped rear gardens - some rear gardens do not have good proportions and does not provide for high quality private amenity space for these units.
- Some of the units are positioned very close to Flemington Road and will not provide for a high quality and comfortable home.

House Type B1:

- The design with no windows to the rear on first floor due to the separation distance results the main bedroom being compromised in terms of daylight, with only one small window to the side gable overlooking the adjacent gable at only 3.6m separation. It is recommended to redesign this unit type to achieve the required 16m separation distances which will allow for rear windows to the main bedrooms.

Architectural Design:

- While we appreciate the design concept and the reference to Georgian architecture, we are not convinced that the current proposal's design is successful – the small windows and regular spacing should be reviewed and refined to ensure that the design is not on coherent, but also aesthetically pleasing and proving a high-quality living space to all units. We recommend that some variety in window sizes and spacing are introduced.

8.3. Housing Section Requirements (Part V Delivery)

- Developer has submitted a part V proposal to the Part V team. The part V team are reverting regarding the proposal.
- 30% of all social units should be universal design.
- 10% of the development should be age-friendly (this is not included in the 30% mentioned).
- Part V units should be a mix of typology, bed size and pepper potted around the development.

8.4. Water Services Department RequirementsSurface Water

- The surface water proposals are considered to be acceptable in principle, subject to:
 1. NBS (nature-based solutions) for rainwater management are proposed to address all 4 pillars of the SUDS principle and are generally acceptable.
 2. Details of the proposed basins (cross sections, engineering details, materials etc) should be submitted, including the proposed temporary basins to the east of the subject site.
 3. Open grate manholes within the basins should be located in the corner/low point to maximise the usable space within the basins.
 4. Poor infiltration and high-water table are noted in the submitted report. Details of ground investigation / site infiltration rates should be included with any submission.

5. Surface water calculations, modelling data/details and SW attenuation proposals, along with design details, have been provided as part of the Engineering Assessment Report and are acceptable in principle.

Flood risk

- It notes that the proposed scheme is a highly vulnerable development but is located in flood zone C. A commensurate SSFRA has been submitted to assess all potential flood risks on the subject site, including outlining mitigation measures in relation to pluvial flooding risks, and this is acceptable in principle.

8.5. Parks and Green Infrastructure Division Requirements

Existing trees and hedgerows

- The proposed development will require the removal of 2 ash trees and 1 native hedgerow, and the partial removal of four native hedgerows and one shrub group. In total, approximately 319 linear metres of native hedgerow are proposed to be removed.
- The following is required:
 - The site ecologist in association with the site landscape architect and arborist shall coordinate the Green Infrastructure Plan for the site. Based on the ecologist's guidance and recommendations, this plan shall clearly demonstrate the existing and proposed ecological corridors for this site as well as the Biodiversity Net Gain. The Green Infrastructure Plan shall clearly the how these ecological corridors function – in terms of adequate set back of development, adequate provision of space for the associated herb layer for hedgerows (in particular in relation to the Townland boundary where it meets Block). Full consideration should also be given to provision of adequate working width of a machinery (tractor mounted flail) which will be required to maintain hedgerows.

Boundary treatment

- Where private property directly adjoins areas of open space, boundary treatment in the form of a fence, wall or plinth wall and railing. Any proposed hedge planting associated with the boundary should be located within the private property line.
- The proposed boundary treatment and set back from the townland boundary needs further consideration as mentioned above in terms of the long-term retention, management and maintenance of this hedgerow.
- It is not clear how the proposed development addresses the northern and western boundaries – how does the development address the adjoining sites. A cross sections of these areas are required; demonstrate how existing vegetation and levels are dealt with.
- It is not clear how the development in general presents itself onto Flemington Lane. In this regards, cross sections should be provided to include the proposed development and the developments located on the southern side of Flemington Lane.

Public Open Space

- There are areas surrounding apartment/ duplex units which are considered part of the curtilage of these buildings which would not be acceptable as Public Open Space. In addition, there are areas around private car park space which should be incorporated within the property line of the associated residential unit. In general, clear definition between public and private is required between private and Public Open Space in the form of a wall or railing.

Play provision

- The play provision requirement for this development is 568sq metres. This should be clearly outlined on the landscape plan – it should be noted that a kickabout area is not considered part of the play provision calculation. The dimension of the MUGA should be clearly shown on the landscape plan.
- Note: 25m separation distance is required between play provision and residential units – ensure that exercise equipment is not located adjoining houses.

Incidental strips of grass

- In general, incidental open space/ grass strips should be rationalised. In this regard, incidental grass strips should be removed from one side of a road and incorporated into the other side of the road in order to increase the width of grass margins where street trees are proposed. This will allow for greater rooting volume for proposed street trees.

SuDS within grass margins and open spaces

- Cross sections are required for all SuDS areas. In relation to swales within grass margins – the sections should clearly show the proposed drainage and its interaction with proposed street trees.
- In general, the proposed open space areas appear to be dominated by SuDS leaving very limited space for general kickabout and pose significant difficulties for maintenance machinery access.
- It is advised that the applicant's Drainage consultant and Landscape Architect discuss their SuDS proposals further with Fingal's Water Services and Parks and Green Infrastructure Division prior to submission of their Stage 3 planning proposal.
- The proposed 'boardwalk' over the SuDS area should be metal.

8.6. Transportation Planning Section Requirements

General

The proposed development is located along Flemington Lane. There is an adjoining site to the east which does not form part of this S2 application but previously formed part of the S1 stage of this development. The adjoining site is located along the R132 in addition to Flemington Lane. Flemington Lane currently has a 50km/hr speed limit where it bounds the application site to the South. The R132 currently has an 80km/hr speed limit where it bounds the applicant's site to the East (not subject of this application). Multiple vehicular and active travel accesses are proposed to serve the development off

Flemington Lane (currently 50km/hr) and to facilitate future connection to the R132 (currently 80km/hr).

The application site proposes to develop a portion of land identified in the Fingal County Council Flemington Local Area Plan (LAP). However, the applicant's land holding (including the eastern site) makes up the remainder of the Flemington LAP land.

Flemington Local Area Plan (LAP) & Development Plan Balbriggan Map Sheet

The LAP highlights *"that future development proposals on the LAP lands are characterised by good urban design"*. Below is the proposed example envisaged layout illustrated in the LAP (as Figure 3.1).

3 Vision, Key Themes and Strategic Objectives



Figure 3.1: Proposed Flemington LAP Development Layout

16

Flemington Local Area Plan

A new Link Street and separate Active Travel Spine are shown linking the R132 at the east and Flemington Lane at the southwest of the site. Multiple vehicular and active travel accesses are detailed in the LAP to serve the development off Flemington Lane (currently 50km/hr) and the R132 (currently 80km/hr).

The application and the applicant's proposed site layout aims to deliver development in accordance with the LAP.

Active Travel Spine

An active travel spine is proposed through the site with a similar route shown in the LAP. The active travel spine once completed will greatly improve the connectivity for the LAP land.

However, the application has been amended from that proposed at S1 stage with now only a portion of the Active Travel Spine being proposed to be delivered as part of this application. Currently the connectivity at this location is poor. The development as proposed would not provide satisfactory connectivity. For the proposed development to

be considered acceptable to the Transportation Planning Section the entirety of the Active Travel Spine and required works to the R132 to provide the required connectivity must be included. The application red line boundary should be extended to include the entirety of the Active Travel Spine.

The active travel spine is proposed to extend further westward than that shown in the LAP which could potentially facilitate a future extension westward. This is welcomed by the Transportation Planning Section. However, the active travel abuts the road edge at the southwest corner of the site. This could preclude/restrict an upgrade of Flemington Lane at the southwest of the site. The section of Flemington Lane to the southwest of the site is identified on the Fingal Development Plan 2023-2029 Map Sheet No. 4 Balbriggan for a *Road Proposal*. The proposed Active Travel Spine and proposed unit no. 1 at the southwest corner of the site should be recessed from the road edge and an appropriate verge provided.

The width and design of the Active Travel spine shall be in accordance with the Cycle Design Manual. The desirable min. widths of 4m and 5m depending on cycle flows. The active travel spine is shown to have a width of 4m on submitted engineer's layouts. A cross-section detail of the proposed Active Travel Spine should be provided clearly showing the proposed build-up and finish.

Good connectivity at either end of the route should be provided. A suitable link to the junction of Flemington Lane/New Link Street should be considered. Pedestrian connectivity should be provided from Flemington Lane to the proposed Active Travel Spine. A pedestrian crossing on Flemington Lane should be proposed at the access to Flemington Park. Additional crossings on Flemington Lane should be considered to provide connectivity from Flemington Lane to the Active Travel Spine. This may require alterations to existing traffic calming ramps. The application includes parts of Flemington Lane. However, the proposals are unclear. Further detail should be provided. A raised table with crossing appears to be shown opposite Flemington Park on submitted layouts. However, this has not been annotated nor detailed drawing provided. Additional details of the proposed works to Flemington Lane should be provided.

The Active Travel Spine is shown on the proposed layout in a buff colour. A similar buff coloured active travel route through an LRD has recently been installed in Donabate. This would be a good comparable example for the applicant to review.



The above image was taken at the following approx. coordinates: 53.485782, -6.142281

The LAP layout shows a small number of vehicular crossing points on the Active Travel Spine. The submitted site layout has significantly reduced the number of vehicle crossing points of the Active Travel Spine from that shown at S1 stage.

New Link Street

A New Link Street is proposed along the North and West of the site.

The New Link Street layout should be designed in accordance with DMURS guidance for Link Streets; min. 2m footpaths either side of the carriageway, associated landscaping, traffic calming etc.

Map Sheet 4 of the Fingal Development Plan 2023-2029 for Balbriggan details a *Road Proposal* passing through and bounding the application site. The *Road proposal* was intended provide a ring road linking the R132 at the northeast of the application site and continuing south to the R122. This will connect to the existing and planned southwestern extension ring road serving south balbriggan, thus delivering a complete ring road of balbriggan linking all regional roads; R132 north and south of Balbriggan, R122 west of Balbriggan and R127 south of Balbriggan. Much of this *Road Proposal* south of Flemington Lane has been granted permission under planning permission reg. ref. LRD0006/S3 and additionally LRD0069/S3E (the latter is currently under appeal).

The proposed route of the New Link Street differs from that illustrated in the LAP. Notably there are a lot more units proposed to the North and West of the proposed Link Street than that shown on the LAP Layout, including a creche unit. The LAP shows a small number of units to the north of the Link Street in the centre of the site. The Link Street is envisaged to form part of a *Road Proposal* linking three Regional Roads (R122, R127 and R132) and providing a ring-road around Balbriggan. Consequently, the Transportation Planning Section envisages a large number of vehicle journeys on the New Link Street. These northern and western units in excess of the LAP will largely increase the number of people required to cross the Link Street which is envisaged to be a busy vehicular route.

Consequently, we do not support units to the north and west of the New Link Street in excess of that shown on the LAP layout. The proposal should be amended.

A Traffic Impact Assessment and Study should be provided which should outline the expected journeys on the proposed Link Street.

The LAP states:

The section of the road proposal objective within the LAP lands will provide the opportunity to deliver a new link street that will integrate with the internal street network.

It is intended for the new link street to be provided within the LAP lands with active frontage, landscaping and the provision of pedestrian and cyclist infrastructure. To avoid traffic increasing along Flemington Lane, the staggered junction should be designed to give priority to drivers along the Ring Road, thus indicating that Flemington Lane should be for local access only.

The LAP aims to provide a vehicular priority connecting the New Link Street to the granted Ring Road.

Amendments to Flemington Lane at the new proposed junction have been proposed in an effort to address the above. However, the layout is unclear. The proposed junction should be further considered and an appropriate drawing for the junction with sufficient detail provided. It appears a raised table is proposed, but this has not been annotated. Realignment works and overrun areas appear to be proposed but sufficient detail and annotation has not been provided to fully assess.

The amended layout and junction does not show the vehicle priority order outlined in the LAP. However, from review of the amended layout and junction the desired priority appears to be possible. Consideration should be given to removing the proposed STOP point on the New Link Street and including a STOP point on the western arm of Flemington Lane with the new proposed junction with appropriate traffic calming detailed.

Unit no. 1 is located in close proximity to the junction of Flemington Lane and New Link Street, approx. 6m from the existing road edge. This could preclude/restrict an upgrade of Flemington Lane at the southwest of the site. The section of Flemington Lane to the southwest of the site is identified on the Fingal Development Plan 2023-2029 Map Sheet No. 4 Balbriggan for a *Road Proposal*. The proposed Active Travel Spine and proposed unit no. 1 at the southwest corner of the site should be recessed further from the road edge and an appropriate verge provided.

The National Transport Authority welcomed the inclusion of bus stops and associated pedestrian crossings on the Ring Road on the LRD applications to the south of Flemington Lane. The applicant should consult with the NTA to determine any desire for bus stops on the New Link Street which will form part of a Ring Road. If considered appropriate by the NTA, bus stops and associated crossings should be included on the New Link Street proposal. A bus swept path analysis should be provided the New Link Street regardless.

Flemington Lane

The LAP outlines "Flemington Lane should be for local access only". A considerable portion of the applicant's perimeter bounds Flemington Lane to the south of the site. Consequently, the applicant should provide improvements/upgrades to Flemington Lane where their site bounds this road.

Flemington Lane is identified as a Secondary Route on the Balbriggan Active Travel Strategy 2024-2034 which recommends the following for Flemington Lane:

- *Provide pedestrian and cycle facilities where space allows to improve connectivity to existing and zoned residential areas.*
- *Upgrade local junctions in accordance with DMURS to provide for pedestrian and cyclist safety and priority.*

In light of the above appropriate proposals to improve connectivity along Flemington Lane at a minimum where the application site bounds Flemington Lane should be provided. Proposals for Flemington Lane not bounding the applicant's site should also be considered where feasible.

Currently Flemington Lane has multiple speed ramps to provide traffic calming. These may be required to be amended or incorporated into pedestrian crossing points on Flemington Lane to provide the connectivity outlined above.

The application includes parts of Flemington Lane. However, the proposals are unclear. Further detail should be provided. A raised table with crossing appears to be shown opposite Flemington Park on submitted layouts. However, this has not been annotated nor detailed drawing provided. Additional details of the proposed works to Flemington Lane should be provided.

To facilitate Flemington Lane becoming local access only additional/alternative traffic calming where Flemington Lane bounds the application site should be considered. Landscape buildouts may be a good alternative restricting Flemington Lane to a single carriageway lane in places requiring vehicles to yield. This could help encourage vehicles to utilise the New Link Street over Flemington Lane as envisaged by the LAP. Below is an example image:



The Transport Planning Section are available to review sketch proposals at the applicant's request.

