

# Statement of Consistency

For a Strategic Housing Development at  
Ballymacaula, Drumbiggle, Keelty, Circular Road,  
Ennis, Co. Clare

on behalf of Glenveagh Homes Ltd

August 2022



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CHARTERED PLANNING CONSULTANTS

# Document Control Sheet

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# 1. Introduction

## 1.1 Context

This Statement of Consistency has been prepared by McCutcheon Halley Chartered Planning Consultants, in conjunction with Deady Gahan Architects, Tobin Consulting Engineers and Doyle & O'Troithigh Landscape Architects on behalf of Glenveagh Homes Ltd., to accompany a planning application for a Strategic Housing Development application at Ballymacaula, Drumbiggie, Circular Road, Ennis, Co. Clare.

The proposed development consists of following:

1. The construction of 289 no. residential units comprising a mixture of 12 no. 1 bed apartments, 78 no. 2 bed townhouse/duplex units, 165 no. 3 bed dwelling houses, and 34 no. dwelling houses which will have an option of a 3 or 4 bedroom house-type;
2. A 400.7m<sup>2</sup> creche/childcare facility;
3. The provision of landscaping, open space and amenity areas, including play/exercise equipment, a linear amenity walkway, informal play areas and local play areas;
4. The provision 2 no. pedestrian connections to the existing public footpath along the N85, 2 no. pedestrian connections into Ballymacaula View Estate, improvements/upgrades to the pedestrian footpaths along Circular Road including an uncontrolled pedestrian crossing and pedestrian footpath provision along part of the Drumbiggie and Cahercalla Roads;
5. All associated infrastructure and services including 1 no. vehicular access point onto Circular Road, car parking and bin storage, lighting, 2 no. ESB substations, drainage and 1 pumping station, boundary treatments at Ballymacaula, Drumbiggie, Circular Road, Ennis, Co. Clare.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) has been prepared in respect of the proposed development.

This report provides a statement of consistency with the relevant planning policy documents at national and local levels. The statement addresses the relevant policy documents individually, assessing consistency with principles and relevant objectives in a matrix form. The cover letter considers compliance with policies based on relevant themes which emerge from relevant guidelines and policy documents.

Section 2 of this report reviews the following national and regional planning policy documents:

- 2.1 *Project Ireland 2040: National Planning Framework (2018)*;
- 2.2 *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)*;
- 2.3 *Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)* (May 2009), Department of Environment, Heritage and Local Government;

- 2.4 *Urban Design Manual – A Best Practice Guide* (UDM) 2009, Department of Environment, Heritage and Local Government;
- 2.5 *Design Manual for Urban Roads and Streets* (DMURS) 2013, Department of Transport, Tourism and Sport;
- 2.6 *2018 Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities*, 2018, Department of Housing, Planning and Local Government;
- 2.7 *The Planning System and Flood Risk Management Guidelines, - Guidelines for Planning Authorities, November 2009*, Department of the Environment, Community and Local Government;
- 2.8 *Childcare Facilities Guidelines*, June 2001;
- 2.9 *Urban Development and Building Height Guidelines*, Department of Housing, Local Government and Heritage, 2018.

Section 3 of this report addresses the following Local Planning Policy documents:

- 3.1 *Clare County Development Plan (CDP) 2017 and Volume 3a Ennis Municipal District*.

## 1.2 Summary Statement of Consistency

This report provides a statement of consistency for the proposed development at Ballymacaula, Drumbiggle, Circular Road, Ennis, Co. Clare, with reference to the relevant national and local planning policy documents, as detailed in Section 1.1

The layout has been informed by detailed review of the site and assessment of the requirements of national, regional, and local planning policy to ensure that it is in compliance with policy objectives.

This section summarises compliance with planning policy on the following themes, incorporating the 12 design principles set out in the Urban Design Manual.

### 1.2.1 Context

The proposed development is located within the townland of Ballymacaula within Ennis town which is identified as a hub town in the Clare County Development Plan 2017. The subject site is situated to the west of the N85 (Ennis By Pass) is approximately 1.4km from Ennis Town Centre. The total site area comprises 11.32ha (27.97 acres) hectares. The net developable area of the site is 8.9 ha. There are a number of existing one-off houses located immediately east of the subject site and to the northeast of the site lies the Ennis Golf Club.

The site is within easy walking distance of a number of commercial, recreational and community facilities including local shops, Ennis golf course, Ennis Showgrounds and local schools. The site is bounded to the north/north west by the N85 and a new residential development is located to the south west of the site. The native hedgerows which define the existing field boundaries and are part of the local green infrastructure network will be

retained where possible. The site will be accessed via the Circular Road which runs to the southeast of the site.



Figure 1 Site Location at Ballymacaula, Drumbiggle, Circular Road, Ennis, Co. Clare.

### 1.2.2 Density and Housing Mix

The proposed development provides for a mix of unit types and sizes and the mix achieves density levels consistent with national planning guidelines. The mix of unit types and sizes is also consistent with national planning policy guidelines to create a sustainable neighbourhood and balanced community, by facilitating a range of household types within the development.

The majority of the site is subject to the zoning objective for 'low density residential' which seeks a low-density pattern (15 units per hectare) of residential development, primarily detached family dwellings to ensure the character of the settlement is maintained. National Planning Guidelines states that Suburban / Greenfield sites in larger towns should provide densities of between 30-50 units per hectare. The proposed net density of the site is 32.5 units per hectare, consistent with national planning guidelines and local planning policy objectives.

Section 5.11 of the *2009 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)* states that for town centre sites there should, in principle, be no upper limit on the number of dwellings that may be provided, subject to the following safeguards:

- compliance with the policies and standards of public and private open space adopted by development plans;

- avoidance of undue adverse impact on the amenities of existing or future adjoining neighbours;
- good internal space standards of development;
- conformity with any vision of the urban form of the town or city as expressed in development plans, particularly in relation to height or massing;
- recognition of the desirability of preserving protected buildings and their settings and of preserving or enhancing the character or appearance of an Architectural Conservation Area; and
- compliance with plot ratio and site coverage standards adopted in development plans.

For 'Outer Suburban / Greenfield sites' (defined as open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary facilities, schools, shops and employment and community facilities), the greatest efficiency in land usage will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally and that net densities less than 30 dwellings per hectare should generally be discouraged.

#### **Statement of Consistency: DENSITY**

**An overall residential density of 32.5 units per hectare has been achieved in accordance with Section 5.11 of the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) May 2009*. The low density residential zoning outlined in the Clare County Development Plan 2017 does not reflect the delivery of sustainable development and consolidation of settlement as provided in national policy such as the NPF. The proposed development is consistent with National Policy such as the National Planning Framework and Guidelines for Planning Authorities; Sustainable Residential Development in Urban Areas (2009)**

Within the zoning objective, the CDP envisages a residential development of 'primarily detached family dwellings'. The proposed housing mix comprises of 34 no. 3/4 semi-detached houses, 165 no. 3 bed dwelling houses/townhouses, 78 no. 2 bed townhouses and apartments and 12 no. 1 bed apartments through 11 different unit types and sizes that will appeal to a broad range of purchasers. The unit's range in size from 54sqm to 145.8sqm. The variety of units proposed focus on providing choice, affordability and quality housing in accordance with the relevant policies.

### **1.2.3 Layout**

#### **Connectivity**

The proposed development is set around a wide network of streets, interlinked pedestrian and cyclists' pathways and open spaces. The site is

served by a single vehicular access which is provided onto the Circular Road. The proposed development has been designed to accommodate cyclists and pedestrians with the inclusion of an amenity walkway to the northwest of the site and potential future connections to the wider area. It should be noted that there is car parking provided for residential units and the creche as part of the proposed development. The development also allows for visitor car parking spaces with each home having adequate storage areas for bicycles.

The planned pedestrian routes tie into the existing paths with two no. pedestrian paths located to the south west of the site connecting to the new residential development. An additional walkway is provided to the east of the site providing 2 no. pedestrian connections to the N85 and the development provides internal paths providing a connection onto Circular Road. All footpath, shared cycle facilities are interconnected within the site create a vast amount of inter-connectivity for the proposed development.

As part of the development, improvements/upgrades to the pedestrian footpaths along Circular Road including an uncontrolled pedestrian crossing and pedestrian footpath provision along part of the Drumbiggle and Cahercalla Roads.

### Inclusivity

The proposed dwellings offer a broad range of accommodation choice, in terms of both unit size and configuration. This variety will be attractive to a range of individuals and families. The design and layout of the proposed development will meet the requirements of all relevant documents, in particular Part M of the Technical Guidance Documents which deals with accessibility and inclusivity. In this regard, the design of the proposed development is also guided by the principles of universal design. The proposed scheme has been designed so that it can be accessed and used to the greatest extent possible by all people regardless of their age, size, ability or desirability.

With regard to the proposed amenity spaces, each space has been developed to suit children of varying ages, teenagers, adults and seniors, where relevant. All areas, whether public, private or communal, will be well defined and accessible to all, encouraging the use of the public realm by the community. All buildings are designed and sited to provide passive surveillance of the public realm, including streets, paths and open spaces.

### Distinctiveness

A distinct and recognisable scheme is proposed through the architectural and design treatment of the form, fenestration proposed finishes of the development. The proposed development contains a mix of mainly semi-detached, shallow units, townhouses and apartments/duplexes. The proposed design and layout of the development will complement existing surrounding development within the area but be sufficiently individual to promote its own sense of place.

## Parking

Car parking is provided on site with each 1 bed apartment and 2 bed duplex and townhouse having access to 1 no. on curtilage space. All corner units, semi-detached units and end of terrace units will have access to 2 no. car parking spaces either within the driveway of the dwellings or within close proximity to the front door, equating to 488 no. car parking spaces. The development also provide 4 no. disabled spaces and 16 no visitor spaces, therefore the total no. of spaces for the residential development is 508 no. car spaces. Appendix 1 of the Clare County Development Plan 2017 requires the provision of a minimum of 1 space per 1 and 2 bed unit and 2 spaces for >3 bed unit and 1 visitor space per 3 residential units. 1 visitor spaces per 3 residential with consideration to the 289 no. residential units proposed would suggest the provision of 96 no. visitor spaces. A total of 16 no. visitor car parking spaces are provided for residential units and this is considered adequate given the sites encouragement to promote and encourage modal choice for future occupants with options of walking and cycling. All parking areas will be overlooked. A material contravention statement is also included with this SHD application to address the reduces parking provision to the standards set out in the Clare Development Plan.

Adequate bicycle storage will also be provided within the proposed scheme. A bike store has been provided outside the proposed creche and bike storage has been provided for mid-townhouses where there is no direct garden access.

A total of 519 no. parking spaces are provided throughout the scheme, including 11 no. vehicle spaces and 2 no. motorcycle spaces for the creche and 16 no. visitor car parking spaces. We consider the level of parking provided to be appropriate in the context of the delivery of housing in Ennis.

## Detailed Design

The proposed development has been carefully designed to create an unmistakable identity for distinctive character areas and good quality open spaces encouraging social interaction. The variety in the mix of housing units had to reflect the densities envisaged, as well as market demand to ensure

### Statement of Consistency: LAYOUT

**The layout and design of the proposed development is based on the principles and 12 design criteria of the Urban Design Manual and a detailed Design Statement is submitted with the SHD application. The proposed apartments have been designed having regard to and are consistent with *2018 Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities*. Overall, a high-quality layout and design has been achieved based on the provision of a mix of high quality apartments in a quality neighbourhood area and through the creation of a sustainable extension to the settlement of Ennis which prioritises pedestrians and cyclists.**

the economic viability of the scheme. Careful consideration has been given to an appropriate palette of materials that reflects the aesthetics and functionality of individual housing units.

#### 1.2.4 Landscape and Amenity

##### Public Realm

The proposed scheme is designed around a network of streets, pathways and open spaces that are of a high quality, which provide an attractive public realm for both future residents and visitors to the site. The residential clusters are located near the open spaces which will increase the likelihood of being used and provides an invaluable extension to their private open space within their residential units. These streets and spaces are overlooked by the surrounding residences and enhanced by corner units which will foster a sense of ownership amongst the community. The play areas as illustrated in the landscaping plan are sited where they will benefit from passive surveillance and these spaces act as a continuation of the private residences, there is still a clear definition between public, semi-private and private space.

##### Privacy and Amenity

The proposed layout has been designed to ensure that each residential unit within the development will have a high standard of residential amenity and privacy. This has been achieved by carefully locating, orientating and positioning each dwelling and also by providing generous separation distances between residential units. Where possible, all dwellings benefit from a separation distance of 22m. Where this separation distance is reduced, special design measures are incorporated to ensure that the amenity of future residents is not negatively impacted. Windows are not facing, sited to prevent direct overlooking into adjacent dwellings and private gardens.

Generous rear gardens are also provided throughout the development, which meet the guidelines set out for minimum rear garden sizes and have been orientated to maximise solar exposure. All homes will have adequate storage areas and areas for sorting of recyclables.

#### **Statement of Consistency: LANDSCAPE AND AMENITY**

**The landscape and amenity provisions of the proposed development are based on the principles and criteria of the Urban Design Manual and a detailed Design Statement is submitted with the SHD application. The proposed apartments have been designed having regard to and are consistent with *2018 Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities*. Overall high-quality landscaping and amenity areas have been provided which will help create an attractive development for residents to reside.**

## 1.2.5 Sustainability

### Efficiency

With consideration to the gross site area, the actual developable area of the site, the zoning requirements and general design requirements, the design seeks to strike an appropriate balance between achieving the required densities alongside open space requirements to ensure that the zoned land is used efficiently, whilst quality of environment and place is retained. Higher densities have been achieved in the form of apartments and townhouses units which have appropriately sites to provide a mix of unit type and sizes throughout the scheme.

## 2. National Planning Policy

This section looks at consistency with the following National and Regional Policy Documents:

- Project Ireland 2040: National Planning Framework (2018);
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016);
- Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) (May 2009), Department of Environment, Heritage and Local Government;
- Urban Design Manual – A Best Practice Guide (UDM) 2009, Department of Environment, Heritage and Local Government;
- Design Manual for Urban Roads and Streets (DMURS) 2013, Department of Transport, Tourism and Sport;
- 2018 Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2018, Department of Housing, Planning and Local Government;
- Childcare Facilities Guidelines, June 2001; and
- The Planning System and Flood Risk Management;
- Urban Development and Building Heights, 2018.

### 2.1 Project Ireland 2040 – National Planning Framework

The National Planning Framework (NPF) was launched in 2018 and is the Government's strategic plan for "*shaping the future growth and development of our country out to the year 2040*". The National Planning Framework 2040 (NPF) established strong growth targets for Ireland and sets a new policy framework to deliver compact urban development, with at least 50% of all future population and employment growth to be focused on the existing five cities and their suburbs

| Reference | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
|-----------|--|---|
| 3a        | Deliver at least 40% of all new homes nationally, within the built-up envelope of existing urban settlements.  | <ul style="list-style-type: none"> <li>✓ The proposed development is located on a greenfield site within the urban settlement of Ennis and is therefore in accordance with Objective 3a.</li> </ul>   |
| 4         | Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.  | <ul style="list-style-type: none"> <li>✓ The proposed development will create a high-quality residential development which integrates with the existing established residential communities of the surrounding areas.</li> <li>✓ The proposed development will provide a hierarchy of open spaces and landscaped areas.</li> <li>✓ The proposed development will meet the needs of workers in Ennis where currently there is an undersupply of accommodation.</li> <li>✓ Please refer to the cover letter by McCutcheon Halley Planning which lists the additional reports which accompany this pre-application submission all of which are aimed at demonstrating the quality of the buildings and residential environment being created.</li> </ul> |
| 5         | Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.  | <ul style="list-style-type: none"> <li>✓ The proposed development will add to the densification of Ennis. It will create a new residential area where currently there is under-utilised land.</li> </ul>  |
| 6         | Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in | <ul style="list-style-type: none"> <li>✓ The existing greenfield site is currently underutilised and used for agricultural use. The development of a high-density residential scheme will rejuvenate the area bringing a level of activity that is currently absent.</li> </ul>   |

| Reference | Relevant Policy / Principle / Guideline   | Statement of Consistency   |
|-----------|---|--|
|           | order to sustainably influence and support their surrounding area.  |  |
| 7         | <p>Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on inter alia:</p> <ul style="list-style-type: none"> <li>- Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;</li> <li>- Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes;</li> <li>- In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth</li> </ul> | <ul style="list-style-type: none"> <li>✓ The proposed development is located on a greenfield site in close proximity to commercial and recreational employment hubs.</li> <li>✓ The site’s zoning facilitates and is appropriate for high density development</li> </ul> |
| 8         | To ensure that the targeted pattern of population growth of Ireland’s cities to 2040 is in accordance with the targets set out for  | <ul style="list-style-type: none"> <li>✓ The proposed development will provide high density residential development that will facilitate an increase in the population of Clare</li> </ul>   |