Flemington Lane currently has a 50km/hr speed limit where it bounds the application site to the South. For Local Streets a 30km/hr speed limit is considered appropriate in accordance with DMURS. A design speed of 30km/hr should be utilised when considering proposals addressing the above. The applicant should liaise with FCC Traffic Operations and provide proposals for review demonstrating what/where speed limit reductions would be beneficial to their proposed development and the LAP aims.

A Temporary Works Speed Limit may be required to be agreed with the council prior to Construction and any works required to implement the order should be at the expense of the developer.

The phasing of works to Flemington Lane should be carefully considered and may require the New Link Street to be complete before works as proposed can be completed. Alternative temporary proposals to Flemington Lane and the proposed junction may be required until such time the New Link Street connects to the R132. Interim proposals for the road network should be provided in the absence of the New Link Street connecting to the R132.

R132

The R132 bounding the east of the applicant's site forms part of the Road Proposal identified on the Balbriggan Map Sheet of the Fingal Development Plan 2023-2029.

The R132 is identified as a Primary Route on the Balbriggan Active Travel Strategy 2024-2034 which recommends the following for the R132:

- *Transition Zone Treatment from Bremore Cottages/Cardy Rock Road to give visual cues that one is entering/leaving the Balbriggan urban area.*
- *Upgrade existing segregated cycle lanes on both sides and continue up until the proposed Gateway at Lambeeher Road / Breacan Close junction.*
- *Upgrade and widen toucan crossings*
- *Provide additional crossings to cater for desire lines, e.g. Bremore Castle & Regional Park, St. Molaga's National School.*
- *Upgrade local junctions in accordance with DMURS to provide for pedestrian and cyclist safety and priority.*
- *Reduce general traffic lane widths to c. 3m each to accommodate bus movement, and enable widening of ped / cycle facilities.*

Generally, the R132 has been provided with a two-way cycle track and footpath on the west side of the R132 in this vicinity where space has facilitated. Considering this is a new development on the west side of the R132 there should be no obstacle to providing a two-way cycle track and footpath along the west side of the R132. In light of the above appropriate proposals to improve connectivity along R132 connecting to the largely completed Active Travel upgrades on the R132 at the southeast of the site on the R132 should be provided.

The development as proposed would not provide satisfactory connectivity. For the proposed development to be considered acceptable to the Transportation Planning Section the entirety of the Active Travel Spine and required works to the R132 to provide the required connectivity must be included. The application red line boundary should be extended to include the entirety of the Active Travel Spine.

The LAP indicates one vehicular access off the R132 for the proposed New Link Street. The submitted site layout shows two vehicular accesses off the R132. The second vehicular access off the R132 should be omitted.

The R132 currently has an 80km/hr speed limit where it bounds the application site to the East. The current 80km/hr speed limit on the R132 is not appropriate for the proposed urban residential and mixed-use development fronting on to and accessing to and from the R132. For the proposed development to be considered acceptable to the Transport Planning Section the speed limit along the R132 must be reduced. A speed limit study/review for the vicinity should be carried out. The applicant should liaise with FCC Traffic Operations and provide proposals for review demonstrating what/where speed limit reductions are required to facilitate their proposed development.

A Temporary Works Speed Limit may be required to be agreed with the prior to Construction and any works required to implement the order should be at the expense of the developer.

Active Travel Hubs

The LAP details two Active Travel Hubs. The one subject of this application is at the southwest of the site accessed off Flemington Lane and the Active Travel Spine. The submitted site layout and 3D Visualisation document show the required Active Travel Hub.

This proposal is welcomed; however, sufficient detailed drawings of the Active Travel Hub have not been provided.

Application Red Line Boundary

The application red line boundary should be extended to include the required work to public roads, spaces, etc. to ensure the development can be delivered as envisaged in the LAP and outlined above.

Bicycle Parking

Provision of high quality, safe, secure and convenient bicycle parking is essential to support sustainable transport including cycling, walking and public transport. To successfully influence the choice to cycle by all, bicycle parking provision should also be supported by cycle welfare facilities and cycle repair stations. Bicycle parking facilities need to accommodate the increasing diversity of bicycles, such as cargo bikes, adapted bikes, etc. should also be provided.

In accordance with the Fingal Development Plan 2023-2029 Bicycle parking can be categorised as long-stay or short-stay and is defined as follows:

- Long-Stay Bicycle Parking: These are to be designed for private use by residents/employees. Such cycle parking spaces should be located in a secure area

that is easy to access, well-lit and covered. Effective security and functionality for all types of users is also maximised by the provision of individual facilities to allow for different types of equipment such as buggies, cargo bikes, helmets and scooters to be stored where appropriate. An adequate number of power sockets should be installed for recharging e-bikes. The spaces should be situated within the curtilage of the destination. Cargo bicycle parking should also be provided in accordance with the Cycle Design Manual (min. 5%).

- **Short-Stay Bicycle Parking:** These are designed for ease of use by the general public and visitors to a development. Such bicycle parking spaces should be located in highly visible areas with good passive surveillance, which are easy to access and well lit. They should ideally be situated no further than 15m from main entry points. Bike racks with a single wheel engagement are not acceptable. Bicycle stands should allow both the frame and wheels to be securely attached. Sheffield stands are considered appropriate for short-stay bicycle parking. Cargo bicycle parking should also be provided in accordance with the Cycle Design Manual (min. 5%).

The bicycle parking proposal should be adequately detailed for the S3 stage of the application ensuring it is prioritised over car parking where necessary.

Residential Units

The Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities requires a minimum of 1 long-stay bicycle storage space per bedroom.

Detached, semi-detached and end of terrace houses shall be provided with direct access to a private rear garden which can facilitate secure bicycle parking in accordance with Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities.

Mid-terrace dwelling which do not have direct access to a private rear garden should be provided with a front of house bicycle store for each house accommodating 1 bicycle per bedroom. Sufficient details of the front of house bicycle storage units have not been provided. The required bicycle stores do not appear possible for mid-terrace unit type B4 considering the limited front of house space. The proposal should be amended with the required bicycle parking proposed and adequately detailed.

Apartment units should be provided with appropriate bicycle stores providing sheltered and secure long-stay bicycle parking. Locations should be carefully considered and prioritised over car parking. Short-stay bicycle parking (sheffield stands) should be provided at a minimum rate of 0.5 spaces per apartment unit. Cycle repair stations should be proposed for apartment units.

The first floor apartments have been provided with a store under the external stairs. This is acceptable. The ground floor apartments have not been detailed with any secure bicycle parking. There appears to be scope to be provided alongside the proposed bin stores for the ground floor apartments. The proposal should be amended with adequate detail provided.

Non-Residential

Bicycle parking for non-residential uses such as Creche, Commercial, etc. shall be in accordance with the Fingal Development Plan 2023-2029. Table 14.17: Bicycle Parking Standards of the development plan details the required minimum quantities of spaces for both sheltered and secure long-stay spaces and short-stay spaces (sheffield stands). Cargo bicycle parking should be provided.

Table 14.17: Bicycle Parking Standards of the Fingal Development Plan details a requirement for 1 no. long-stay bicycle parking space per classroom and 5 no. short-stay bicycle parking space per classroom. Scooter parking may also be proposed and the short-stay bicycle parking may be somewhat reduced to accommodate. Scooter parking such as 'Scooterpods' are also beneficial at highlighting the potential presence of young vulnerable road users in the vicinity to uninformed motorists.

The proposed 6 classroom creche in accordance with Table 14.17: Bicycle Parking Standards of the Fingal Development Plan requires a min. 6 sheltered and secure long-stay bicycle parking spaces and 30 short-stay bicycle parking spaces (15 sheffield stands).

The submitted site layouts and floor plans for the Creche do not detail any sheltered and secure long-stay bicycle parking. The proposal should be amended to provide a secure bicycle store accommodating 6 long-stay spaces. A min. of one of these should be for a cargo bicycle.

The submitted site layouts show 18 no. sheffield stands providing 36 short-stay spaces. This is in excess of the required number of spaces for short-stay. However, no cargo bicycle parking has been provided. A min. of 2 short-stay cargo bicycle spaces should be provided i.e. one long bicycle loop. Short-stay cargo bicycle parking has recently been installed at the nearby Bremore Castle which the applicant could review. Consideration should be given to children's scooter parking. The Transportation Planning Section will consider a reduction in the required number of short-stay bicycle parking spaces should scooter parking be proposed. Colourful scooter parking such as 'Scooterpods' are also beneficial at highlighting the potential presence of young vulnerable road users in the vicinity to uninformed motorists.

Car Parking

Part of the applicant's site (east and south) is located within Zone 1 in accordance with Table 14.18: Car Parking Zones of the Fingal Development Plan 2023-2029 as it is located less than 1.6km from Balbriggan Train Station which is proposed to be upgraded to a DART Station. The western part of the site which forms this application is located in Zone 2.

Residential Units

The site is currently located within an area described as Peripheral in accordance with Table 3.8: Accessibility of the Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities. The proposed residential units each have a maximum parking demand of 2 no. car parking spaces each in accordance with SPPR 3 – Car Parking. In this instance this should include any requirement for EV parking and visitor parking.

The proposed number of car parking spaces does not exceed the maximum permitted in accordance with the Compact Settlement Guidelines.

Non-Residential

Car parking for non-residential uses such as Creche, Commercial, etc. shall be in accordance with the Fingal Development Plan 2023-2029.

Table 14.19: Bicycle Parking Standards of the Fingal Development Plan details a Norm of 0.5 parking spaces per classroom. The proposed 6 classroom creche has a parking demand of 3 parking spaces considered a norm in accordance with the Development Plan. The submitted site layout shows 3 car parking spaces serving the creche, one of which is an accessible parking space.

A small set-down area is proposed at the creche. This should be amended to be clearly one way. The central median should be amended to be grass/landscaped with a raised kerb to prevent ad-hoc parking in this area.

Accessible Car Parking

Section 14.17.8 Accessible Car Parking of the development plan requires a minimum of 5% of car parking spaces provided should be set aside for disabled car parking in non-residential developments. Accessible car parking spaces should be provided as close as reasonably possible to building entrance points and allocated and suitably sign posted for convenient access.

Provision for designated Age Friendly car parking and Parent and Child car parking provision is encouraged. These parking spaces should be provided as close as reasonably possible to building entrance points and should be allocated, sign posted and appropriately managed.

Electric Vehicle Parking

In accordance with Section 14.17.10 Electric Vehicle Parking of the development plan the proposal should provide the following:

- 20% of on-street car parking spaces for residential development should be provided with EV charging points.
- 10% of car parking spaces for non-residential development should be provided with EV charging points.
- Publicly accessible EV parking spaces should be clearly marked and be capable of communicating usage data with the National Charge Point Management System.
- EV parking spaces for accessible spaces should also be included in the development where these exist.
- A reduced number of EV parking spaces may be considered if 22kW chargers are propose in-lieu of 7kW chargers.

No proposal for EV parking has been provided. A detailed proposal for EV parking should be provided for on-street parking spaces. The application proposes many parallel on-street along the New Link Street. DMURS states a preference for parallel parking on Link Streets over perpendicular parking. Consequently, this is acceptable to the Transport

Planning Section. However, this can represent challenges for the house resident trying to charge their EV with the preferred option (cheapest) to charge from their own mains supply. Currently the Link Street proposed parallel parking spaces are shown as Taken In Charge on the submitted TIC proposal. Spaces TIC cannot be assigned and therefore personal EV chargers cannot be installed. This situation will encourage EV charging cables to be laid across the public footpath in an ad-hoc manner. Currently, local authorities have no mechanism for agreement to allow personal charger cables across public footpaths. In this instance consideration should be given to the Link Street parallel parking spaces and adjoining verge and footpath located between units and spaces being controlled by Management Company. This can enable spaces to be assigned and installation of personal EV charging equipment to be controlled.

Motorcycle Parking

Section 14.17.9 Motorcycle Parking of the development plan requires motorcycle parking spaces to be provided on the basis of one motorcycle parking bay per 10 car parking spaces for non-residential developments and apartment developments. Spaces should be provided in locations convenient to building access points, similar to cycle parking requirements. Where parking is provided within streets and spaces drop-kerbs should be provided to facilitate access to motorcycle parking bays.

Road Hierarchy

A road hierarchy drawing should be provided demonstrating a similar road hierarchy to that illustrated in the LAP.

Sightlines

Sightlines in accordance with DMURS should be demonstrated for proposed junctions. A sightline drawing should be provided. The landscape proposal should be reflective of the required sightlines and trees/plants which may obscure sightlines in the future should not be located within the required visibility splays

DMURS

A DMURS compliance statement should be provided.

The proposed shared surface details are not in accordance with DMURS. Black SMA appears to be proposed as the finish for shared surfaces. An alternative finish should be proposed. Coloured SMA is acceptable. The proposed line marking is consistent with that of a standard road and not a shared surface. Appropriate shared surface signage and line marking should be proposed for shared surfaces. Vehicle directional arrows on the surface should be omitted as the primary users are pedestrians, not cars. Some of the proposed shared streets are proposed to have what appears to be a long at grade footpath. Most notably alongside unit nos. 14 to 24. This should be broken with landscape buildouts as much as possible as elsewhere in the proposed development. Similarly, the street to the south of unit no. 51; landscape buildouts should be introduced.

The connection detail from the shared surface at unit nos. 35-36 to the Active Travel Hub is unclear. An appropriate accessible, filtered permeability treatment should be proposed preventing cars continuing.

Swept Path Analysis

Appropriate swept path analysis should be demonstrated for fire tender and refuse truck for the proposed development.

Road Safety Audit

A Stage 1 Road Safety Audit must be completed and submitted with the S3 stage of the application, to the satisfaction of the Planning Authority, in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'.

Taking In Charge

A taking in charge proposal should be provided. Previously FCC advised should the road network be proposed to be taken in charge, the on-street parking spaces should be taken in charge and shall not be designated. Alternative management company/TIC proposals can be considered for on-street parking spaces to facilitate EV charging.

Conclusion

The Transportation Planning Section recommends all comments detailed in this report should be addressed with the S3 application submissions.

The applicant should note the current 80km/hr speed limit on the R132 could preclude the development from being delivered. This speed limit will be required to be reduced.