| Reference | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
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|           | Dublin of an increase in population of approximately 20-25% (or 235,000 - 293,000 people) by 2040  |  |
| 11        | In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.  | <ul style="list-style-type: none"> <li>✓ The proposed development seeks permission for a residential density of 32.5 units/ha on a greenfield site.</li> <li>✓ The additional population will lead to strengthening of jobs and activity within the area through the knock-on effect on services and facilities within the existing urban area and therefore satisfies objective 11</li> </ul>   |
| 13        | In urban areas, planning and related standards, including building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected. | <ul style="list-style-type: none"> <li>✓ The scale of the development is appropriate to the site and location. The open spaces and enhanced pedestrian and cycle links will create a sustainable and compact development that encourages movement of pedestrians and promotes greater use of alternative modes of travel.</li> <li>✓ The pre-application submission is supported by a comprehensive suite of assessments assessing the development against performance-based criteria. Please refer to the cover letter by McCutcheon Halley Planning which provides a list of the supporting assessments which accompany this application.</li> </ul> |
| 26        | Support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, though   | <ul style="list-style-type: none"> <li>✓ The site is located within the Ennis development boundary in close proximity to the local services.</li> </ul>  |

| Reference | Relevant Policy / Principle / Guideline   | Statement of Consistency   |
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|           | integrating such policies, where appropriate and at the applicable scale, with planning policy.   | <ul style="list-style-type: none"> <li>✓ The proposed development includes an amenity walkway, Open Spaces and Playground/play areas. The development also includes a number of informal grassed areas to encourage future occupants to live active lifestyles.</li> <li>✓ The site is also adjacent to Ennis Golf Club.</li> </ul>  |
| 27        | Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.                     | <ul style="list-style-type: none"> <li>✓ The proposed development is on a greenfield site fronting onto a main street- Circular Road and will generate increased pedestrian and cycling activity. The result will be safer streets and open areas with increased passive surveillance providing a deterrent to anti-social behaviour.</li> <li>✓ The site will be served by a single vehicle access point but also provides for 5 no. pedestrian/cycle connections surrounding the site, including Circular Road and the N85.</li> <li>✓ Permeability is central to the design and in this regard, it is proposed to create new pedestrian access points throughout the site which will connect to the existing pedestrian paths in the area.</li> <li>✓ Cycle parking spaces are proposed throughout the site for future occupants and visitors.</li> </ul> |
| 28        | Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services | <ul style="list-style-type: none"> <li>✓ The proposed development provides for a varied housing mix that will cater for a range of household sizes.</li> <li>✓ The Applicant will comply with their Part V obligations and deliver 57 no. social and affordable housing units.</li> <li>✓ Communal open space is located throughout the development and is arranged to offer full connectivity between all the neighbourhood areas.</li> <li>✓ The scheme incorporates a childcare facility to cater for the development.</li> <li>✓ The proposed development is Part M compliant and thus includes access for people with disabilities</li> </ul>   |

| Reference | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
|-----------|---|---|
| 31        | <p>Prioritise the alignment of targeted and planned population and employment growth with investment in:</p> <ul style="list-style-type: none"> <li>The provision of early childhood care and education (ECCE) facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations</li> </ul> | <p>✓ 1 no. 340.7sqm childcare facility is provided on site</p>  |
| 32        | <p>Target the delivery of 550,000 additional households up to 2040</p>  | <p>✓ The proposed development will contribute 289 no. new households to the target</p>  |
| 33        | <p>Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location</p>  | <p>✓ The proposed development provides 289 no. units on a greenfield site within close proximity to Ennis town Centre. The scale of the development would support proposed improvements to the public transport infrastructure.</p>   |
| 34        | <p>Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time</p>   | <p>✓ A mix of unit types and sizes have been provided to accommodate changes to household size.<br/>                     ✓ The proposed development is designed with a Universal Design Approach i.e., so that they can be readily accessed and used by everyone, regardless of age, size ability or disability<br/>                     ✓ The proposed development is Part M compliant</p> |
| 35        | <p>Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area</p>   | <p>✓ The proposed development is proposed on a vacant site and designed to maximise density and height, make the most efficient use of the land, public</p>   |

| Reference | Relevant Policy / Principle / Guideline   | Statement of Consistency   |
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|           | or site-based regeneration and increased building heights   | transport investment and utilisation, and increasing the proportion of people living in the area of Ennis.   |
| 52        | The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital | <ul style="list-style-type: none"> <li>✓ The proposed dwellings is designed to the nearly zero energy building (NZEB) standard at a high level of energy efficiency minimising the use of natural resources (energy and water). NZEB compliant buildings generally achieve a BER of A2-A3. Dwellings have been designed to ensure the wall thickness can accommodate the necessary insulation for NZEB buildings.</li> <li>✓ Irish Water has confirmed the feasibility of the scheme in terms of potable water supply and foul water discharge – please refer to Civil Engineering Report by Tobins Consulting Engineers.</li> </ul> |
| 54        | Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.  | <ul style="list-style-type: none"> <li>✓ The proposed development is designed to accommodate a nearly zero energy building (NZEB) meaning that the buildings have a very high energy performance.</li> </ul>   |
| 56        | Sustainably manage waste generation, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.   | <ul style="list-style-type: none"> <li>✓ The proposed development incorporates adequately sized waste management facilities that will promote source segregation of waste streams i.e. organics, recyclable and residual waste.</li> </ul>   |
| 60        | Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.  | <ul style="list-style-type: none"> <li>✓ The proposed development has integrated existing natural features, such as existing hedgerows, into the proposed design.</li> </ul>   |

| Reference | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
|-----------|--|---|
| 63        | Ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.  | <ul style="list-style-type: none"> <li>✓ Sustainable urban drainage system (SuDS) measures are incorporated as appropriate into the proposed design.</li> </ul>   |
| 64        | Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions. | <ul style="list-style-type: none"> <li>✓ The proposed development will support sustainable modes of transport, by encouraging the movement of pedestrians and cyclists in and enhancing connections to the town centre. This will serve to promote a modal shift in transport and a reduction in emissions.</li> <li>✓ Cycle parking spaces are provided within the scheme.</li> <li>✓ The proposed development is designed to NZEB and will achieve a high level of energy efficiency through minimising the use of fossil fuels and associated emissions to air.</li> </ul> |
| 75        | Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate   | <ul style="list-style-type: none"> <li>✓ An AA Screening, NIS Report and EIAR will be included with the application.</li> </ul>   |

## 2.2 Rebuilding Ireland: Action Plan for Housing and Homelessness, 2016

*Rebuilding Ireland, an Action Plan for Housing and Homelessness*, comprises five pillars of concerted actions right across Government – addressing homelessness, accelerating social housing, building more homes, improving the rental sector and utilising existing housing. A key priority is addressing the unacceptable level of homeless families and long-term homeless people in emergency accommodation, by providing rapid housing delivery, alongside measures to support those at risk of losing their homes.

A truly ambitious social housing programme of 47,000 units to 2021 was proposed delivered with funding of €5.35 billion. The overarching aim of the Action Plan is to ramp up delivery of housing from its current under-supply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation, especially those families in emergency accommodation

| Aspect   | Key Objective  | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
|--|--|--|--|
| <b>Pillar 2:<br/>Accelerate<br/>Social<br/>Housing</b> | Increase the level and speed of delivery of social housing and other State supported housing | Key actions:<br>47,000 social housing units delivered by 2021, supported by investment of €5.35 billion<br>Mixed-Tenure Development on State Lands and other lands | ✓ The proposed development will provide 20% social housing units in line with legislative requirements. The development will therefore contribute 57 no. units towards the delivery of social housing units as set within Pillar 2 of the Action Plan. |
| <b>Pillar 3:<br/>Build<br/>More<br/>Homes</b>          | Increase the output of private housing to meet demand at affordable prices                   | Key actions:<br>Doubling of output to deliver over 25,000 units per annum on average over the period of the Plan (2017-2021)                                       | ✓ The proposed development will provide 289 no. residential units and will therefore contribute towards the target.  |

### 2.3 Sustainable Residential Development in Urban Areas, 2009

These guidelines set out key planning principles for the local planning policy framework and for the assessment of residential development. The guidelines provide best practice criteria related to a number of criteria including layout, distinctiveness, public realm, connections and detailed design. These criteria are also considered under Section 2.4 *Urban Design Manual*.

The guidelines set out principles to ensure that developments are sustainable in terms of their density; capacity of available services; proximity to a range of community; support facilities and public transport; accessibility; use of energy and that they provide a safe and attractive environment. In terms of individual housing units, the guidelines provide principles to ensure a quality living environment, including consideration of levels of daylight and sunlight, privacy, and storage space.

| Reference        | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
|------------------|--|--|
| <b>Chapter 3</b> | Application of 12 Best-Practice Criteria   | ✓ Compliance with each of the criteria is addressed in Section 2.4.  |
|                  | Have designers carried out a site appraisal prior to preparing a layout.   | ✓ Yes – Detailed site investigation works, and a site appraisal have been carried out.   |
|                  | Is the standard of design of a sufficiently high standard?   | ✓ Yes – The design complies with design guidelines requirements.   |
|                  | Does the design of residential streets strike the right balance between the different functions of the street, including a sense of place? | ✓ Yes – The layout provides for a hierarchy of streets as well as various residential character areas with local level access roads and footpaths. Cycling is provided along the proposed western pedestrian/cycle path parallel to the N85 with connection points to the north west of the site to the N85 and adjoining residential development to the south west as well as through the shared surface areas within the road network. |

| Reference        | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
|------------------|---|---|
| <b>Chapter 4</b> | Are lands in accordance with sequencing priorities of development plan / LAP?   | ✓ Yes – The site is zoned for residential development in the Clare County Development Plan 2017.  |
|                  | Assessment of the capacity of existing schools.   | ✓ Yes – Existing primary and secondary schools within the area with the closest being in Ennis National School and St Flannan’s College. A school assessment has been carried out and has confirmed that there is capacity in the area.                           |
|                  | Input of other necessary agencies.  | ✓ Yes – Irish Water and Clare County Council were consulted in the development of the proposed layout.  |
|                  | Appropriate range of community & support facilities.  | ✓ Yes – A creche, amenity spaces, cycle/pedestrian trail and play areas are provided for on-site. The site is also directly adjacent to the Ennis Golf Course.  |
|                  | For higher density schemes, is there adequate existing public transport, or will it be provided in tandem with development. | ✓ Yes – The railway station and Ennis Bus Station is located 2.5km from the subject site.   |
|                  | Will the development:   |   |
|                  | <ul style="list-style-type: none"> <li>• Prioritise public transport, cycling and walking.</li> </ul>                       | ✓ Yes – The environs provide a good network of footpaths and cycleways and is in close proximity to Ennis Town Centre. The layout of the proposed development provides a good pedestrian and cycle environment and connection of footpaths in the wider environs. |
|                  | <ul style="list-style-type: none"> <li>• Ensure accessibility for everyone</li> </ul>                                       | ✓ Yes – The layout and unit design fully comply with the requirements of Part M of the Building Regulations and principles of Universal Design.   |

| Reference  | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
|--|--|---|
|  | <ul style="list-style-type: none"> <li>Encourage more efficient use of energy</li> </ul>   | <ul style="list-style-type: none"> <li>✓ Yes – The layout encourages walking and cycling.</li> <li>✓ Units are designed to achieve an NZEB target rating.</li> </ul>  |
|  | <ul style="list-style-type: none"> <li>Include right quality &amp; quantity of public open space.</li> </ul>   | <ul style="list-style-type: none"> <li>✓ Yes – There is a provision of 15% public open spaces, designed to create usable spaces of high-quality amenity &amp; aesthetic quality.</li> </ul>   |
|  | <ul style="list-style-type: none"> <li>Include measures for satisfactory standards of personal safety and traffic safety.</li> </ul>                         | <ul style="list-style-type: none"> <li>✓ Yes – The road layout is compliant with DMURS requirements.</li> </ul>   |
|  | <ul style="list-style-type: none"> <li>Present an attractive and well-maintained appearance.</li> </ul>  | <ul style="list-style-type: none"> <li>✓ Yes – The layout ensures an appropriate balance between private and public open space. Public open space will be easy to maintain and are well overlooked to ensure passive surveillance, avoiding anti-social behaviour, littering or vandalism.</li> </ul> |
|  | <ul style="list-style-type: none"> <li>Promote social integration, provide for diverse range of household types, age groups and housing tenures.</li> </ul>  | <ul style="list-style-type: none"> <li>✓ Yes – The layout provides for a wide mix of unit types and sizes, as detailed in the Design Statement by Deady Gahan Architects.</li> </ul>  |
|  | <ul style="list-style-type: none"> <li>Protect and where possible enhance the built and natural heritage.</li> </ul>   | <ul style="list-style-type: none"> <li>✓ Yes – New planting will increase the biodiversity of the site and reinforce the existing conditions.</li> </ul>  |
|  | <ul style="list-style-type: none"> <li>Provide for Sustainable Drainage Systems.</li> </ul>  | <ul style="list-style-type: none"> <li>✓ Yes – SuDs principles will be incorporated throughout the site.</li> </ul>   |
| <b>Chapter 5<br/>Cities and<br/>Larger Towns</b> | <ul style="list-style-type: none"> <li>Are residential densities sufficiently high in location which are, or will be, served by public transport.</li> </ul> | <ul style="list-style-type: none"> <li>✓ Yes – The density is 32.5 units per hectare. This is considered an appropriate density for the site.</li> </ul>  |

| Reference   | Relevant Policy / Principle / Guideline   | Statement of Consistency   |
|---|---|--|
|   | <ul style="list-style-type: none"> <li>Are higher densities accompanied by high qualitative standard of design and layout?</li> </ul>   | <ul style="list-style-type: none"> <li>✓ Yes – The design and layout provide for high qualitative standard of units and private and public open space.</li> </ul>  |
|   | <ul style="list-style-type: none"> <li>Does design and location of new apartment blocks respect the amenities of existing adjacent housing in terms of sunlight and overlooking?</li> </ul> | <ul style="list-style-type: none"> <li>✓ Yes – There sufficient separation distance between each residential block to ensure the development respects the amenities of exiting adjacent housing.</li> </ul>  |
| <p><b>Chapter 7</b><br/><b>The Home and Its Setting</b></p> | <ul style="list-style-type: none"> <li>In higher density developments, does quality of design and finish extend to individual dwellings and its immediate surroundings.</li> </ul>          | <ul style="list-style-type: none"> <li>✓ Yes – The external finishes and landscape design have been designed to provide a high-quality environment.</li> </ul>   |
|   | <ul style="list-style-type: none"> <li>Decent levels of amenity, privacy, security and energy efficiency.</li> </ul>  | <ul style="list-style-type: none"> <li>✓ Yes - all dwellings and apartments have access to private open space and public open space, are well overlooked and well above minimum standards detailed in Appendix 1 of the 2020 Apartment Guidelines . Units are designed to comply with the 2020 NZEB standard in terms of energy efficiency.</li> </ul> |
|   | <ul style="list-style-type: none"> <li>Will orientation of dwellings and internal layout maximise levels of daylight and sunlight?</li> </ul>   | <ul style="list-style-type: none"> <li>✓ Yes - all dwellings and apartments have been designed to maximise daylight and passive solar energy gains.</li> </ul>   |
|   | <ul style="list-style-type: none"> <li>Has privacy been considered in design of the home.</li> </ul>  | <ul style="list-style-type: none"> <li>✓ Yes – The layout has been designed to avoid overlooking and protect the privacy of adjoining properties. All dwellings/apartments are designed to prevent acoustic transfer.</li> </ul>   |

| Reference | Relevant Policy / Principle / Guideline   | Statement of Consistency   |
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|           | <ul style="list-style-type: none"> <li>▪ Do all houses have an area of private open space behind the building line?</li> </ul>        | <ul style="list-style-type: none"> <li>✓ Private open space is provided to all apartments. The communal residential amenities proposed are of a very high quality and well above minimum standards detailed in Appendix 1 of the 2020 Apartment Guidelines.</li> </ul> |
|           | <ul style="list-style-type: none"> <li>• Has the design been influenced by the principles of universal design?</li> </ul>             | <ul style="list-style-type: none"> <li>✓ Yes - The design complies with Part M of the Building Regulations and principles of Universal Design.</li> </ul>  |
|           | <ul style="list-style-type: none"> <li>Has adequate provision been made for the storage and collection of waste materials?</li> </ul> | <ul style="list-style-type: none"> <li>✓ Yes - All apartments have areas for the storage and sorting of recyclables and adequate bin storage to serve the development is located at ground floor level.</li> </ul>   |

## 2.4 Urban Design Manual – A Best Practice Guide 2009

The Urban Design Manual is a guide to best practice in urban design and illustrates how the planning guidelines can be implemented effectively and consistently across the different scales of urban development around the country. It should be read in conjunction with the Department’s guidelines ‘*Sustainable Residential Development in Urban Areas 2009*’. The Guide focuses on the issues presented in housing schemes in the 30-50 units per hectare density range and also addresses some of the specific issues generated by higher and lower density schemes in urban areas.