Most notable issues recommended to be addressed by the Transportation Planning Section are (additional issues outlined above in the report):

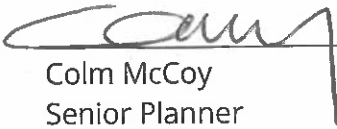
- The development as proposed would not provide satisfactory connectivity. For the proposed development to be considered acceptable to the Transportation Planning Section the entirety of the Active Travel Spine and required works to the R132 to provide the required connectivity must be included. The application red line boundary should be extended to include the entirety of the Active Travel Spine and works to the R132 linking the Active Travel Spine and the junction of Flemington Lane and the R132.
- The active travel spine is proposed to extend further westward than that shown in the LAP which could potentially facilitate a future extension westward. This is welcomed by the Transportation Planning Section. However, the active travel spine abuts the existing road edge at the southwest corner of the site. This could preclude/restrict an upgrade of Flemington Lane at the southwest of the site. The section of Flemington Lane to the southwest of the site is identified on the Fingal Development Plan 2023-2029 Map Sheet No. 4 Balbriggan for a Road Proposal. The proposed Active Travel Spine and proposed unit no. 1 at the southwest corner of the site should be recessed from the road edge and an appropriate verge provided.
- The proposed route of the New Link Street differs from that illustrated in the LAP. Notably there are a lot more units proposed to the North and West of the proposed Link Street than that shown on the LAP Layout, including a creche unit.

The LAP shows a small number of units to the north of the Link Street in the centre of the site. The Link Street is envisaged to form part of a Road Proposal linking three Regional Roads (R122, R127 and R132) and providing a ring-road around Balbriggan. Consequently, the Transportation Planning Section envisages a large number of vehicle journeys on the New Link Street. These northern and western units in excess of the LAP Layout will largely increase the number of people required to cross the Link Street which is envisaged to be a busy vehicular route. Consequently, we do not support units to the north and west of the New Link Street in excess of that shown on the LAP layout. The proposal should be amended.

- A Traffic Impact Assessment and Study should be provided which should outline the expected journeys on the proposed Link Street.
- Amendments to Flemington Lane at the new proposed junction have been proposed in an effort to address the priority envisaged by the LAP and Development Plan. However, the layout is unclear. The proposed junction should be further considered and an appropriate drawing for the junction with sufficient detail provided. It appears a raised table is proposed, but this has not been annotated. Realignment works and overrun areas appear to be proposed but sufficient detail and annotation has not been provided to fully assess.
- The amended layout and junction does not show the vehicle priority order outlined in the LAP. However, from review of the amended layout and junction the desired priority appears to be possible. Consideration should be given to removing the proposed STOP point on the New Link Street and including a STOP point on the western arm of Flemington Lane with the new proposed junction with appropriate traffic calming detailed.
- Unit no. 1 is located in close proximity to the junction of Flemington Lane and New Link Street, approx. 6m from the existing road edge. This could preclude/restrict an upgrade of Flemington Lane at the southwest of the site. The section of Flemington Lane to the southwest of the site is identified on the Fingal Development Plan 2023-2029 Map Sheet No. 4 Balbriggan for a Road Proposal. The proposed Active Travel Spine and proposed unit no. 1 at the southwest corner of the site should be recessed further from the road edge and an appropriate verge provided.
- The National Transport Authority welcomed the inclusion of bus stops and associated pedestrian crossings on the Ring Road on the LRD applications to the south of Flemington Lane. The applicant should consult with the NTA to determine any desire for bus stops on the New Link Street which will form part of a Ring Road. If considered appropriate by the NTA, bus stops and associated crossings should be included on the New Link Street proposal. A bus swept path analysis should be provided the New Link Street regardless.



Alan Fenton
Executive Planner



Colm McCoy
Senior Planner

Appendix 1 S247 Consultation

LRD - SECTION 247 PRE APPLICATION CONSULTATION NOTES

Pre Application Reference number	LRD0081/S1
Date Of Consultation	13 th February 2026
Meeting Location	Microsoft Teams
Location Of Site	Lands North of Flemington Lane, West of the R132 in the townlands of Bremore and Flemington, Balbriggan, Co. Dublin.
Prospective Applicant	Lagan Homes Balbriggan Ltd
Prospective Applicant Represented By:	John Begley - Lagan Homes Keith Somers - Lagan Homes Stephen Ward - Ward Planning Consultants Judith Horgan - Ward Planning Consultants Joe Gibbons - Waterman- Moylan Herman De Lange - NMP Landscape Architects Erin Duggan - NMP - Landscape Architects Natalie Scanlon - JFOC Architects Dominic Stevens - JFOC Architects Andrew Muldowney - Arthur Gibney and Partner Architects Eoin Reddington - Arthur Gibney and Partner Architects
Fingal County Council Represented by:	Patrick O'Connor Dara Keane Gemma Carr Annamie Pretorius Philip Grobler Shauna Hughes Trevor McGarr Breen Doris Joanne Allen Hamilton Christine Baker Donal Moriarty
Development Description	Proposed Development of: 642no. residential dwellings – 384no. houses, 258no. Apartments, 2,600sqm community space including 2 no. creches and 6,015sqm local centre Incl. retail & community uses, parking and services.
Site Zoning under Fingal County Council Development Plan	'RA'- 'Residential Area' land use with an Objective to 'Provide for new residential communities subject to the provision of the necessary social and physical infrastructure' and an Objective Vision to 'Ensure the provision of high quality new residential environments with good layout and design, with adequate public transport and cycle links and within walking distance of community facilities. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.'

Disclaimer

Please Note that advice, feedback and opinion offered at consultation is given in good faith and cannot prejudice the determination of a subsequent planning application in accordance with Section 247 of the Planning and Development Act 2000, as amended.

FEEDBACK ON PROPOSAL

Planning Department

Principle of Development:

- The proposed development complies with the 'RA'- Residential Area land use zoning objective attached to the site. Notwithstanding same, the applicant is advised to continue to refer to the objective, vision and zoning use classes for the 'RA'- Residential Area land use zoning, detailed in Chapter 13 of the Fingal Development Plan 2023-2029, to ensure compliance with same and any relevant policy and objectives outlined within the Flemington Local Area Plan (LAP).
- Furthermore, the applicant is also required to provide further details as to how the proposed commercial units comply with the 'RA' zoning objective, noting the floor area thresholds for certain uses to be provided as part of the local centre proposed.

Phasing

- The proposed Phasing Strategy included within the documentation provided has been noted and would generally be considered acceptable in principle & in accordance with the Phasing Strategy as described in Chapter 9 of the Flemington Local Area Plan. In particular, the delivery of the central active spine & link road in Phase 1 of the development. The proposed delivery of all proposed Creche / Community Hubs in Phase 2 of the development is unacceptable. At least 1 no. Creche / Community Hub should be provided in Phase 1 of the proposed development.
- Overall, the applicant is advised that a fully detailed phasing proposal providing for appropriate development of the site in accordance with the Phasing Strategy as described in Chapter 9 of the Flemington LAP would be required as part of any future LRD submission. The applicant is advised that the proposed central active spine, link road along the northern boundary and any Creche and Community facilities should mainly be delivered in Phase 1 of the proposed development.

Residential Density & Mix:

- The proposed density of approx. 42.1 dph is generally acceptable however, further details on how the net site area has been calculated in accordance with the methodology of Appendix B of the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024), should be submitted for clarity. This may be provided on a (to scale) drawing.

Building Heights

- The building heights map submitted by the applicant has been noted which includes proposals for 2 and 2+ storey buildings throughout the site.
- Clarification is required as to the exact height of all buildings greater than 2 storeys on site, this should be provided as part of a fully detailed building heights map submitted with any LRD application in future.

Part V Requirements

- The applicant is advised to liaise with the Housing Department of the Council regarding a Part V proposal and submit the required details as part of any future application. Refer to comments of the Housing Department for further details.

Proposed Residential Development

- Detailed plans, sections, elevations and contiguous elevations of all proposed houses, apartment and duplex typologies are required. These shall include for proposed material finishes also.
- All residential units shall demonstrate compliance with Objective DMS19 of the Fingal Development Plan 2023-2029 i.e. the requirements of the 'Quality Housing for Sustainable Communities Best Practice Guidelines' (2007); SPPRs 1-4 of the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024) and the 'Design Standards for Apartments, Guidelines for Planning Authorities (2025)'.
- Any future application is also required to demonstrate full compliance with Objective DMSO26 of the Fingal Development Plan 2023-2029 with regard to side-to-side separation distances.
- Further details are required on how the proposed development complies with Objective DMSO37 of the Fingal Development Plan 2023-2029 and the requirement for age friendly housing.

Proposed Non-Residential Development

- The Planning Authority would have concerns regarding the location of the 2-no. proposed creches on site which will be located within relatively close proximity of each other and existing residential properties and may pose issues relating to noise, nuisance and access. In this regard it is considered that at least 1 no. creche should be relocated to the east of the site, close to the proposed local retail centre and active travel hub. Further details should also be provided regarding proposed parking, drop-off, accessible parking space arrangements for each facility provided.
- The internal floor area of all proposed childcare facilities is required to demonstrate compliance with the floor area standards of the 'Childcare Facilities Guidelines for Planning Authorities' (2001). The childcare facility shall cater for a range of ages as per Appendix 1 of the aforementioned guidelines.
- The location and provision of outdoor space for the childcare facilities is unclear, and further details are required in this regard.
- Detailed plans, sections, elevations and contiguous elevations of the proposed Local centre, Creches, Community facilities and any Active Travel Hubs throughout the proposed site would be required. These shall include for proposed material finishes also.
- Appropriately scaled layout plans of these areas should also be provided which includes full details regarding any proposed layout, access, & parking etc.
- The provision of any new retail development shall accord with the Fingal Retail Strategy set out in Chapter 7 of the current development plan and with the scale and type of retailing identified for that location all in accordance with Objective DMSO93 & DMSO94 of the Fingal Development Plan 2023-2029.
- Any major retail proposals (exceeding 1,000 sq. m.) are required to provide a detailed Retail Impact Assessment (RIA), a Transport Impact Assessment (TIA) and Screening for Appropriate Assessment, as appropriate in accordance with Objective DMSO95 of the current Development Plan.
- Full details of bin storage, utility buildings, set down areas and parking would be required as part of any future LRD application. The applicant is advised to take cognisance of the Council's Taking in Charge standards within the design and layout of same.
- Further details on the car and bicycle parking arrangements for the childcare facility, in compliance with Tables 14.17, 14.18 & 14.19 of the Fingal Development Plan 2023-2029 are also required. The applicant is also advised to refer to Objective DMSO79 of the Fingal Development Plan 2023-2029.

- Details of bin storage, staging and set down areas for the childcare facilities should also be provided.

Proposed Site Layout

- The proposed layout of the site would generally be considered acceptable in line with the Masterplan set out in the Flemington LAP subject to appropriate planning and design standards in accordance with the Fingal Development Plan 2023-2029.
- The layout of the proposed road network would generally be considered acceptable on site and in line with the Flemington LAP. However, the Planning Authority would have concerns regarding the route of the proposed link road which will run along the northern boundary of the site as this would be considered excessively straight in its orientation and may have an adverse impact on the overall character and amenity of the proposed development. The indicative layout of the proposed link road within the Flemington LAP shows more variations in the overall road direction and layout. In this regard, the applicant is advised to carefully consider the proposed layout, alignment and any deviations as part of the proposed link road layout in accordance with the Flemington LAP. Further details are required with any future submission which include appropriately scaled drawings and design details to show that the proposed road layout will not appear excessive or have any major impact on the overall amenity of the proposed development.
- The 4 no. character areas proposed would also generally be considered acceptable in principle in line with the LAP however, further details are required in relation to the proposed finishes and overall differentiation between each character area proposed as part of any future LRD submission.
- A separate application for the development of the link road was submitted and refused previously on site under Reg ref. F25A/1028E. The applicant is advised that any proposals for a link road or other access roads on site should be included as part of any future LRD submission and not included through the submission of a separate planning application on site.
- The Planning Authority would have concerns regarding the excessive number of crossing points on the active travel spine which traverses across the centre of the proposed site. The Flemington LAP layout shows 4 no. vehicular crossing points on the Active Travel Spine whilst the proposed layout plan provided as part of this submission shows 7 no. vehicular crossing points. In this regard, the number of vehicular crossing points of the Active Travel Spine should be reduced.
- A taking in charge proposal should be provided. Should the road network be proposed to be taken in charge, the on-street parking spaces should be taken in charge and shall not be designated. This should be reflected in the proposal.
- A detailed site layout plan, indicating separation distances between all proposed buildings and structures and all existing structures in the vicinity, is required.
- All residential blocks within the vicinity of the proposed active travel route should interact accordingly with the route as it transverses through the centre of the proposed site with an emphasis on passive surveillance of the proposed travel route. Revised plans may be required to address this matter.
- A number of the proposed residential housing blocks include for long side / rear garden walls fronting internal roads and public open spaces. These should be designed out / reduced as much as possible in their extent as part of the detailed design. Where side / rear garden walls front internal roads and public open spaces they shall be of a brick and not render finish.
- Full details are required of any public facing boundary treatments proposed. Please note that boundary fencing would only be considered acceptable for use in between dwellings proposed on site.

- The Planning Authority would have concerns regarding the proposed parking arrangements for the 3 no. bedroom units located along the northern boundary of the site which appear to be served by on street parking only. In this regard, the applicant is advised that on curtilage parking would be considered most appropriate for all housing and duplex units proposed on site. Therefore, any future submission should be revised to include same.
- All gable ends facing internal roads and public open spaces shall be of a predominately brick, and not render, finish.
- All corner units shall be designed to provide for dual frontage. The inclusion of turn the corner units on corner plots would be welcomed.

Other Matters

- The applicant is advised to take full cognisance of the North Irish Sea Array ("NISA") Offshore Wind Farm Strategic Infrastructure Development (SID) which is proposed to be located on the site directly to the north of the proposed development and is currently under decision with An Coimisiún Pleanála (Reg Ref: OA29N.319866). In this regard, the proposed development as part of this application should be appropriately considered in terms of design, layout, materials etc. to ensure that the implementation of the aforementioned SID application will not have any adverse impact on the residential amenity of the development included as part of this application on site in terms of noise, disturbance and visual amenity etc. should a grant of permission be issued and the proposed development constructed. The applicant is advised to take full consideration of the aforementioned SID development before submitting any future proposals on site.
- Letters of consent from respective individual landowners will be required for all works proposed on third-party lands (including works required to achieve necessary sightlines). Such letters shall clearly detail the full extent of the works required on the respective lands and not just refer to the application generally. Where necessary (e.g. cutbacks to hedgerows to achieve required sightlines) such letter shall confirm the landowner will maintain the required condition in perpetuity to the agreement of the Council.

Community and Social Infrastructure

- The application should be accompanied by a detailed Community and Social Infrastructure Audit (utilising the 1km radius required under Objective DMS078 of the Fingal Development Plan 2023-2029) which demonstrates there is adequate social infrastructure available to serve the proposed development. Proposals for communities' facilities should be provided where shortfalls are identified. School and childcare facilities should form part of this assessment.

EIAR and AA

- Given the scale of the proposed development, an Environmental Impact Assessment Report (EIAR) is a mandatory requirement as the proposal exceed a threshold stated in Part 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended). Screening for Appropriate Assessment and, if necessary, a Natura Impact Statement should also be submitted as part of any future application.