| Reference  | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
|--|--|---|
| <p><b>1. Context:</b><br/>How does the development</p> | <ul style="list-style-type: none"> <li>• The development seems to have evolved naturally as part of its surroundings.</li> </ul> | <ul style="list-style-type: none"> <li>✓ The proposed development is in the southwestern environs of Ennis town. The proposed layout responds to the need to integrate with its surroundings while also considering the sites constraints and topographical context.</li> </ul> |

| Reference                           | Relevant Policy / Principle / Guideline   | Statement of Consistency   |
|-------------------------------------|---|--|
| <p>respond to its surroundings?</p> | <ul style="list-style-type: none"> <li>• Appropriate increases in density respect the form of buildings and landscape around the site’s edges and the amenity enjoyed by neighbouring users.</li> <li>• Form, architecture, and landscaping have been informed by the development’s place and time.</li> <li>• The development positively contributes to the character and identity of the neighbourhood.</li> <li>• Appropriate responses are made to the nature of specific boundary conditions.</li> </ul> | <ul style="list-style-type: none"> <li>✓ The density of the proposed development is in accordance with the Guidelines on Sustainable Residential Developments</li> <li>✓ The form and design of the buildings have been developed to reflect market demand while also incorporating elements of contemporary detailing which signifies the specific time and place.</li> <li>✓ The Landscape Masterplan has been developed to provide a structure which strengthens and supports the overall design concept. This approach will ensure that the scheme will act as an attractive and sustainable residential expansion while also positively contributing to the character and identity of Ennis.</li> <li>✓ With regard to boundary conditions which include recreational and residential uses, considerable effort has been made to respond positively to this wherever possible.</li> </ul> |
| <p><b>2. Connections:</b></p>       | <ul style="list-style-type: none"> <li>• There are attractive routes in and out for pedestrians and cyclists.</li> </ul>  | <ul style="list-style-type: none"> <li>✓ The proposed development is set around a network of streets, interlinked pedestrian and cyclist pathways and open space which provide excellent connections to local services and employment areas within the town of Ennis. The site is shaped by the</li> </ul>   |

| Reference   | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
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| <p>How well connected is the new neighbourhood?</p>                                     | <ul style="list-style-type: none"> <li>• The development is located in or close to a mixed-use centre.</li> <li>• The development’s layout makes it easy for a bus to serve the scheme.</li> <li>• The layout links to existing movement routes and the places people will want to get to.</li> <li>• Appropriate density, dependent on location, helps support efficient public transport.</li> </ul>                                 | <p>arterial route located either side of the site with 1 no. vehicular access point onto the Circular Road which runs to the east of the site. This arterial route is in turn fed by a number of shared surface routes, which offer direct access to each home zone area. These routes are designed to favour pedestrians and cyclists, creating a safe and overlooked environment. The centres of activity provided within the site, including the creche are located in close proximity to the entrance to the development offering the community easy access to important local services.</p> <p>✓ The proposed layout has provided opportunities for pedestrian connections to adjacent lands and the wider area.</p>  |
| <p><b>3. Inclusivity:</b><br/>How easily can people use and access the development?</p> | <ul style="list-style-type: none"> <li>• New homes meet the aspirations of a range of people and households.</li> <li>• Design and layout enable easy access by all.</li> <li>• There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly.</li> <li>• Areas defined as public open space that have either been taken in charge or privately</li> </ul> | <p>✓ The proposed dwellings offer a broad range of accommodation choice, in terms of both unit size and configuration. This variety will be attractive to a range of people and household types. The design and layout of the proposed development will meet the requirements of all relevant documents, in particular Part M of the Technical Guidance Documents which deal with accessibility and inclusivity.</p> <p>✓ Public, private and communal amenity spaces have been developed to suit children of varying ages, teenagers, adults and seniors where relevant. These spaces are well defined and accessible to all. This will encourage the utilisation of the public realm by the community. All buildings are designed to provide passive surveillance of the public realm, including streets, paths and open spaces.</p> |

| Reference  | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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|  | <p>managed will be clearly defined, accessible and open to all.</p> <ul style="list-style-type: none"> <li>• New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers.</li> </ul>  |   |
| <p><b>4. Variety:</b><br/>How does the development promote a good mix of activities?</p> | <ul style="list-style-type: none"> <li>• Activities generated by the development contribute to the quality of life in its locality.</li> <li>• Uses that attract the most people are in the most accessible places.</li> <li>• Neighbouring uses and activities are compatible with each other.</li> <li>• Housing types and tenure add to the choice available in the area.</li> <li>• Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.</li> </ul> | <ul style="list-style-type: none"> <li>✓ The development is primarily residential, in accordance with the zoning objective of the site. However, a creche has been provided as part of the proposed development to cater for the childcare needs of the future residents. This facility is located in a convenient location and will be invaluable to future residents as well as existing residents in the area.</li> <li>✓ A wide variety of house types have also been provided with a choice of 1, 2, 3 and ¾ bedroom semi-detached houses, townhouses and apartment variations. This will add to the choice available in the area and directly address the current shortage and resultant demand for high quality, residential units in Ennis and throughout Clare.</li> </ul> |

| Reference  | Relevant Policy / Principle / Guideline   | Statement of Consistency   |
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| <p><b>5. Efficiency:</b><br/>How does the development make appropriate use of resources, including land?</p> | <ul style="list-style-type: none"> <li>The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design.</li> <li>Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems.</li> <li>Buildings, gardens and public spaces are laid out to exploit the best solar orientation.</li> <li>The scheme brings a redundant building or derelict site back into productive use.</li> <li>Appropriate recycling facilities are provided.</li> </ul> | <ul style="list-style-type: none"> <li>✓ An appropriate balance has been struck in terms of achieving required densities alongside open space requirements to ensure that the land is used efficiently, whilst quality of environment and place is retained.</li> <li>✓ Landscaped areas consist of amenity walk, play equipment, informal play areas, outdoor gym equipment, open spaces and retention of existing trees and hedgerows. These will provide both passive and active amenity opportunities for the residents of the proposed development while also enhancing the biodiversity of the site. SuDs principles will also be incorporated wherever possible.</li> </ul> |
| <p><b>6. Distinctiveness:</b></p>  | <ul style="list-style-type: none"> <li>The place has recognisable features so that people can describe where they live and form an emotional attachment to the place.</li> </ul>  | <ul style="list-style-type: none"> <li>✓ The development includes local materials e.g. natural stone wall as part of the landscape plan.</li> <li>✓ The proposed design and layout of the development will create home zones which will complement each other but be sufficiently individual to promote their own sense of place.</li> </ul>   |

| Reference   | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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| <p>How does the proposal create a sense of place?</p>   | <ul style="list-style-type: none"> <li>• The scheme is a positive addition to the identity of the locality.</li> <li>• The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout.</li> <li>• The proposal successfully exploits views into and out of the site.</li> <li>• There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre.</li> </ul> | <p>✓ The buildings will use materials, proportions and features that respect and enhance the existing local setting but express it in a more contemporary way. Careful consideration will be given to the individual zones, balancing a palette of materials that will offer a cohesive and mixed layout, whilst respecting the existing buildings within the locality.</p>   |
| <p><b>7. Layout:</b><br/>How does the proposal create people-friendly streets and spaces?</p> | <ul style="list-style-type: none"> <li>• Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.</li> <li>• The layout focuses activity on the streets by creating active frontages with front doors directly serving the street.</li> <li>• The streets are designed as places instead of roads for</li> </ul>   | <p>✓ The proposed layout responds to the site by exploiting existing features, orientation, views and topography where possible to maximise the potential of the site.</p> <p>✓ The proposed layout provides for and ensures connectivity. A connection is also facilitated to the existing footpath network along Circular Road, the development provides pedestrian connections to the N85 and the exiting residential development to the south west. All routes are scaled appropriately to enhance legibility. In general speed will be controlled on the vehicular routes through passive measures including landscaping, pedestrian priority zones and raised tables.</p> <p>✓ The streets and pathways benefit from passive surveillance from the units that front onto them. Pedestrians / cyclists are prioritised through the incorporation of a network of pathways as well as the use of shared surfaces.</p> |

| Reference   | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
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|   | <p>cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.</p> <ul style="list-style-type: none"> <li>• Traffic speeds are controlled by design and layout rather than by speed humps.</li> <li>• Block layout places some public spaces in front of building lines as squares or greens, and some semiprivate space to the back as communal courts.</li> </ul> |   |
| <p><b>8. Public Realm:</b><br/>How safe, secure and enjoyable are the public areas?</p> | <ul style="list-style-type: none"> <li>• All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.</li> <li>• The public realm is considered as a usable integrated element in the design of the development.</li> <li>• Children’s play areas are sited where they will be overlooked, safe and contribute to the</li> </ul>  | <ul style="list-style-type: none"> <li>✓ The scheme is designed to balance the private and public open amenity needs of the community.</li> <li>✓ The open spaces and play areas have been designed to be overlooked where possible. Specific house types have been developed for corners in order to provide passive surveillance of all areas. This will increase the perceived sense of safety of those using the amenity area as well as their usability.</li> <li>✓ A clear definition is provided between public and private areas. Changes in material and the use of landscaping within the street and private areas will mark the transition between the two zones.</li> </ul> |

| Reference   | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
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|   | <p>amenities of the neighbourhood.</p> <ul style="list-style-type: none"> <li>• There is a clear definition between public, semi private, and private space.</li> <li>• Roads and parking areas are considered as an integral landscaped element in the design of the public realm.</li> </ul>   |  |
| <p><b>9. Adaptability:</b><br/>How will the buildings cope with change?</p> | <ul style="list-style-type: none"> <li>• Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.</li> <li>• The homes are energy-efficient and equipped for challenges anticipated from a changing climate</li> <li>• Homes can be extended without ruining the character of the types, layout and outdoor space.</li> <li>• The structure of the home and its loose fit design allows for adaptation and subdivision,</li> </ul> | <ul style="list-style-type: none"> <li>✓ The varying house types will be designed to be adaptable should the future occupants of the dwellings require additional habitable space in the future.</li> <li>✓ The majority of dwellings will be designed to provide optional conversion of the attic space, which will increase the size of dwellings to provide flexibility for families change where necessary.</li> <li>✓ Homes on larger plots will also be designed to facilitate extension if required; as the provision of surplus rear garden space would also allow for same should the owner require this in the future.</li> <li>✓ The proposed development is designed to the nearly zero energy building (NZEB) standard at a high level of energy efficiency minimising the use of natural resources (energy and water). NZEB compliant buildings generally achieve a BER of A2-A3.</li> </ul> |

| Reference   | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
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|   | <p>such as the creation of an annexe or small office.</p> <ul style="list-style-type: none"> <li>Space in the roof or garage can be easily converted into living accommodation.</li> </ul>  |   |
| <p><b>10. Privacy and Amenity:</b></p> <p>How does the scheme provide a decent standard of amenity?</p> | <ul style="list-style-type: none"> <li>Each home has access to an area of useable private outdoor space.</li> <li>The design maximises the number of homes enjoying dual aspect.</li> <li>Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout.</li> <li>Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units.</li> <li>The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables.</li> </ul> | <ul style="list-style-type: none"> <li>✓ The proposed layout has been designed to ensure that each residential unit within the development will have a high standard of residential amenity and privacy. This has been achieved by carefully locating, orientating and positioning each dwelling and also by providing generous separation distances between residential units. Windows are sited to prevent overlooking into adjacent private gardens.</li> <li>✓ Generous rear gardens will also be provided throughout the development where possible, which meet the guidelines set out for minimum rear garden sizes and will be oriented to maximise solar exposure. Duplex and apartment units will benefit from access to their own balcony. All homes will have adequate storage areas and areas for sorting of recyclables.</li> <li>✓ Landscaping will also prevent direct views into the units from the street and public areas.</li> </ul> |

| Reference   | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
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| <p><b>11. Parking:</b><br/>How will parking be secure and attractive?</p>       | <ul style="list-style-type: none"> <li>• Appropriate car parking is on-street or within easy reach of the home's front door.</li> <li>• Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation.</li> <li>• Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.</li> <li>• Materials used for parking areas are of similar quality to the rest of the development.</li> <li>• Adequate secure facilities are provided for bicycle storage.</li> </ul> | <p>✓ Car parking is provided on site with 1 and 2 bed unit having access to 1 no. on curtilage space. All 3 bed units will have access to 2 no. car parking spaces either within the driveway of the dwellings or within close proximity to the front door, equating to 488 no. car parking spaces. A total of 90 no. car parking spaces are provided for the 1 bed apartments and 2 bed townhouses and this is compliant to the parking provisions of the CDP. Adequate vehicular and cycle parking will also be provided in the non-residential areas of the site, in line with the requirements of CDP.</p> |
| <p><b>12. Detailed Design:</b><br/>How well thought through is the building</p> | <ul style="list-style-type: none"> <li>• The materials and external design make a positive contribution to the locality.</li> <li>• The landscape design facilitates the use of the public spaces from the outset.</li> </ul>  | <p>✓ As noted above, Ennis has been subject to some residential development in previous years and development such as the subject scheme presents significant challenges to create a complimentary identity to that of existing development while relating to the immediate surroundings and promoting a high-quality design. The proposed design will do this by reflecting the form, detailing and material palette of existing buildings in a more contemporary manner, that will respect and enhance the local setting and the existing dwellings within the surrounding area.</p>                         |

| Reference             | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
|-----------------------|---|---|
| and landscape design? | <ul style="list-style-type: none"> <li>• Design of the buildings and public space will facilitate easy and regular maintenance.</li> <li>• Open car parking areas are considered as an integral element within the public realm design and are treated accordingly.</li> <li>• Care has been taken over the siting of flues, vents and bin stores.</li> </ul> | <p>✓ The proposed landscape design will frame the open spaces, creating a strong, attractive design. This is continued through to the hard landscaping, including pathways and parking areas, which are treated as an integral part of the public realm. The selection of materials and planting will be durable and facilitate easy maintenance.</p> |

**2.5 Design Manual for Urban Roads and Streets, 2019**

The Design Manual or Urban Roads and Streets (DMURS) was initially published by the Department of Transport, Tourism and Sport, together with the Department of the Environment, Community and Local Government in 2013, and updated in 2019. DMURS seeks to put well-designed streets at the heart of sustainable communities and supports boarder government policies on the environment, planning and transportation. DMURS provides the practical measures to achieve:

1. Highly connected street which allow people to walk and cycle to key destinations in a direct and easy-to find manner.
2. A safe and comfortable street environment for pedestrians and cyclists of all ages.
3. Streets that contribute to the creation of attractive and lively communities.
4. Streets that calm traffic via a range of design measures that make drivers more aware of their environment.

DMURS replaced previous national design standards for urban roads and streets, and the use of DMURS is mandatory for all road authorities.

| Reference                          | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
|------------------------------------|--|---|
| <b>Integrated Street Networks</b>  | <ul style="list-style-type: none"> <li>Does the development create connected centres that prioritise pedestrian movement and access to public transport?</li> </ul>  | <ul style="list-style-type: none"> <li>✓ The proposed development includes very good pedestrian/cyclist accessibility throughout the site. All pathways/walkways are also linked to the comprehensive network of footpaths in order to prioritise pedestrian movement.</li> </ul>   |
| <b>Movement and Place</b>          | <ul style="list-style-type: none"> <li>Does the development create a legible street hierarchy that is appropriate to its context?</li> <li>Are the proposed streets connected, maximising the number of walkable / cyclable routes between streets as well as specific destinations (i.e. community centre, shops, creche, schools etc.)?</li> </ul> | <ul style="list-style-type: none"> <li>✓ The layout creates a scheme that is easy to navigate for both drivers and pedestrians, as well as providing connectivity for pedestrians and cyclists. The major destinations within the site are located close to the main entrance. To highlight the hierarchy, the scale of the routes varies, as well as their material finishes in order to clearly define the transition between areas.</li> </ul>   |
| <b>Permeability and Legibility</b> | <ul style="list-style-type: none"> <li>Has the street layout been well considered to maximise permeability for pedestrians and cyclists?</li> <li>Are the streets legible with maximum connection opportunities?</li> <li>Are blocks of a reasonable size and permeability, with consideration to the site constraints?</li> </ul>                   | <ul style="list-style-type: none"> <li>✓ The design and layout have been developed to maximise permeability for pedestrians and cyclists. independent paths have been provided away from the vehicular routes to follow desire lines between destinations in order to improve circulation through the site.</li> <li>✓ Neighbourhood areas have been sized so as to allow permeability and maximise comfortable walking / cycling distances between destinations.</li> <li>✓ Careful consideration has been given to allowing the free flow of movement and not creating unnecessary blockages / delays.</li> </ul> |