Planning Application Documentation

- The following is a non-exhaustive list of other documentation and reports that should submitted as part of any future application:
 - A Taking in Charge Proposal is required.
 - Design Statement (Objective DMS05);
 - Housing Quality Assessment;
 - Daylight and Sunlight Assessment (Objective DMS22);
 - Building Lifecycle Report;

- Traffic and Transport Assessment;
- Stage 1& 2 Road Safety Audits;
- DMURS Compliance Statement;
- Outline Construction Traffic Management Plan;
- Mobility Management Plan;
- Archaeological Impact Assessment;
- Arboricultural Report & Tree Protection and Tree Removal Plans;
- Uisce Éireann Confirmation of Feasibility;
- Proposals for public art (Objective DMSO194);
- Proposals for public lighting;
- Construction and Demolition Waste Management (Objective DMSO241);
- Operational Waste Management Plan;
- Climate Action Energy Statement (Objective DMSO261);
- Verified Views and CGIs;
- Flood Risk Assessment;
- Engineering Services Design Report.

Housing:

- 30% of all social units should be universal design.
- 10% of the development should be age friendly (this is not included in the 30% mentioned).
- Part V units should be a mix of typology, bed size and pepper potted around the development.
- Developer to submit a formal part V proposal to the Partv@fingal.ie team directly before progressing to the next stage of planning.

Architects:

- The following should be considered regarding architectural quality.
- The overall urban design approach is broadly acceptable, and the proposed active travel/green spine represents a strong and positive feature of the scheme. However, several elements require further refinement, as outlined below.

Urban Form & Public Realm Interface

- Community Garden Area: The urban form around the community garden visually interrupts the linear open space. Consideration should be given to a revised built form to reinforce and define this space along its full length.
- Back Garden Walls on Public Open Space: Development should avoid, wherever possible, the placement of private back garden walls directly adjoining the main linear public open space. This creates a weak urban edge, reduces passive surveillance, and negatively affects the character and safety of the public realm.
- Interface with Existing Dwellings: In a few instances, the proposal places new streets or public realm directly adjoining existing residents' private open spaces. The preferred approach is for new back gardens to back onto existing back gardens, to protect privacy, amenity, and security for existing residents.

Crèche Locations

- The two proposed crèche sites are not appropriate, as both adjoin existing residential properties and may pose issues relating to noise or nuisance. At least one crèche should be located to the east of the site, close to the proposed retail and community facilities, which would better support a neighbourhood centre function. The childcare facilities should ideally be provided in Phase 1 of the development.

- Please also consider parking, drop-off arrangements and accessible parking spaces to provide a safe environment and to comply with TGD Part M requirements.

FDP 2023–2029 Objective SPQH022 – Accessible Housing:

- 30% of social housing units to be fully accessible and designed using a universal design approach, ensuring adaptability throughout the occupant's lifetime. Please ensure and demonstrate compliance by referring to guidance at: Universal Design for Homes
- A portion of the units should be fully accessible for wheelchair use i.e. level access showers etc (UD+ standard). Provide floor plans demonstrating compliance, and a map or table identifying which units are designated as accessible.

FDP 2023–2029 Objective DMSO37 – Age-Friendly Housing:

- New residential developments of over 100 units must include 10% age-friendly units. Refer to Fingal's publication "10 Ways to Create Adaptable and Age-Friendly Homes" (March 2019), along with other relevant best practice guidelines. Please provide floor plans demonstrating compliance and a map or table showing the location and number of designated age-friendly units.

Boundary Treatments, Overlooking & Privacy

- Where terraces adjoin communal or public open spaces, ensure that adequate passive surveillance is provided, boundary treatments do not block views into the public realm and privacy and amenity for the terraces are maintained without compromising visibility or safety.
- End-of-terrace dwellings should include habitable room windows overlooking public spaces to ensure strong passive surveillance.

Duplex Units:

- The use of externalised stairs is discouraged, as ongoing maintenance and management of externalised stairs may present challenges for residents and management companies.

Access to Back Gardens

- Avoid laneway access to back gardens due to long-term management and maintenance risks.
- For mid-terrace units, bin and bicycle storage should be provided within front gardens or in designated communal areas, not in rear laneways.

Internal Layouts & Space Standards

- Internal layouts must comply with all relevant minimum space standards. Particular attention should be given to minimum room widths, which frequently cause compliance issues in applications.

Transportation

General

- The proposed development is located along Flemington Lane and the R132. Flemington Lane currently has a 50km/hr speed limit where it bounds the application site to the South. The R132 currently has an 80km/hr speed limit where it bounds the application site to the East. Multiple vehicular and active travel accesses are proposed to serve the development off Flemington Lane (currently 50km/hr) and the R132 (currently 80km/hr).

- The application site proposes to develop all land identified in the Fingal County Council Flemington Local Area Plan (LAP).

Flemington Local Area Plan (LAP) & Development Plan Balbriggan Map Sheet

- The LAP highlights "that future development proposals on the LAP lands are characterised by good urban design".
- A new Link Street and separate Active Travel Spine are shown linking the R132 at the east and Flemington Lane at the southwest of the site. Multiple vehicular and active travel accesses are detailed in the LAP to serve the development off Flemington Lane (currently 50km/hr) and the R132 (currently 80km/hr).
- The application and the applicant's proposed site layout aims to deliver development in accordance with the LAP.

Active Travel Spine

- An active travel route is proposed through the site with a similar route shown in the LAP. The active travel spine proposal is welcomed. The width and design of the Active Travel spine shall be in accordance with the Cycle Design Manual. The desirable min. widths of 4m and 5m depending on cycle flows. The Radii at some points on the proposed route appear too tight/restrictive. These should be amended as per the Cycle Design Manual. Good connectivity at either end of the route should be provided. A suitable link to the junction of Flemington Lane/New Link Street should be considered. Appropriate connectivity should be proposed along the R132 to the East of the site providing access to the Active Travel Spine. This should provide connection to the largely completed Active Travel upgrades on the R132 at the southeast of the site on the R132. This may require modifications to the existing R132 alignment. Pedestrian connectivity should be provided from Flemington Lane to the proposed Active Travel Spine. A pedestrian crossing on Flemington Lane should be proposed at the access to Flemington Park. Additional crossings on Flemington Lane should be considered to provide connectivity from Flemington Lane to the Active Travel Spine. This may require alterations to existing traffic calming ramps.
- The Active Travel Spine is shown on the proposed layout in a buff colour. A similar buff coloured active travel route through an LRD has recently been installed in Donabate. This would be a good comparable example for the applicant to review.
- The LAP layout shows 4 vehicular crossing points on the Active Travel Spine. The submitted site layout shows 7 vehicular crossing points of the Active Travel Spine. The number of vehicular crossing points of the Active Travel Spine should be reduced.

New Link Street

- A New Link Street is proposed along the North and West of the site with a similar route to that shown in the LAP. The proposed route along the north of the site appears straighter than that shown in the LAP. The alignment of the New Link Street along the north of the site should be carefully considered and alignment deviations introduced similar to that shown in the LAP. The New Link Street layout should be designed in accordance with DMURS guidance for Link Streets; min. 2m footpaths either side of the carriageway, associated landscaping, traffic calming etc.
- Map Sheet 4 of the Fingal Development Plan 2023-2029 for Balbriggan details a *Road Proposal* passing through and bounding the application site. The *Road proposal* was intended provide a ring road linking the R132 at the northeast of the application site and continuing south to the R122. This will connect to the existing and planned southwestern extension ring road serving south balbriggan, thus delivering a complete ring road of balbriggan linking all regional roads; R132 north and south of Balbriggan, R122 west of Balbriggan and R127 south of Balbriggan. Much of this *Road Proposal* south of Flemington Lane has been granted

permission under planning permission reg. ref. LRD0006/S3 and is also subject of a live application reg. ref. LRD0069/S3E.

- The LAP states:

'The section of the road proposal objective within the LAP lands will provide the opportunity to deliver a new link street that will integrate with the internal street network.

It is intended for the new link street to be provided within the LAP lands with active frontage, landscaping and the provision of pedestrian and cyclist infrastructure. To avoid traffic increasing along Flemington Lane, the staggered junction should be designed to give priority to drivers along the Ring Road, thus indicating that Flemington Lane should be for local access only.'

- The LAP aims to provide a vehicular priority connecting the New Link Street to the granted Ring Road. However, given the perpendicular T junction of the New Link Street and Flemington Lane a priority flow of traffic from the New Link Street west onto Flemington Lane seems difficult to achieve without development of adjoining land outside the LAP and the application site. Nevertheless, the applicant should explore the possibility of providing traffic priority from the New Link Street west onto Flemington Lane. If this cannot be achieved within the scope of the application by the applicant, the junction of the New Link Street should still be carefully considered and favour movements to and from the Ring Road, i.e. two cars should not be able to turn left and right simultaneously from the New Link Street onto Flemington Lane.
- An appropriate signalised junction should be considered for the junction of the New Link Street and the R132. A detailed proposal should be provided.
- The National Transport Authority welcomed the inclusion of bus stops and associated pedestrian crossings on the Ring Road on the LRD applications to the south of Flemington Lane. The applicant should consult with the NTA to determine any desire for bus stops on the New Link Street which will form part of a Ring Road. If considered appropriate by the NTA, bus stops and associated crossings should be included on the New Link Street proposal.

Flemington Lane

- The LAP outlines "Flemington Lane should be for local access only". A considerable portion of the applicant's perimeter bounds Flemington Lane to the south of the site. Consequently, the applicant should provide improvements/upgrades to Flemington Lane where their site bounds this road.
- Flemington Lane is identified as a Secondary Route on the Balbriggan Active Travel Strategy 2024-2034 which recommends the following for Flemington Lane:
 - Provide pedestrian and cycle facilities where space allows to improve connectivity to existing and zoned residential areas.
 - Upgrade local junctions in accordance with DMURS to provide for pedestrian and cyclist safety and priority.
- In light of the above appropriate proposals to improve connectivity along Flemington Lane at a minimum where the application site bounds Flemington Lane. Proposals for Flemington Lane not bounding the applicant's site should also be considered where feasible.
- Currently Flemington Lane has multiple speed ramps to provide traffic calming. These may be required to be amended or incorporated into pedestrian crossing points on Flemington Lane to provide the connectivity outlined above.
- To facilitate Flemington Lane becoming local access only additional/alternative traffic calming where Flemington Lane bounds the application site should be considered. Landscape buildouts may be a good alternative restricting Flemington Lane to a single carriageway lane in places

requiring vehicles to yield. This could help encourage vehicles to utilise the New Link Street over Flemington Lane as envisaged by the LAP.

- The Transport Planning Section are available to review sketch proposals at the applicant's request.
- The LAP shows potentially 5 vehicular accesses off Flemington Lane, two of which are *cul de sac*. These consist of the New Link Street, 2 Local Streets and 2 Shared Surfaces (*cul de sac*) on the indicative road hierarchy layout. The submitted layout shows 6 vehicular accesses off Flemington Lane, none of which are *cul de sac* and 1 shared surface. The number of vehicular accesses off Flemington Lane should be reduced. The type of roads accessed off Flemington Lane should be carefully considered taking cognisance "*Flemington Lane should be for local access only*".
- Flemington Lane currently has a 50km/hr speed limit where it bounds the application site to the South. For Local Streets a 30km/hr speed limit is considered appropriate in accordance with DMURS. A design speed of 30km/hr should be utilised when considering proposals addressing the above. The applicant should liaise with FCC Traffic Operations and provide proposals for review demonstrating what/where speed limit reductions would be beneficial to their proposed development and the LAP aims.
- A Temporary Works Speed Limit may be required to be agreed with the council prior to Construction and any works required to implement the order should be at the expense of the developer.
- The phasing of works to Flemington Lane should be carefully considered and may require the New Link Street to be complete before works can be undertaken.

R132

- The R132 bounding the east of the applicant's site forms part of the Road Proposal identified on the Balbriggan Map Sheet of the Fingal Development Plan 2023-2029.
- The R132 is identified as a Primary Route on the Balbriggan Active Travel Strategy 2024-2034 which recommends the following for the R132:
 - *Transition Zone Treatment from Bremore Cottages/Cardy Rock Road to give visual cues that one is entering/leaving the Balbriggan urban area.*
 - *Upgrade existing segregated cycle lanes on both sides and continue up until the proposed Gateway at Lambrecht Road / Brecon Close junction.*
 - *Upgrade and widen toucan crossings.*
 - *Provide additional crossings to cater for desire lines, e.g. Bremore Castle & Regional Park, St. Molaga's National School.*
 - *Upgrade local junctions in accordance with DMURS to provide for pedestrian and cyclist safety and priority.*
 - *Reduce general traffic lane widths to c. 3m each to accommodate bus movement and enable widening of ped / cycle facilities.*
- Generally, the R132 has been provided with a two-way cycle track and footpath on the west side of the R132 in this vicinity where space has facilitated. Considering this is a new development on the west side of the R132 there should be no obstacle to providing a two-way cycle track and footpath along the west side of the R132. In light of the above appropriate proposals to improve connectivity along R132 connecting to the largely completed Active Travel upgrades on the R132 at the southeast of the site on the R132.

- The LAP indicates one vehicular access off the R132 for the proposed New Link Street. The submitted site layout shows two vehicular accesses off the R132. The second vehicular access off the R132 should be omitted.
- The R132 currently has an 80km/hr speed limit where it bounds the application site to the East. The current 80km/hr speed limit on the R132 is not appropriate for the proposed urban residential and mixed-use development fronting on to and accessing to and from the R132. For the proposed development to be considered acceptable to the Transport Planning Section the speed limit along the R132 must be reduced. A speed limit study/review for the vicinity should be carried out. The applicant should liaise with FCC Traffic Operations and provide proposals for review demonstrating what/where speed limit reductions are required to facilitate their proposed development.
- A Temporary Works Speed Limit may be required to be agreed with the prior to Construction and any works required to implement the order should be at the expense of the developer.

Active Travel Hubs

- The LAP details two Active Travel Hubs. One at the east of the site accessed off the R132 and the Active Travel Spine. The other is at the southwest of the site accessed off Flemington Lane and the Active Travel Route.
- The submitted site layout and masterplan presentation document show the two Active Travel Hubs in similar locations at the same links.
- This proposal is welcomed; however, no concepts have been provided offering insight as to what users of the active travel hubs can avail of. Further details and concepts of the proposed Active Travel Hubs should be provided at the S2 stage of the application with detail design provided at S3 stage. The Cycle Design Manual and the Balbriggan Active Travel Strategy 2024-2034 offer information for cycle/active travel hubs. The applicant should review case studies, and these could be used to support the proposed amenities.

Application Red Line Boundary

- The application red line boundary should be extended to include the required work to public roads, spaces, etc. to ensure the development can be delivered as envisaged in the LAP and outlined above.

Bicycle Parking

- Provision of high quality, safe, secure and convenient bicycle parking is essential to support sustainable transport including cycling, walking and public transport. To successfully influence the choice to cycle by all, bicycle parking provision should also be supported by cycle welfare facilities and cycle repair stations. Bicycle parking facilities need to accommodate the increasing diversity of bicycles, such as cargo bikes, adapted bikes, etc. should also be provided.
- In accordance with the Fingal Development Plan 2023-2029 Bicycle parking can be categorised as long-stay or short-stay and is defined as follows:
 - Long-Stay Bicycle Parking: These are to be designed for private use by residents/employees. Such cycle parking spaces should be located in a secure area that is easy to access, well-lit and covered. Effective security and functionality for all types of users is also maximised by the provision of individual facilities to allow for different types of equipment such as buggies, cargo bikes, helmets and scooters to be stored where appropriate. An adequate number of power sockets should be installed for recharging e-bikes. The spaces should be situated within the curtilage of the destination. Cargo bicycle parking should also be provided in accordance with the Cycle Design Manual (min. 5%).

- **Short-Stay Bicycle Parking:** These are designed for ease of use by the general public and visitors to a development. Such bicycle parking spaces should be located in highly visible areas with good passive surveillance, which are easy to access and well lit. They should ideally be situated no further than 15m from main entry points. Bike racks with a single wheel engagement are not acceptable. Bicycle stands should allow both the frame and wheels to be securely attached. Sheffield stands are considered appropriate for short-stay bicycle parking. Cargo bicycle parking should also be provided in accordance with the Cycle Design Manual (min. 5%).
- The bicycle parking proposal should be adequately detailed for the S2 stage of the application ensuring it is prioritised over car parking where necessary.

Residential Units

- The Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities requires a minimum of 1 long-stay bicycle storage space per bedroom.
- Detached, semi-detached and end of terrace houses shall be provided with direct access to a private rear garden which can facilitate secure bicycle parking in accordance with Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities.
- Mid-terrace dwelling which do not have direct access to a private rear garden should be provided with a front of house bicycle store for each house accommodating 1 bicycle per bedroom.
- Apartment units should be provided with appropriate bicycle stores providing sheltered and secure long-stay bicycle parking. Locations should be carefully considered and prioritised over car parking. Cargo bicycle parking should be provided. Short-stay bicycle parking (sheffield stands) should be provided at a minimum rate of 0.5 spaces per apartment unit. Cycle repair stations should be proposed for apartment units.

Non-Residential

- Bicycle parking for non-residential uses such as Creche, Commercial, etc. shall be in accordance with the Fingal Development Plan 2023-2029. Table 14.17: Bicycle Parking Standards of the development plan details the required minimum quantities of spaces for both sheltered and secure long-stay spaces and short-stay spaces (Sheffield stands). Cargo bicycle parking should be provided.

Car Parking

- Part of the site (east and south) is located with Zone 1 in accordance with Table 14.18: Car Parking Zones of the Fingal Development Plan 2023-2029 as it is located less than 1.6km from Balbriggan Train Station which is proposed to be upgraded to a DART Station.

Residential Units

- The site is currently located within an area described as Peripheral in accordance with Table 3.8: Accessibility of the Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities. The proposed residential units each have a maximum parking demand of 2 no. car parking spaces each in accordance with SPPR 3 – Car Parking. In this instance this should include any requirement for EV parking and visitor parking.

Non-Residential

- Car parking for non-residential uses such as Creche, Commercial, etc. shall be in accordance with the Fingal Development Plan 2023-2029.
- Table 14.19: Car Parking Standards of the development plan details permitted number of car parking spaces for non-residential developments.

- Non-residential buildings located towards the west of the site are located in Zone 2. Non-residential buildings located towards the east of the site are located in Zone 1 as they are less than 1.6km from Balbriggan Train Station (future DART station). The relevant standards from Table 14.19: Car Parking Standards of the development plan shall apply.

Accessible Car Parking

- Section 14.17.8 Accessible Car Parking of the development plan requires a minimum of 5% of car parking spaces provided should be set aside for disabled car parking in non-residential developments. Accessible car parking spaces should be provided as close as reasonably possible to building entrance points and allocated and suitably sign posted for convenient access.
- Provision for designated Age Friendly car parking and Parent and Child car parking provision is encouraged. These parking spaces should be provided as close as reasonably possible to building entrance points and should be allocated, sign posted and appropriately managed.

Electric Vehicle

- In accordance with Section 14.17.10 Electric Vehicle Parking of the development plan the proposal should provide the following:
 - 20% of on-street car parking spaces for residential development should be provided with EV charging points.
 - 10% of car parking spaces for non-residential development should be provided with EV charging points.
 - Publicly accessible EV parking spaces should be clearly marked and be capable of communicating usage data with the National Charge Point Management System.
 - EV parking spaces for accessible spaces should also be included in the development where these exist.
 - A reduced number of EV parking spaces may be considered if 22kW chargers are propose in-lieu of 7kW chargers.

Motorcycle Parking

- Section 14.17.9 Motorcycle Parking of the development plan requires motorcycle parking spaces to be provided on the basis of one motorcycle parking bay per 10 car parking spaces for non-residential developments and apartment developments. Spaces should be provided in locations convenient to building access points, similar to cycle parking requirements. Where parking is provided within streets and spaces drop-kerbs should be provided to facilitate access to motorcycle parking bays.

Road Hierarchy

- A road hierarchy drawing should be provided demonstrating a similar road hierarchy to that illustrated in the LAP.

Sightlines

- Sightlines in accordance with DMURS should be demonstrated for proposed junctions. A sightline drawing should be provided. The landscape proposal should be reflective of the required sightlines and trees/plants which may obscure sightlines in the future should not be located within the required visibility splays.

DMURS

- A DMURS compliance statement should be provided.

Swept Path Analysis

- Appropriate swept path analysis should be demonstrated for fire tender and refuse truck for the proposed development.

Road Safety Audit

- A Stage 1 Road Safety Audit must be completed and submitted with the S3 stage of the application, to the satisfaction of the Planning Authority, in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'.

Taking In Charge

- A taking in charge proposal should be provided. Should the road network be proposed to be taken in charge, the on-street parking spaces should be taken in charge and shall not be designated. This should be reflected in the proposal.

Traffic Impact Assessment (TIA)

- A Traffic Impact Assessment should be provided analysing the impact the proposed development will have on the surrounding road network and vice versa, demonstrating the appropriateness of the proposed road network. The TIA should assume the proposed ring road priority referred to in the LAP:

'To avoid traffic increasing along Flemington Lane, the staggered junction should be designed to give priority to drivers along the Ring Road, thus indicating that Flemington Lane should be for local access only.'

Conclusion

- The Transportation Planning Section recommends all comments detailed in this report should be addressed with the S2 and S3 application submissions.
- The applicant should note the current 80km/hr speed limit on the R132 could preclude the development from being delivered. This speed limit will be required to be reduced.

Water Services:

Water surface:

- The surface water concept is considered to be acceptable in principle, subject to:
 1. NBS (nature-based solutions) to rainwater management are preferred as it address all 4 pillars of the SUDS principle. Below ground attenuation is not desirable and generally only acceptable as a last resort. It should be endeavoured to avoid, or minimise at least, tanked attenuation.
 2. Details of ground investigation / site infiltration rates should be included with any submission. It is noted that there may be poor infiltration on site, with SW runoff observed following recent heavy rainfall.
 3. If below ground attenuation cannot be avoided, this should be in Stormtech (or similar approved equivalent) system, for Taking-in-Charge purposes. This requirement does not apply to privately managed systems.
 4. Details outlining how the above ground SLUDs garden elements and U/G attenuation areas interact to be submitted.

5. The design will need to take account of a SuDS train, ideally with surface water discharges passing through a minimum of 2 No. SuDS element to address water quality, quantity, biodiversity, and amenity.
6. Surface water calculations, modelling data/details and SW attenuation proposals, along with full design details, will need to be provided as part of any Engineering Services Report in support of any application.
7. Details of SW discharge to be provided, including any overflow / discharges from storage areas/from site should be included in any submission. No surface water is to discharge into the foul water system under any circumstances.
8. The location of any (TIC) tanks should ideally be within a public open space area, and not under areas/features where it will adversely impact landscaping or vehicle movement.
9. Further details / coordination required prior to S2 submission.

Flood risk:

- It is noted that the proposed scheme is a highly vulnerable development but is located in flood zone C. A commensurate SSFRA should be submitted with any application to cover all potential flood risks (including SW runoff issue from site currently due to heavy rain).

Parks:

Existing Trees and Hedgerows

- There are a number of existing trees and hedgerows located within this development which are worthy of retention. Objectives DMSO125 and DMSO126 of the Development Plan 2023-2029 relate to the protection of existing trees and hedgerows.

Objective DMSO125 – Management of Trees and Hedgerows

Protect, preserve and ensure the effective management of trees and groups of trees and hedgerows.

Objective DMSO126 – Protection of Trees and Hedgerows during Development

Ensure during the course of development, trees and hedgerows that are conditioned for retention are fully protected in accordance with BS5837 2012 Trees in relation to the Design, Demolition and Construction – Recommendations or as may be updated and are monitored by the appointed arboriculture consultant.

- There is an existing townland boundary located within this development. This townland should be retained in accordance with Objectives DMSO128 and DMSO172 of the Development Plan 2023-2029 which relate to townland boundaries.

Objective DMSO128 – Demarcation of Townland Boundaries

Ensure trees, hedgerows and other features which demarcate townland boundaries are preserved and incorporated where appropriate into the design of developments.

Objective DMSO172 – Protection of Historic Townland Boundaries

Avoid detrimental impacts on historic townland boundaries. Should an historic townland boundary or section thereof be impacted a survey and photographic record should be undertaken prior to removal.

- No tree survey has been provided in relation to this development.
- The following are required:

- A complete tree survey including an Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement in accordance with BS 5837: 2012, *Trees in relation to Design, Demolition and Construction Recommendations* is required. The tree survey and documents must be prepared by a suitably qualified arborist/ landscape professional.
- A Hedgerow Appraisal and management plan is required to be carried out by the site arborist and ecologist. This information will inform the quality of the trees and hedgerows in terms of biodiversity and how they can be managed or improved (e.g. by ensuring that ecological corridors are maintained, coppicing etc., recommendations on width of herb layer to be maintained at edge of hedgerow etc.)

Integrated Green Infrastructure Plan

- An Integrated Green Infrastructure Plan is required in relation to this development.
- This plan shall show existing natural features (hedgerows, significant trees, waterbodies) and the proposed green infrastructure network within the development.
- This plan shall also reference any landscape designations or site-specific Planning Objectives as shown on Green Infrastructure Sheets 14, 15 & 16 or Planning Area Sheets of the Development Plan.
- *These proposals should include:*
 - Details of existing landscape features including Townland boundaries, hedgerows, and watercourses as well as archaeology
 - Details of open space proposals
 - Riparian & ecological corridors
 - SuDS features
 - Street Trees and Tree-lined roads
 - Hedgerow management proposals (e.g. coppicing/ laying and short/ medium- and long-term management proposals in particular in terms of ash dieback, replacement proposals etc.)
 - Linkages to the surrounding open space and/or natural landscapes
 - Walking and cycling infrastructure in the area.
 - Proposed increase/decrease in tree canopy cover on the site.
- Fingal's website under 'Large Scale Residential Developments' (LRD) provides details of the documents required, and that which should be referred to at the pre-planning stage in relation to open space and green infrastructure. These required documents include an Integrated Green Infrastructure Plan. It is recommended that the applicant refer to this guidance information prior to submission of landscape proposals.

Public Open Space

The Public Open Space and Play provision requirements for this development are as follows:

	Units Total	Bedspaces Total	
3+ Bedroom Units	366	1281	
1- and 2-Bedroom Units	276	414	
Unit Total	642		
Bedspace Total	1695		
Open space requirement is 2.5 hectares per 1000 people		4.2375	ha

The Overall Public Open Space requirement for this application is		42375.00	sq.m
Net site area is	15.2000	hectares	
15% of site area is required on site to be Public Open Space	2.2800	hectares	
Contribution Calculations			
Open space requirement (hectares)	4.2375		
Provided on site (hectares)	3.8400	Class 1	Class 2
Remainder to be levied for contribution (hectares)	0.3975	0.2981	0.0994
Playground requirement (4 sq. metres per unit)	2568	Square Metres	

- Clarification is required regarding the provision of Public Open space. A thin line clearly outlining the proposed areas of Public Open Space is required, ensuring that surrounding roads / footpath are not included.
- The areas of play provision should be clearly outlined with a 25-metre separation distance clearly shown for the proposed play area and residential units (new and existing).
- In relation to any shortfall in overall Public Open Space provision, consideration shall be given to the provision of a financial contribution in respect to further improvements of the nearby Class 1 Open Space facilities at ~~Bramore~~ Park.

Public Open Space layout

- Our recommendations are as follows:
 - Omit community gardens from this development
 - Create one large open space by combining the open space with currently has a Teen Space and the open space to the east which has the pond / SuDs Garden. The proposed MUGA should be relocated here with a large play facility.

Landscape Plan

- The Root Protection Areas of trees and hedgerows shall be clearly shown on the landscape plan.
- In general, where trees / hedgerows are proposed to be retained or new trees/ hedgerows planted, consider access for large scale maintenance machinery in particular in relation to hedgerow maintenance machinery.
- Cross sections are required along the boundary to clearly show how the development interacts with the adjoining sites in order to maximise the potential of both in terms of amenity value, connectivity as well as passive supervision.
- All services (in particular SuDs features including head walls) shall be included.

Play provision plan

- A play provision plan is required clearly showing the following:
 - Area of play facility
 - Indicate inclusive equipment (including Play Pannels)
 - A minimum of 25metres separation distance to be clearly shown from residential units and play facilities located on Public Open Space

- Ensure that play provision is not located on SuDS areas.
- Good passive supervision
- Ensure that play provision is not located in SuDS features.

Taking in charge Plan

- A taking in charge plan is required including access for maintenance.

Boundary treatment

- Detailed boundary treatment plan is required. Where existing boundary treatment is proposed to be retained, a photograph of this boundary should be included. In general, ensure that there is boundary treatment provided between Public Open Space and private areas.

Street Tree Plan

- A street tree plan is required clearly showing services, lamp standards (with a minimum 7 metre separation distance between trees and lamp standards) and constructed tree pits (minimum 16 cubic metres) for trees located in hard surfaced areas, between car park spaces etc. No trees should be located along boundary walls. Emphasis to be given to the 30:20:10 rule in relation to tree selection. Where trees are proposed within front garden gardens, the rooting volume and proposed tree pit for each tree should be clearly shown. It should be noted that both the tree and tree pit should be within one property only and not divided between two properties.