| Reference                        | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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| <b>Management</b>                | <ul style="list-style-type: none"> <li>Is the layout designed to self-regulate vehicle speeds and traffic congestion?</li> <li>Does the proposed layout minimise noise / air pollution wherever possible?</li> </ul>   | <ul style="list-style-type: none"> <li>✓ A careful balance has been sought between the topography of the site and optimising the usability of the roadways. Where possible, passive methods will be incorporated to regulate traffic and speed including landscaping, pedestrian priority zones and shorter street lengths. Design details will also be utilised to reduce driver’s perception of acceptable speeds.</li> <li>✓ In terms of minimising noise and air pollution, the design of the scheme has incorporated landscaping throughout the site to help reduce such pollution within the home zones.</li> </ul> |
| <b>Movement, Place and Speed</b> | <ul style="list-style-type: none"> <li>Does the proposed development balance speed management with the values of place and reasonable expectations of appropriate speed?</li> <li>Does the design promote a reasonable balance of both physical and psychological measures to regulate speed?</li> </ul> | <ul style="list-style-type: none"> <li>✓ Passive measures have been used to create a balanced management of speed on site. More active measures including shared surfaces are used in areas to prioritise pedestrian movements and regulate vehicular speed.</li> <li>✓ A wide network of footpaths and cycle routes are also provided to prioritise sustainable methods of transport within the site.</li> </ul>   |
| <b>Streetscape</b>               | <ul style="list-style-type: none"> <li>Does the scheme create an appropriate sense of enclosure in addition to a strong urban / suburban structure?</li> <li>Have street trees and areas of planting been provided where appropriate?</li> </ul>   | <ul style="list-style-type: none"> <li>✓ The residential areas are arranged in a manner which creates a defined structure and is easily legible. Street widths, planting and design details are used to create an appropriate sense of enclosure within each area. A Landscape Masterplan by Doyle O’ Troithigh Landscape Architect has been prepared and submitted as part of this SHD application which creates a strong landscape structure within the future streets.</li> </ul>  |

| Reference                                 | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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|   | <ul style="list-style-type: none"> <li>• Have active street edges been provided where appropriate?</li> <li>• Is a palette of high-quality surface materials and finishes provided?</li> </ul>   | <ul style="list-style-type: none"> <li>✓ Material finishes include a palette of high quality, easily maintainable and durable materials.</li> </ul>   |
| <b>Pedestrian and Cyclist Environment</b> | <ul style="list-style-type: none"> <li>• Are footways of appropriate width provided so as to ensure pedestrian safety?</li> <li>• Are verges provided adjacent to larger roadways so as to provide a buffer between vehicular routes and pedestrian paths?</li> <li>• Have pedestrian crossings, whether controlled or uncontrolled, been provided at appropriate locations?</li> <li>• Are shared surfaces located appropriately in areas where an extension of the pedestrian domain is required?</li> <li>• Have cycle facilities been factored into the design?</li> </ul> | <ul style="list-style-type: none"> <li>✓ The design prioritises the provision of footpaths of appropriate widths to ensure pedestrian safety.</li> <li>✓ Uncontrolled pedestrian crossings are provided in the form of shared surface areas / raised crossing and are located along the vehicular streets along the open space areas to increase pedestrian safety.</li> <li>✓ Cycling facilities, including parking, have been factored into the design where possible and provides the inclusion of bike stores, bike stores have also been provided for the mid-townhouse units which do not have direct garden access. Bike stores have also been provided for the proposed creche facility.</li> </ul> |
| <b>Carriageway Conditions</b>             | <ul style="list-style-type: none"> <li>• Are vehicular carriageways sized appropriately for their function / location?</li> <li>• Are surface materials appropriate to their application in order to</li> </ul>  | <ul style="list-style-type: none"> <li>✓ Vehicular carriageways have been sized appropriately commensurate with their function / location and in accordance with DMURS principles. Surface materials are appropriate to their application in order to inform drivers of the expected driving conditions and junctions have been designed to balance traffic concerns with the needs of pedestrians / cyclists.</li> </ul>   |

| Reference | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
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|           | <p>inform drivers of the expected driving conditions?</p> <ul style="list-style-type: none"> <li>• Are junctions designed to balance traffic concerns with the needs of pedestrians / cyclists?</li> <li>• Have adequate parking / loading areas been provided?</li> </ul> | <ul style="list-style-type: none"> <li>✓ Raised speed tables have been provided to reduce speeds and address the needs of pedestrians and cyclists crossing the junctions.</li> <li>✓ Adequate levels of parking will be provided in appropriate areas to serve the respective dwelling units and creche.</li> </ul> |

## 2.6 Sustainable Urban Housing: Design Standards for New Apartments 2020

The Sustainable Urban Housing: Design Standards for New Apartments 2020 (2020 Apartment Guidelines) updates previous guidelines issued by the Government in 2015, 2018 and 2020. The 2020 Apartment Guidelines are centred on the NPF's focus for compact growth and the recognition that to sustainably meet the number of new homes required in Ireland up to 2040 will necessitate a significant and sustained increase in housing output and apartment type development in particular.

| Reference                             | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
|---------------------------------------|--|---|
| <b>Apartment Floor Area &amp; Mix</b> | <p>Section 3.4 states that the following minimum floor areas for apartments:</p> <ul style="list-style-type: none"> <li>• 1-bed studio apartment = 37 sqm <ul style="list-style-type: none"> <li>• 1-bed = 45 sqm</li> <li>• 2-bed = 73 sqm</li> <li>• 3-bed = 90 sqm</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>✓ The layout provides for 12 no. 1 bed apartment and 12 no. 2 bed duplex apartments</li> <li>✓ All unit types exceed the minimum floor areas as detailed in the Apartment Guidelines, minimum proposed 54m<sup>2</sup> for 1 bed and 65.9m<sup>2</sup> for 2 bed;</li> <li>✓ Please refer to the HQA by Deady Gahan Architects.</li> </ul> |

| Reference                             | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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|                                       | <p>Section 3.6 outlines a two bedroom apartment to accommodate 3 persons with a minimum floor area of 63m<sup>2</sup></p> <p>Section 3.12 also requires that in a scheme of 10 or more apartments, the majority of all apartments must exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3-bedroom unit types by a minimum of 10%.</p>                                |   |
| <p><b>Dual Aspect Ratio</b></p>       | <p>Section 3.17 requires:</p> <ul style="list-style-type: none"> <li>• Minimum 50% dual aspect apartments in urban locations.</li> <li>• This may be reduced to a minimum 33% in certain circumstances where it is necessary to ensure good street frontage and subject to high quality design, usually on inner urban sites, near to city or town centres, including SDZ areas.</li> <li>•</li> </ul> | <p>✓ All apartments within the scheme will be designed to be dual aspect at a minimum, minimum size is 54m<sup>2</sup>.</p>   |
| <p><b>Floor to Ceiling Height</b></p> | <p>Section 3.14 requires that minimum ceiling heights accord with the Building Regulations (i.e. 2.4m). Ceiling heights at ground floor level should be greater, a minimum 2.7m.</p> <p>Section 3.25 allows for the relaxation in ceiling heights for building refurbishment schemes.</p>  | <p>✓ The ceiling height of all new build apartments will be consistent with what is required in the guidelines with ground floor ceiling height of all apartments at 2.77m.</p> |

| Reference                      | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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| <b>Lift / Stair Cores</b>      | Section 3.21 requires that, subject to compliance with dual aspect ratios and the building regulations, up to 12 apartments per floor per individual stair/lift core may be provided in apartment schemes.   | ✓ All stair cores provided within the scheme will serve a maximum of 2 no. units.   |
| <b>Internal Storage</b>        | <p>Section 3.30 states that provision should be made for storage and utility (additional to kitchen/bedroom furniture), specifically for household utility functions such as clothes washing and the storage of bulky personal or household items.</p> <p>Section 3.33 states that secure storage can be provided at ground or basement level, and this may be used to satisfy up to half of the minimum storage requirement for individual apartment units.</p> | <p>✓ Each apartment unit will be provided with adequate levels of storage internally and the exceedance of minimum floor levels will allow for the provision of additional storage should this be required by the occupant.</p> <p>✓ Storage proposed is 3.4m<sup>2</sup> for P1 units and 3.2m<sup>2</sup> for P2 units.</p>               |
| <b>Private Amenity Space</b>   | <p>Section 3.35 requires that private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels.</p> <p>A minimum depth of 1.5m is required for balconies.</p>   | ✓ All apartments are provided with a generous private open space area.  |
| <b>Security Considerations</b> | Section 3.28 states that apartment developments should provide residents and visitors with a sense of safety, by maximising natural surveillance of streets, open spaces, play areas and any surface bicycle or car parking. Accordingly, blocks and buildings   | ✓ All apartments front onto the surrounding public realm, affording the space with passive surveillance and increasing the sense of safety in the area. The apartments overlook the adjacent open spaces. All entrance points are safe and secure. They are located at levels to ensure that pedestrian activity is maximised. The entrance |