SuDS on Public Open Space

- Development Plan objective DMSO204 relates to SuDS:

Objective DMSO204 – FCC SuDS Guidance Document

SuDS shall be incorporated into all parts of a development (open spaces, roads, footpaths, private areas), and have regard to the FCC SuDS Guidance Document – Green/ Blue Infrastructure for Development', as amended (Appendix 11), and shall ensure: " That the design of SuDS enhances the quality of open spaces and when included as part of any open space provision, it must contribute in a significant and positive way to the design and quality of the open space. " Open space areas shall not be dominated by SuDS features. " Underground tanked systems, whether concrete or plastic, are the least favoured means for surface water management and shall only be used when green solutions have proven not feasible. See also Appendix 11 (SuDS Guidance Document) and Chapter 11, Infrastructure and Utilities (Section 11.5.2: Surface Water and Flood Risk Management).

- The proposed SuDS features are shown in blue on the landscape plan. Clarification is required as to whether these features are intended to hold or attenuate surface water. It is important that full details of the SuDS are provided, including the location and design of all headwalls.
- In addition, slopes of 1:5 shall be maintained throughout the public open space which are to be grassed.
- Where a pond is proposed, full consideration should be given to shelving and edge planting etc.
- Cross sections of all SuDS areas are required (as opposed to 'typical cross sections').

Conclusion:

The following information is required for Stage 2:

1. A complete tree survey including an Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement in accordance with BS 5837: 2012, *Trees in relation to Design, Demolition and Construction Recommendations* is required. The tree survey and documents must be prepared by a suitably qualified arborist/ landscape professional.

2. A Hedgerow Appraisal and management plan is required to be carried out by the site arborist and ecologist. This information will inform the quality of the trees and hedgerows in terms of biodiversity and how they can be managed or improved (e.g. by ensuring that ecological corridors are maintained, coppicing etc., recommendations on width of herb layer to be maintained at edge of hedgerow etc.)
3. An Integrated Green Infrastructure Plan for the site.
4. A clear statement and plan of the Overall Public Open Space provision for this development and the On-site provision of Public Open Space and Play Provision.
5. A revised Public Open Space layout/ Landscape Master Plan is required. Please contact the Parks and Green Infrastructure Division prior to submission of this layout.
6. Play provision plan.
7. Street tree plan.
8. Boundary treatment plan.
9. Taking in charge plan.
10. SuDs proposals on Public Open Space should be discussed the Water Services and Parks and Green Infrastructure Division prior to submission.

Ecology

- Ensure baseline surveys are adequately scoped to undertake an Ecological Impact Assessment and Appropriate Assessment to meet legal requirements.
- Ensure existing biodiversity using the site is adequately protected and enhanced in line with Development Plan policies and objectives. This involves the identification of key ecological receptors and features of local to international biodiversity value including ecological corridors/green infrastructure. This will include the protection, enhancement of linear features onsite including but not limited to hedgerows and water features.
- Features that support dark corridors that act as ecological corridors/green infrastructure must be identified and protected during the design process through appropriate lighting design in line with best practice.
- Demonstrate how Biodiversity Net Gain has been achieved.
- Ensure all mitigation is designed from a site led approach and is adequately detailed to avoid any ambiguity.
- One other thing I just found in my notes was need for a tree and hedgerow appraisal was raised by someone which was to feed into landscaping and ecology.

Archaeology:

- Given the scale of the site an Archaeological Impact Assessment will be required. This should be undertaken by a suitably qualified archaeologist as per Objectives DMSO1678 and DMSO169 of the Fingal County Development Plan 2023-2029. In order to inform design/planning process the AIA should be undertaken at the earliest opportunity.

Appendix 2 LRD Meeting

LRD - SECTION 32C - LRD MEETING MINUTES

Pre Application Reference number	LRD0081/S2
Date Of Consultation	4 th June 2026
Meeting Location	Microsoft Teams
Location Of Site	Lands north of Flemington Lane (Sections of Flemington Lane are identified as Breamore Road and New, in the townlands of Breamore and FI, Balbriggan, Co. Dublin
Prospective Applicant	Lagan Homes Balbriggan Ltd
Prospective Applicant Represented By:	Judith Horgan, Stephen Ward Planning Consultant John Begley, Lagan Homes Joe Gibbons, Watermain Moylan Consulting Engineers Ian Worrell, Watermain Moylan Consulting Engineers Dominic Stevens, JFOC Architects Claire McManus, JFOC Architects Natalie Scanlon, JFOC Architects Herman De Lange, NMP Landscape Architects Erin Dibos, NMP Landscape Architects
Fingal County Council Represented by:	Patrick O'Connor, Senior Executive Planner Dara Keane, Executive Planner Annamie Pretorius, Architects Breen Doris, Active Travel Gemma Carr, Parks Marta Durek, Parks Christine Baker, Heritage Officer Trevor McGarr, Water Services Ahmed Saad, Water Services Joanne Hamilton, Ecologist Shauna Hughes, Housing James Johnson, Transport Donal Moriarty, LRD Admin
Development Description	The proposed large scale residential development (LRD) consists of 142no. dwellings in the form of 118no. houses and 24no. apartments in the following mix - 12no. 1bed, 33no. 2-bed, 85no. 3-bed and 12no. 4-bed. All housing will be one or two storey in height. Duplex apartment buildings will be three storey in height. A two storey childcare facility with play space, car parking and drop off area will be provided to support the new community that has been sized to provide for 76no.

	childcare spaces. The development will provide the first section of the Link Street as per the Flemington Local Area Plan (LAP) as well as the first section of the Active Travel Route that will form a central spine through the LAP lands which commences at a gateway pavilion fronting Flemington Lane where there will be an active travel hub. Two new vehicular access roads off Flemington Lane will serve the development. The proposal also provides for public open space including the provision of a Multi-Use Games Area (MUGA), communal open space associated with apartments, landscaping, boundary treatments, car parking, bicycle parking structures, bin storage structures, works to Flemington Lane itself, undergrounding of ESB overhead lines, infrastructure services and all other associated site development works.
Site Zoning under Fingal County Council Development Plan	

Disclaimer

Please Note that advice, feedback and opinion offered at consultation is given in good faith and cannot prejudice the determination of a subsequent planning application in accordance with Section 247 of the Planning and Development Act 2000, as amended

MEETING MINUTES

Housing:

Part V Proposal required.
Need to view Elevations of houses.
Units to be pepperpotted throughout the development.
Need for Age friendly and Disability Access friendly houses.

Water Services:

Flood Risk Assessment acceptable.
SuDs details acceptable.
High water table on site.

Parks:

Concern over potential loss of hedgerow.
Show how ecological corridor interacts with the site.
Open Space dominated by SuDs.
Important to maintain Townland Boundaries in development.
56 sq.m of play area.
Show how the Open Space interacts with Flemington Lane.

Active Travel:

Issues re taking in Charge drawings
Concerns over bike parking in certain areas of the development.

Roads:

No major issues with development.
More detailed comments will follow when Opinion is issued,

Architects:

Urban design is welcomed.
Issues over design of B1 houses.
Internal layouts must conform with minimum space standards.
External stairs to Duplexes not encouraged.
Issues with separation distances with B1 houses.

Planner:

Site is zoned RA.
Phasing proposal has been noted.
Refer to Flemington Lane LAP to ensure development follows all relevant guidelines.
Detailed separation distances between houses to be provided.
Passive surveillance across the site is needed.
Concerns over possible noise issues during development.
Parking concerns on Southern boundary.
Concerns over the design of certain house units.
B1 housing units are problematic.
Supply Contiguous Elevations in Stage 3 Application.
More details on house finishes required – brick finishes preferred.
Revise creche design.
Letter of consent from relevant landowners required at Stage 3.
More details are required over Active Travel Hub.
External staircases not to encroach on Public Space.
Be aware of how development interacts with Flemington Lane.

Appendix 3 Consultee reports

Water Services Department

See below comments in relation to Surface Water and Drainage from WSFP section regarding LRD0081 (Lands to North of Flemington Lane, Balbriggan), in relation to the S2 meeting on 4th June last.

The surface water proposals are considered to be acceptable in principle, subject to;

1. NBS (nature-based solutions) for rainwater management are proposed to address all 4 pillars of the SUDS principle and are generally acceptable.
2. Details of the proposed basins (cross sections, engineering details, materials etc) should be submitted, including the proposed temporary basins to the east of the subject site.
3. Open grate manholes within the basins should be located in the corner/low point to maximise the usable space within the basins.
4. Poor infiltration and high water table are noted in the submitted report. Details of ground investigation / site infiltration rates should be included with any submission.
5. Surface water calculations, modelling data/details and SW attenuation proposals, along with design details, have been provided as part of the Engineering Assessment Report and are acceptable in principle.

Flood risk

It notes that the proposed scheme is a highly vulnerable development but is located in flood zone C. A commensurate SSFRA has been submitted to assess all potential flood risks on the subject site, including outlining mitigation measures in relation to pluvial flooding risks, and this is acceptable in principle.

Transportation Planning Section**FINGAL COUNTY COUNCIL INTERNAL CONSULTEE****PLANNING REPORT****Report of the Transportation Planning Section**

Register Reference: LRD0081/S2

Registration Date: 13-May-2026

Development: The proposed large scale residential development (LRD) consists of 142no. dwellings in the form of 118no. houses and 24no. apartments in the following mix - 12no. 1bed, 33no. 2-bed, 85no. 3-bed and 12no. 4-bed. All housing will be one or two storey in height. Duplex apartment buildings will be three storey in height. A two storey childcare facility with play space, car parking and drop off area will be provided to support the new community that has been sized to provide for 76no. childcare spaces. The development will provide the first section of the Link Street as per the Flemington Local Area Plan (LAP) as well as the first section of the Active Travel Route that will form a central spine through the LAP lands which commences at a gateway pavilion fronting Flemington Lane where there will be an active travel hub. Two new vehicular access roads off Flemington Lane will serve the development. The proposal also provides for public open space including the provision of a Multi-Use Games Area (MUGA), communal open space associated with apartments, landscaping, boundary treatments, car parking, bicycle parking structures, bin storage structures, works to Flemington Lane itself, undergrounding of ESB overhead lines, infrastructure services and all other associated site development works.

Location: Lands north of Flemington Lane (Sections of Flemington Lane are identified as Breamore Road and New, in the townlands of Breamore and Fl, Balbriggan, Co.Dublin

Applicant: Lagan Homes Balbriggan Ltd

Application Type: LRD Pre-Application Consultation

Report

General

The proposed development is located along Flemington Lane. There is an adjoining site to the east which does not form part of this S2 application but previously formed part of the S1 stage of this development. The adjoining site is located along the R132 in addition to Flemington Lane. Flemington Lane currently has a 50km/hr speed limit where it bounds the application site to the South. The R132 currently has an 80km/hr speed limit where it bounds the applicant's site to the East (not subject of this application). Multiple vehicular and active travel accesses are proposed to serve the development off Flemington Lane (currently 50km/hr) and to facilitate future connection to the R132 (currently 80km/hr).

The application site proposes to develop a portion of land identified in the Fingal County Council Flemington Local Area Plan (LAP). However, the applicant's land holding (including the eastern site) makes up the remainder of the Flemington LAP land.

Flemington Local Area Plan (LAP) & Development Plan Balbriggan Map Sheet

The LAP highlights *"that future development proposals on the LAP lands are characterised by good urban design"*. Below is the proposed example envisaged layout illustrated in the LAP.

3 Vision, Key Themes and Strategic Objectives



Figure 3.1: Proposed Flemington LAP Development Layout

16

Flemington Local Area Plan

A new Link Street and separate Active Travel Spine are shown linking the R132 at the east and Flemington Lane at the southwest of the site. Multiple vehicular and active travel accesses are detailed in the LAP to serve the development off Flemington Lane (currently 50km/hr) and the R132 (currently 80km/hr).

The application and the applicant's proposed site layout aims to deliver development in accordance with the LAP.

Active Travel Spine

An active travel spine is proposed through the site with a similar route shown in the LAP. The active travel spine once completed will greatly improve the connectivity for the LAP land.

However, the application has been amended from that proposed at S1 stage with now only a portion of the Active Travel Spine being proposed to be delivered as part of this application. Currently the connectivity at this location is poor. The development as proposed would not provide satisfactory connectivity. For the proposed development to be considered acceptable to the Transportation Planning Section the entirety of the Active Travel Spine and required works to the R132 to provide the required connectivity must be included. The application red line boundary should be extended to include the entirety of the Active Travel Spine.

The active travel spine is proposed to extend further westward than that shown in the LAP which could potentially facilitate a future extension westward. This is welcomed by the Transportation Planning Section. However, the active travel abuts the road edge at the southwest corner of the site. This could preclude/restrict an upgrade of Flemington Lane at the southwest of the site. The section of Flemington Lane to the southwest of the site is identified on the Fingal Development Plan 2023-2029 Map Sheet No. 4 Balbriggan for a *Road Proposal*. The proposed Active Travel Spine and proposed unit no. 1 at the southwest corner of the site should be recessed from the road edge and an appropriate verge provided.

The width and design of the Active Travel spine shall be in accordance with the Cycle Design Manual. The desirable min. widths of 4m and 5m depending on cycle flows. The active travel spine is shown to have a width of 4m on submitted engineer's layouts. A cross-section detail of the proposed Active Travel Spine should be provided clearly showing the proposed build-up and finish.

Good connectivity at either end of the route should be provided. A suitable link to the junction of Flemington Lane/New Link Street should be considered. Pedestrian connectivity should be provided from Flemington Lane to the proposed Active Travel Spine. A pedestrian crossing on Flemington Lane should be proposed at the access to Flemington Park. Additional crossings on Flemington Lane should be considered to provide connectivity from Flemington Lane to the Active Travel Spine. This may require alterations to existing traffic calming ramps. The application includes parts of Flemington Lane. However, the proposals are unclear. Further detail should be provided. A raised table with crossing appears to be shown opposite Flemington Park on submitted layouts. However, this has not been annotated nor detailed drawing provided. Additional details of the proposed works to Flemington Lane should be provided.

The Active Travel Spine is shown on the proposed layout in a buff colour. A similar buff coloured active travel route through an LRD has recently been installed in Donabate. This would be a good comparable example for the applicant to review.



The above image was taken at the following approx. coordinates: 53.485782, -6.142281

The LAP layout shows a small number of vehicular crossing points on the Active Travel Spine. The submitted site layout has significantly reduced the number of vehicle crossing points of the Active Travel Spine from that shown at S1 stage.

New Link Street

A New Link Street is proposed along the North and West of the site.

The New Link Street layout should be designed in accordance with DMURS guidance for Link Streets; min. 2m footpaths either side of the carriageway, associated landscaping, traffic calming etc.

Map Sheet 4 of the Fingal Development Plan 2023-2029 for Balbriggan details a *Road Proposal* passing through and bounding the application site. The *Road proposal* was intended provide a ring road linking the R132 at the northeast of the application site and continuing south to the R122. This will connect to the existing and planned southwestern extension ring road serving south balbriggan, thus delivering a complete ring road of balbriggan linking all regional roads; R132 north and south of Balbriggan, R122 west of Balbriggan and R127 south of Balbriggan. Much of this *Road Proposal* south of Flemington Lane has been granted permission under planning permission reg. ref. LRD0006/S3 and additionally LRD0069/S3E (the latter is currently under appeal).

The proposed route of the New Link Street differs from that illustrated in the LAP. Notably there are a lot more units proposed to the North and West of the proposed Link Street than that shown on the LAP Layout, including a creche unit. The LAP shows a small number of units to the north of the Link Street in the centre of the site. The Link Street is envisaged to form part of a *Road Proposal* linking three Regional Roads (R122, R127 and R132) and providing a ring-road around Balbriggan. Consequently, the Transportation Planning Section envisages a large number of vehicle journeys on the New Link Street.

These northern and western units in excess of the LAP will largely increase the number of people required to cross the Link Street which is envisaged to be a busy vehicular route. Consequently, we do not support units to the north and west of the New Link Street in excess of that shown on the LAP layout. The proposal should be amended.

A Traffic Impact Assessment and Study should be provided which should outline the expected journeys on the proposed Link Street.

The LAP states:

The section of the road proposal objective within the LAP lands will provide the opportunity to deliver a new link street that will integrate with the internal street network.

It is intended for the new link street to be provided within the LAP lands with active frontage, landscaping and the provision of pedestrian and cyclist infrastructure. To avoid traffic increasing along Flemington Lane, the staggered junction should be designed to give priority to drivers along the Ring Road, thus indicating that Flemington Lane should be for local access only.

The LAP aims to provide a vehicular priority connecting the New Link Street to the granted Ring Road.

Amendments to Flemington Lane at the new proposed junction have been proposed in an effort to address the above. However, the layout is unclear. The proposed junction should be further considered and an appropriate drawing for the junction with sufficient detail provided. It appears a raised table is proposed, but this has not been annotated. Realignment works and overrun areas appear to be proposed but sufficient detail and annotation has not been provided to fully assess.

The amended layout and junction does not show the vehicle priority order outlined in the LAP. However, from review of the amended layout and junction the desired priority appears to be possible. Consideration should be given to removing the proposed STOP point on the New Link Street and including a STOP point on the western arm of Flemington Lane with the new proposed junction with appropriate traffic calming detailed.

Unit no. 1 is located in close proximity to the junction of Flemington Lane and New Link Street, approx. 6m from the existing road edge. This could preclude/restrict an upgrade of Flemington Lane at the southwest of the site. The section of Flemington Lane to the southwest of the site is identified on the Fingal Development Plan 2023-2029 Map Sheet No. 4 Balbriggan for a *Road Proposal*. The proposed Active Travel Spine and proposed unit no. 1 at the southwest corner of the site should be recessed further from the road edge and an appropriate verge provided.

The National Transport Authority welcomed the inclusion of bus stops and associated pedestrian crossings on the Ring Road on the LRD applications to the south of Flemington Lane. The applicant should consult with the NTA to determine any desire for bus stops on the New Link Street which will form part of a Ring Road. If considered appropriate by

the NTA, bus stops and associated crossings should be included on the New Link Street proposal. A bus swept path analysis should be provided the New Link Street regardless.

Flemington Lane

The LAP outlines "Flemington Lane should be for local access only". A considerable portion of the applicant's perimeter bounds Flemington Lane to the south of the site. Consequently, the applicant should provide improvements/upgrades to Flemington Lane where their site bounds this road.

Flemington Lane is identified as a Secondary Route on the Balbriggan Active Travel Strategy 2024-2034 which recommends the following for Flemington Lane:

- *Provide pedestrian and cycle facilities where space allows to improve connectivity to existing and zoned residential areas.*
- *Upgrade local junctions in accordance with DMURS to provide for pedestrian and cyclist safety and priority.*

In light of the above appropriate proposals to improve connectivity along Flemington Lane at a minimum where the application site bounds Flemington Lane should be provided. Proposals for Flemington Lane not bounding the applicant's site should also be considered where feasible.

Currently Flemington Lane has multiple speed ramps to provide traffic calming. These may be required to be amended or incorporated into pedestrian crossing points on Flemington Lane to provide the connectivity outlined above.

The application includes parts of Flemington Lane. However, the proposals are unclear. Further detail should be provided. A raised table with crossing appears to be shown opposite Flemington Park on submitted layouts. However, this has not been annotated nor detailed drawing provided. Additional details of the proposed works to Flemington Lane should be provided.

To facilitate Flemington Lane becoming local access only additional/alternative traffic calming where Flemington Lane bounds the application site should be considered. Landscape buildouts may be a good alternative restricting Flemington Lane to a single carriageway lane in places requiring vehicles to yield. This could help encourage vehicles to utilise the New Link Street over Flemington Lane as envisaged by the LAP. Below is an example image:



The Transport Planning Section are available to review sketch proposals at the applicant's request.

Flemington Lane currently has a 50km/hr speed limit where it bounds the application site to the South. For Local Streets a 30km/hr speed limit is considered appropriate in accordance with DMURS. A design speed of 30km/hr should be utilised when considering proposals addressing the above. The applicant should liaise with FCC Traffic Operations and provide proposals for review demonstrating what/where speed limit reductions would be beneficial to their proposed development and the LAP aims.

A Temporary Works Speed Limit may be required to be agreed with the council prior to Construction and any works required to implement the order should be at the expense of the developer.

The phasing of works to Flemington Lane should be carefully considered and may require the New Link Street to be complete before works as proposed can be completed. Alternative temporary proposals to Flemington Lane and the proposed junction may be required until such time the New Link Street connects to the R132. Interim proposals for the road network should be provided in the absence of the New Link Street connecting to the R132.

R132

The R132 bounding the east of the applicant's site forms part of the Road Proposal identified on the Balbriggan Map Sheet of the Fingal Development Plan 2023-2029.

The R132 is identified as a Primary Route on the Balbriggan Active Travel Strategy 2024-2034 which recommends the following for the R132:

- *Transition Zone Treatment from Bremore Cottages/Cardy Rock Road to give visual cues that one is entering/leaving the Balbriggan urban area.*
- *Upgrade existing segregated cycle lanes on both sides and continue up until the proposed Gateway at Lambreecher Road / Breacan Close junction.*
- *Upgrade and widen toucan crossings*

- *Provide additional crossings to cater for desire lines, e.g. Bremore Castle & Regional Park, St. Molaga's National School.*
- *Upgrade local junctions in accordance with DMURS to provide for pedestrian and cyclist safety and priority.*
- *Reduce general traffic lane widths to c. 3m each to accommodate bus movement, and enable widening of ped / cycle facilities.*

Generally, the R132 has been provided with a two-way cycle track and footpath on the west side of the R132 in this vicinity where space has facilitated. Considering this is a new development on the west side of the R132 there should be no obstacle to providing a two-way cycle track and footpath along the west side of the R132. In light of the above appropriate proposals to improve connectivity along R132 connecting to the largely completed Active Travel upgrades on the R132 at the southeast of the site on the R132 should be provided.

The development as proposed would not provide satisfactory connectivity. For the proposed development to be considered acceptable to the Transportation Planning Section the entirety of the Active Travel Spine and required works to the R132 to provide the required connectivity must be included. The application red line boundary should be extended to include the entirety of the Active Travel Spine.

The LAP indicates one vehicular access off the R132 for the proposed New Link Street. The submitted site layout shows two vehicular accesses off the R132. The second vehicular access off the R132 should be omitted.

The R132 currently has an 80km/hr speed limit where it bounds the application site to the East. The current 80km/hr speed limit on the R132 is not appropriate for the proposed urban residential and mixed-use development fronting on to and accessing to and from the R132. For the proposed development to be considered acceptable to the Transport Planning Section the speed limit along the R132 must be reduced. A speed limit study/review for the vicinity should be carried out. The applicant should liaise with FCC Traffic Operations and provide proposals for review demonstrating what/where speed limit reductions are required to facilitate their proposed development.

A Temporary Works Speed Limit may be required to be agreed with the prior to Construction and any works required to implement the order should be at the expense of the developer.

Active Travel Hubs

The LAP details two Active Travel Hubs. The one subject of this application is at the southwest of the site accessed off Flemington Lane and the Active Travel Spine. The submitted site layout and 3D Visualisation document show the required Active Travel Hub.

This proposal is welcomed; however, sufficient detailed drawings of the Active Travel Hub have not been provided.

Application Red Line Boundary

The application red line boundary should be extended to include the required work to public roads, spaces, etc. to ensure the development can be delivered as envisaged in the LAP and outlined above.

Bicycle Parking

Provision of high quality, safe, secure and convenient bicycle parking is essential to support sustainable transport including cycling, walking and public transport. To successfully influence the choice to cycle by all, bicycle parking provision should also be supported by cycle welfare facilities and cycle repair stations. Bicycle parking facilities need to accommodate the increasing diversity of bicycles, such as cargo bikes, adapted bikes, etc. should also be provided.

In accordance with the Fingal Development Plan 2023-2029 Bicycle parking can be categorised as long-stay or short-stay and is defined as follows:

- Long-Stay Bicycle Parking: These are to be designed for private use by residents/employees. Such cycle parking spaces should be located in a secure area that is easy to access, well-lit and covered. Effective security and functionality for all types of users is also maximised by the provision of individual facilities to allow for different types of equipment such as buggies, cargo bikes, helmets and scooters to be stored where appropriate. An adequate number of power sockets should be installed for recharging e-bikes. The spaces should be situated within the curtilage of the destination. Cargo bicycle parking should also be provided in accordance with the Cycle Design Manual (min. 5%).
- Short-Stay Bicycle Parking: These are designed for ease of use by the general public and visitors to a development. Such bicycle parking spaces should be located in highly visible areas with good passive surveillance, which are easy to access and well lit. They should ideally be situated no further than 15m from main entry points. Bike racks with a single wheel engagement are not acceptable. Bicycle stands should allow both the frame and wheels to be securely attached. Sheffield stands are considered appropriate for short-stay bicycle parking. Cargo bicycle parking should also be provided in accordance with the Cycle Design Manual (min. 5%).

The bicycle parking proposal should be adequately detailed for the S3 stage of the application ensuring it is prioritised over car parking where necessary.

Residential Units

The Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities requires a minimum of 1 long-stay bicycle storage space per bedroom.

Detached, semi-detached and end of terrace houses shall be provided with direct access to a private rear garden which can facilitate secure bicycle parking in accordance with Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities.

Mid-terrace dwelling which do not have direct access to a private rear garden should be provided with a front of house bicycle store for each house accommodating 1 bicycle per bedroom. Sufficient details of the front of house bicycle storage units have not been provided. The required bicycle stores do not appear possible for mid-terrace unit type B4 considering the limited front of house space. The proposal should be amended with the required bicycle parking proposed and adequately detailed.

Apartment units should be provided with appropriate bicycle stores providing sheltered and secure long-stay bicycle parking. Locations should be carefully considered and prioritised over car parking. Short-stay bicycle parking (sheffield stands) should be provided at a minimum rate of 0.5 spaces per apartment unit. Cycle repair stations should be proposed for apartment units.

The first floor apartments have been provided with a store under the external stairs. This is acceptable. The ground floor apartments have not been detailed with any secure bicycle parking. There appears to be scope to be provided alongside the proposed bin stores for the ground floor apartments. The proposal should be amended with adequate detail provided.

Non-Residential

Bicycle parking for non-residential uses such as Creche, Commercial, etc. shall be in accordance with the Fingal Development Plan 2023-2029. Table 14.17: Bicycle Parking Standards of the development plan details the required minimum quantities of spaces for both sheltered and secure long-stay spaces and short-stay spaces (sheffield stands). Cargo bicycle parking should be provided.

Table 14.17: Bicycle Parking Standards of the Fingal Development Plan details a requirement for 1 no. long-stay bicycle parking space per classroom and 5 no. short-stay bicycle parking space per classroom. Scooter parking may also be proposed and the short-stay bicycle parking may be somewhat reduced to accommodate. Scooter parking such as 'Scooterpods' are also beneficial at highlighting the potential presence of young vulnerable road users in the vicinity to uninformed motorists.

The proposed 6 classroom creche in accordance with Table 14.17: Bicycle Parking Standards of the Fingal Development Plan requires a min. 6 sheltered and secure long-stay bicycle parking spaces and 30 short-stay bicycle parking spaces (15 sheffield stands).

The submitted site layouts and floor plans for the Creche do not detail any sheltered and secure long-stay bicycle parking. The proposal should be amended to provide a secure bicycle store accommodating 6 long-stay spaces. A min. of one of these should be for a cargo bicycle.

The submitted site layouts show 18 no. sheffield stands providing 36 short-stay spaces. This is in excess of the required number of spaces for short-stay. However, no cargo bicycle parking has been provided. A min. of 2 short-stay cargo bicycle spaces should be provided i.e. one long bicycle loop. Short-stay cargo bicycle parking has recently been installed at the nearby Bremore Castle which the applicant could review. Consideration should be given to children's scooter parking. The Transportation Planning Section will consider a reduction in the required number of short-stay bicycle parking spaces should

scooter parking be proposed. Colourful scooter parking such as 'Scooterpods' are also beneficial at highlighting the potential presence of young vulnerable road users in the vicinity to uninformed motorists.

Car Parking

Part of the applicant's site (east and south) is located within Zone 1 in accordance with Table 14.18: Car Parking Zones of the Fingal Development Plan 2023-2029 as it is located less than 1.6km from Balbriggan Train Station which is proposed to be upgraded to a DART Station. The western part of the site which forms this application is located in Zone 2.

Residential Units

The site is currently located within an area described as Peripheral in accordance with Table 3.8: Accessibility of the Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities. The proposed residential units each have a maximum parking demand of 2 no. car parking spaces each in accordance with SPPR 3 – Car Parking. In this instance this should include any requirement for EV parking and visitor parking.

The proposed number of car parking spaces does not exceed the maximum permitted in accordance with the Compact Settlement Guidelines.

Non-Residential

Car parking for non-residential uses such as Creche, Commercial, etc. shall be in accordance with the Fingal Development Plan 2023-2029.

Table 14.19: Bicycle Parking Standards of the Fingal Development Plan details a Norm of 0.5 parking spaces per classroom. The proposed 6 classroom creche has a parking demand of 3 parking spaces considered a norm in accordance with the Development Plan. The submitted site layout shows 3 car parking spaces serving the creche, one of which is an accessible parking space.

A small set-down area is proposed at the creche. This should be amended to be clearly one way. The central median should be amended to be grass/landscaped with a raised kerb to prevent ad-hoc parking in this area.

Accessible Car Parking

Section 14.17.8 Accessible Car Parking of the development plan requires a minimum of 5% of car parking spaces provided should be set aside for disabled car parking in non-residential developments. Accessible car parking spaces should be provided as close as reasonably possible to building entrance points and allocated and suitably sign posted for convenient access.

Provision for designated Age Friendly car parking and Parent and Child car parking provision is encouraged. These parking spaces should be provided as close as reasonably possible to building entrance points and should be allocated, sign posted and appropriately managed.

Electric Vehicle Parking

In accordance with Section 14.17.10 Electric Vehicle Parking of the development plan the proposal should provide the following:

- 20% of on-street car parking spaces for residential development should be provided with EV charging points.
- 10% of car parking spaces for non-residential development should be provided with EV charging points.
- Publicly accessible EV parking spaces should be clearly marked and be capable of communicating usage data with the National Charge Point Management System.
- EV parking spaces for accessible spaces should also be included in the development where these exist.
- A reduced number of EV parking spaces may be considered if 22kW chargers are propose in-lieu of 7kW chargers.

No proposal for EV parking has been provided. A detailed proposal for EV parking should be provided for on-street parking spaces. The application proposes many parallel on-street along the New Link Street. DMURS states a preference for parallel parking on Link Streets over perpendicular parking. Consequently, this is acceptable to the Transport Planning Section. However, this can represent challenges for the house resident trying to charge their EV with the preferred option (cheapest) to charge from their own mains supply. Currently the Link Street proposed parallel parking spaces are shown as Taken In Charge on the submitted TIC proposal. Spaces TIC cannot be assigned and therefore personal EV chargers cannot be installed. This situation will encourage EV charging cables to be laid across the public footpath in an ad-hoc manner. Currently, local authorities have no mechanism for agreement to allow personal charger cables across public footpaths. In this instance consideration should be given to the Link Street parallel parking spaces and adjoining verge and footpath located between units and spaces being controlled by Management Company. This can enable spaces to be assigned and installation of personal EV charging equipment to be controlled.

Motorcycle Parking

Section 14.17.9 Motorcycle Parking of the development plan requires motorcycle parking spaces to be provided on the basis of one motorcycle parking bay per 10 car parking spaces for non-residential developments and apartment developments. Spaces should be provided in locations convenient to building access points, similar to cycle parking requirements. Where parking is provided within streets and spaces drop-kerbs should be provided to facilitate access to motorcycle parking bays.

Road Hierarchy

A road hierarchy drawing should be provided demonstrating a similar road hierarchy to that illustrated in the LAP.

Sightlines

Sightlines in accordance with DMURS should be demonstrated for proposed junctions. A sightline drawing should be provided. The landscape proposal should be reflective of the

required sightlines and trees/plants which may obscure sightlines in the future should not be located within the required visibility splays.

DMURS

A DMURS compliance statement should be provided.

The proposed shared surface details are not in accordance with DMURS. Black SMA appears to be proposed as the finish for shared surfaces. An alternative finish should be proposed. Coloured SMA is acceptable. The proposed line marking is consistent with that of a standard road and not a shared surface. Appropriate shared surface signage and line marking should be proposed for shared surfaces. Vehicle directional arrows on the surface should be omitted as the primary users are pedestrians, not cars. Some of the proposed shared streets are proposed to have what appears to be a long at grade footpath. Most notably alongside unit nos. 14 to 24. This should be broken with landscape buildouts as much as possible as elsewhere in the proposed development. Similarly, the street to the south of unit no. 51; landscape buildouts should be introduced.

The connection detail from the shared surface at unit nos. 35-36 to the Active Travel Hub is unclear. An appropriate accessible, filtered permeability treatment should be proposed preventing cars continuing.

Swept Path Analysis

Appropriate swept path analysis should be demonstrated for fire tender and refuse truck for the proposed development.

Road Safety Audit

A Stage 1 Road Safety Audit must be completed and submitted with the S3 stage of the application, to the satisfaction of the Planning Authority, in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'.

Taking In Charge

A taking in charge proposal should be provided. Previously FCC advised should the road network be proposed to be taken in charge, the on-street parking spaces should be taken in charge and shall not be designated. Alternative management company/TIC proposals can be considered for on-street parking spaces to facilitate EV charging.

Conclusion

The Transportation Planning Section recommends all comments detailed in this report should be addressed with the S3 application submissions.

The applicant should note the current 80km/hr speed limit on the R132 could preclude the development from being delivered. This speed limit will be required to be reduced.

Most notable issues recommended to be addressed by the Transportation Planning Section are (additional issues outlined above in the report):

- The development as proposed would not provide satisfactory connectivity. For the proposed development to be considered acceptable to the Transportation Planning Section the entirety of the Active Travel Spine and required works to the R132 to provide the required connectivity must be included. The application red line boundary should be extended to include the entirety of the Active Travel Spine and works to the R132 linking the Active Travel Spine and the junction of Flemington Lane and the R132.
- The active travel spine is proposed to extend further westward than that shown in the LAP which could potentially facilitate a future extension westward. This is welcomed by the Transportation Planning Section. However, the active travel spine abuts the existing road edge at the southwest corner of the site. This could preclude/restrict an upgrade of Flemington Lane at the southwest of the site. The section of Flemington Lane to the southwest of the site is identified on the Fingal Development Plan 2023-2029 Map Sheet No. 4 Balbriggan for a Road Proposal. The proposed Active Travel Spine and proposed unit no. 1 at the southwest corner of the site should be recessed from the road edge and an appropriate verge provided.
- The proposed route of the New Link Street differs from that illustrated in the LAP. Notably there are a lot more units proposed to the North and West of the proposed Link Street than that shown on the LAP Layout, including a creche unit. The LAP shows a small number of units to the north of the Link Street in the centre of the site. The Link Street is envisaged to form part of a Road Proposal linking three Regional Roads (R122, R127 and R132) and providing a ring-road around Balbriggan. Consequently, the Transportation Planning Section envisages a large number of vehicle journeys on the New Link Street. These northern and western units in excess of the LAP Layout will largely increase the number of people required to cross the Link Street which is envisaged to be a busy vehicular route. Consequently, we do not support units to the north and west of the New Link Street in excess of that shown on the LAP layout. The proposal should be amended.
- A Traffic Impact Assessment and Study should be provided which should outline the expected journeys on the proposed Link Street.
- Amendments to Flemington Lane at the new proposed junction have been proposed in an effort to address the priority envisaged by the LAP and Development Plan. However, the layout is unclear. The proposed junction should be further considered and an appropriate drawing for the junction with sufficient detail provided. It appears a raised table is proposed, but this has not been annotated. Realignment works and overrun areas appear to be proposed but sufficient detail and annotation has not been provided to fully assess.
- The amended layout and junction does not show the vehicle priority order outlined in the LAP. However, from review of the amended layout and junction the desired priority appears to be possible. Consideration should be given to removing the proposed STOP point on the New Link Street and including a STOP point on the western arm of Flemington Lane with the new proposed junction with appropriate traffic calming detailed.

- Unit no. 1 is located in close proximity to the junction of Flemington Lane and New Link Street, approx. 6m from the existing road edge. This could preclude/restrict an upgrade of Flemington Lane at the southwest of the site. The section of Flemington Lane to the southwest of the site is identified on the Fingal Development Plan 2023-2029 Map Sheet No. 4 Balbriggan for a Road Proposal. The proposed Active Travel Spine and proposed unit no. 1 at the southwest corner of the site should be recessed further from the road edge and an appropriate verge provided.

The National Transport Authority welcomed the inclusion of bus stops and associated pedestrian crossings on the Ring Road on the LRD applications to the south of Flemington Lane. The applicant should consult with the NTA to determine any desire for bus stops on the New Link Street which will form part of a Ring Road. If considered appropriate by the NTA, bus stops and associated crossings should be included on the New Link Street proposal. A bus swept path analysis should be provided the New Link Street regardless.

Parks and Green Infrastructure Division

**FINGAL COUNTY COUNCIL INTERNAL CONSULTEE
PLANNING REPORT
Report of Parks and Green Infrastructure Division**

Register Reference: LRD0081/S2

Registration Date: 08-Dec-2025

Development: Masterplan Area: 642no. residential dwellings - 384no. houses, 258no. apartments

Phase 1: 316no. residential dwellings - 203no. houses, 113no. apartments

Phase 1A 154no. residential dwellings - All houses

Phase 1B 162no. residential dwellings - 49no. houses, 113no. apartments

Phase 2: 326no. residential dwellings - 181 no. houses, 145no. apartments

Community Floorspace (including 2no. creche): 2,600sq.m

Commercial (Local Centre): Ground floor, Retail entrance area (415 sq.m), Shop units (650 sq.m), Car parking and Services areas (2000 sq.m)

Total Ground Floor Area: 3,065 sq.m., First Floor Area: 2,950 sq.m., Local Centre Total Area: 6,015 sq.m.

Location: Lands North Of Flemington Lane, Townlands of Bremore & Flemington, Balbriggan, Co Dublin

Applicant: Lagan Homes Balbriggan Ltd

Application Type: LRD Pre-Application Consultation

Report

Existing trees and hedgerows

The proposed development will require the removal of 2 ash trees and 1 native hedgerow, and the partial removal of four native hedgerows and one shrub group. In total, approximately 319 linear metres of native hedgerow are proposed to be removed.

The following is required:

The site ecologist in association with the site landscape architect and arborist shall coordinate the Green Infrastructure Plan for the site. Based on the ecologist's guidance and recommendations, this plan shall clearly demonstrate the existing and proposed ecological corridors for this site as well as the Biodiversity Net Gain. The Green Infrastructure Plan shall clearly the how these ecological corridors function - in terms of adequate set back of development, adequate provision of space for the associated herb layer for hedgerows (in particular in relation to the Townland boundary where it meets Block). Full consideration should also be given to provision of adequate working width of a machinery (tractor mounted flail) which will be required to maintain hedgerows.

Boundary treatment

Where private property directly adjoins areas of open space, boundary treatment in the form of a fence, wall or plinth wall and railing. Any proposed hedge planting associated with the boundary should be located within the private property line.

The proposed boundary treatment and set back from the townland boundary needs further consideration as mentioned above in terms of the long-term retention, management and maintenance of this hedgerow.

It is not clear how the proposed development addresses the northern and western boundaries – how does the development address the adjoining sites. A cross sections of these areas are required; demonstrate how existing vegetation and levels are dealt with.

It is to clear how the development in general presents itself onto Flemington Lane. In this regards, cross sections should be provided to include the proposed development and the developments located on the southern side of Flemington Lane.

Public Open Space:

There are areas surrounding apartment/ duplex units which are considered part of the curtilage of these buildings which would not be acceptable as Public Open Space. In addition, there are areas around private car park space which should be incorporated within the property line of the associated residential unit. In general, clear definition between public and private is required between private and Public Open Space in the form of a wall or railing.

Play provision

The play provision requirement for this development is 568sq metres. This should be clearly outlined on the landscape plan – it should be noted that a kickabout area is not considered part of the play provision calculation. The dimension of the MUGA should be clearly shown on the landscape plan.

Note: 25m separation distance is required between play provision and residential units – ensure that exercise equipment is not located adjoining houses.

Incidental strips of grass

In general, incidental open space/ grass strips should be rationalised. In this regard, incidental grass strips should be removed from one side of a road and incorporated into the other side of the road in order to increase the width of grass margins where street trees are proposed. This will allow for greater rooting volume for proposed street trees.

SuDs within grass margins and open spaces

Cross sections are required for all SuDS areas. In relation to swales within grass margins – the sections should clearly show the proposed drainage and its interaction with proposed street trees.

In general, the proposed open space areas appear to be dominated by SuDS leaving very limited space for general kickabout and pose significant difficulties for maintenance machinery access.

It is advised that the applicant's Drainage consultant and Landscape Architect discuss their SuDS proposals further with Fingal's Water Services and Parks and Green Infrastructure Division prior to submission of their Stage 3 planning proposal.

The proposed 'boardwalk' over the SuDs area should be metal.

Conclusion:

It is advised that the applicant's Drainage consultant and Landscape Architect discuss their SuDs proposals further with Fingal's Water Services and Parks and Green Infrastructure Division prior to submission of their Stage 3 planning proposal.

Architects Department**FINGAL COUNTY COUNCIL INTERNAL CONSULTEE
PLANNING REPORT – ARCHITECTS DEPARTMENT****Section 32B LRD Meeting for LRD0081 – Lands to the North of
Flemington Lane, Balbriggan, Co. Dublin.****ARCHITECTS DEPARTMENT NOTES**

The following should be considered regarding architectural quality.

The overall urban design approach is welcomed and deemed acceptable. However, several elements require further refinement, as outlined below.

Duplex Units:

The use of externalised stairs is discouraged, as ongoing maintenance and management of externalised stairs may present challenges for residents and management companies.

- Ground floor apartment (UD) – the corridor width is <1.2m which is not ideal under UD guidelines. Additionally, some of the doors do not allow for 300mm to leading edge to allow for wheelchair access.
- First floor plan to Block A is missing in the submission
- Parking for the Duplex units are quite far from the units and some is located off Flemington Lane which may cause issues with security and use by non-residents.

Internal Layouts & Space Standards:

Internal layouts must comply with all relevant minimum space standards. Particular attention should be given to minimum room widths, which frequently cause compliance issues in applications. Please review the following:

- Type A2 - living room width is < 3.6m min.
- Type B1 – single bedroom width <2.1m min.
- B2 – living room width < 3.8m min
- B3 – main bedroom <13m² min

House Type A3

L-shaped rear gardens - some rear gardens do not have good proportions and does not provide for high quality private amenity space for these units.

Some of the units are positioned very close to Flemington Road and will not provide for a high quality and comfortable home.

House Type B1:

The design with no windows to the rear on first floor due to the separation distance results the main bedroom being compromised in terms of daylight, with only one small window to the side gable overlooking the adjacent gable at only 3.6m separation. It is recommended to redesign this unit type to achieve the required 16m separation distances which will allow for rear windows to the main bedrooms.

Architectural Design:

While we appreciate the design concept and the reference to Georgian architecture, we are not convinced that the current proposal's design is successful – the small windows and regular spacing should be reviewed and refined to ensure that the design is not only coherent, but also aesthetically pleasing and providing a high-quality living space to all units. We recommend that some variety in window sizes and spacing are introduced.

Housing Department

- Developer has submitted a part V proposal to the Part V team. The part V team are reverting regarding the proposal.
- 30% of all social units should be universal design.
- 10% of the development should be age friendly (this is not included in the 30% mentioned).
- Part V units should be a mix of typology, bed size and pepper potted around the development.