| Reference                  | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
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|                            | should overlook the public realm. Entrance points should be clearly indicated, well lit, and overlooked by adjoining dwellings. Particular attention should be given to the security of ground floor apartments and access to internal and external communal areas. | points are clearly identifiable through careful detailing and material usage.   |
| <b>Access and Services</b> | Section 4.1 requires apartment schemes to be capable of meeting the changing needs of occupants through compliance with Part M of the building regulations  | <ul style="list-style-type: none"> <li>✓ As stated previously, pedestrian and cyclist accessibility is a primary consideration of the proposed development. The development has been designed to be universally accessible. All access points, whether directly from street level or with the inclusion of ramps, will all be Part M compliant. The public open spaces and pedestrian walkways are also accessible to ensure that all members of the public regardless of age or ability can access the spaces.</li> <li>✓ All internal spaces are designed to be Part M compliant and will be subject to the completion of a Disability Access Certificate (where relevant) following the grant of planning permission.</li> </ul> |
| <b>Communal Rooms</b>      | Section 4.5 states that communal rooms may be provided in apartment schemes, including meeting rooms or management/maintenance offices, as well as childcare and gym uses that may be open to non-residents.  | <ul style="list-style-type: none"> <li>✓ No communal space has been provided for the apartments. This is considered appropriate given the ample level of space provided within each apartment as well as the level of facilities/amenities that have been provided on site including a creche. The site is also well located to other facilities and services in the area.</li> </ul>   |
| <b>Refuse Storage</b>      | Section 4.8 requires that provision shall be made for the appropriate storage and collection of waste   | <ul style="list-style-type: none"> <li>✓ Appropriate facilities have been provided within each apartment block to facilitate the storage and collection of waste materials within</li> </ul>  |

| Reference | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
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|           | <p>materials in apartment schemes. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage.</p> <p>Section 4.9 outlines the following general design considerations:</p> <ul style="list-style-type: none"> <li>• Sufficient communal storage area to satisfy the three-bin system for the collection of mixed dry recyclables, organic waste and residual waste;</li> <li>• In larger apartment schemes, consideration should also be given to the provision of separate collection facilities for other recyclables such as glass and plastics;</li> <li>• Waste storage areas must be adequately ventilated so as to minimise odours and potential nuisance from vermin/flies;</li> <li>• Provision in the layout for sufficient access for waste collectors, proximity of, or ease of access to, waste storage areas from individual apartments, including access by disabled people;</li> <li>• Waste storage areas should not present any safety risks to users and should be well-lit;</li> </ul> | <p>the apartment block. These areas are sufficiently sized to allow for the provision of appropriate recycling and sorting facilities, will be adequately ventilated and secure so as to minimise the risk of potential nuisance from vermin/flies. All areas are easily accessible both by occupants and bin collection vehicles.</p> |

| Reference                          | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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|                                    | <ul style="list-style-type: none"> <li>• Waste storage areas should not be on the public street, and should not be visible to or accessible by the general public.</li> <li>• Waste storage areas in basement car parks should be avoided where possible, but where provided, must ensure adequate manoeuvring space for collection vehicles;</li> <li>• The capacity for washing down waste storage areas, with wastewater discharging to the sewer.</li> </ul> |   |
| <b>Communal Amenity Facilities</b> | Section 4.10 requires the provision and proper future maintenance of well-designed communal amenity space is critical in meeting the amenity needs of residents. The design must ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight.   | ✓ The proposed scheme is adequately served by open space areas and amenity facilities. This will ensure that the needs of future residents are met. The design, orientation and location of these facilities will also ensure that the spaces benefit from adequate levels of sunlight. |
| <b>Children's Play</b>             | Section 4.13 requires that the recreational needs of children must be considered as part of communal amenity space within apartment schemes.   | ✓ Play areas have been provided throughout the scheme and incorporated into the open space areas with many located within close proximity to the proposed apartment units. These play areas benefit from the passive surveillance from surrounding residential areas.                   |
| <b>Car Parking</b>                 | Section 4.18 states that the quantum of car parking provision for residential developments generally is a matter for individual planning authorities having  | ✓ 1 no. car spaces will be provided per unit for the apartment units which is compliance with the parking requirements of the CDP.  |

| Reference              | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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|                        | <p>regard to local circumstances (notably location and access to public transport).</p> <p>The Guidelines state that planning authorities may consider reduced parking in suburban / urban locations well served by public transport and must apply a maximum car parking standard.</p> <p>Where reduced parking is provided, a limited number of drop-off, service and visitor parking spaces should be provided, as well as alternatives, such as car sharing, cycle parking and secure storage.</p> |   |
| <b>Bicycle Parking</b> | <p>Section 4.15 states that bicycle parking provision for residential developments generally is a matter for individual planning authorities.</p> <p>Where provided, bicycle parking spaces should be conveniently accessible to residents, both in terms of proximity to access points i.e. stair/lift cores to apartments and routes to the external road/ street network.</p>   | <p>✓ Adequate level of cycle spaces will be provided per unit for the apartment units within the curtilage of the property, as per the requirements of Appendix 1 of the CDP.</p> |
| <b>Childcare</b>       | <p>The guidelines state that one-bedroom and studio apartments should not generally be considered for calculating childcare provision requirements.</p>  | <p>✓ 1 no. childcare facility is provided on site.</p>  |

### 2.7 Childcare Facilities Guidelines

| Reference  | Relevant Policy / Principle / Guideline   | Statement of Consistency                                  |
|--|---|---|
| <b>Chapter 3</b><br><b>Development</b><br><b>Control &amp;</b><br><b>Related</b><br><b>Standards</b> | In new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate. This is a guideline standard and will depend on the particular circumstances of each individual site. | ✓ 1 no. 340.7 sqm childcare facility is provided on site. |
| <b>Appendix 1</b><br><b>General</b><br><b>Standards</b>  | Standards related to minimum floor space, facilities and design of childcare facilities should follow the guidelines set out in appendix 1 of the Childcare Facilities Guidelines.  | ✓ 1 no. 340.7 sqm childcare facility is provided on site. |

### 2.8 The Planning System and Flood Risk Management, 2009

| Reference  | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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| <b>Chapter 5</b><br><b>Flooding &amp;</b><br><b>Development</b><br><b>Management</b> | Sequential approach should be applied to avoid development in areas at risk of flooding. | ✓ A flood risk assessment will be provided to ensure floor levels are set to an appropriate height to accommodate 1 in 100 year flood event. A Flood Risk Assessment has been undertaken by Tobin Consulting Engineers. The site is outside the 1 in 1000-year flood plain according to the CFRAMs maps. As such the development is in Flood Zone C. Therefore, the development is appropriate. |

| Reference | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
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|           | Where appropriate a detailed flood risk assessment is to accompany planning applications. | ✓ Yes – a flood risk assessment accompanies the proposal.   |
|           | Development in flood risk areas should be subject to the Justification test.              | ✓ Noted – flood risk assessment concludes that the development is not at risk of flooding. Therefore, a Justification Test is not required. |

## 2.9 Urban Development and Building Heights, 2018

The Urban Development and Building Height Guidelines 2018 (UDBHG) reflect the NPF’s focus on compact growth and the significant scope to accommodate anticipated population growth by building up and consolidating the development of our existing urban areas.

The UDBHG set out 4 Specific Planning Policy Requirements (SPPR) that planning authorities must consider when assessing development proposals.

| Reference     | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
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| <b>SPPR 1</b> | In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly in town / city cores, planning authorities shall explicitly identify through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Frameworks and Regional Spatial and Economic Strategies and shall | ✓ A net density of 32.5 no. units per hectare is achieved on site. The proposed development site is considered suitable for increased density/scale given its strong connectivity and accessible location to Ennis town centre. The identification of suitable areas for increased height will likely form part of the next County Development Plan. In the absence of this guidance the current proposal will be accompanied by extensive supporting material including a Landscape and Visual Impact Assessment. The proposed heights have been carefully located so as not to have an adverse impact on adjoining properties. |

| Reference                                     | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
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|   | not provide for blanket numerical limitation on building height.  |   |
| <b>SPPR 2</b>                                 | In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities. | ✓ The proposed development is primarily a residential development and incorporates a creche and residential amenity uses. |
| <b>At the scale of the relevant city/town</b> | <ul style="list-style-type: none"> <li>• The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</li> <li>• Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into</li> </ul>  | ✓ The railway station and Ennis Bus Station is located 2.5km from the subject site.                                       |

| Reference   | Relevant Policy / Principle / Guideline   | Statement of Consistency   |
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|   | <p>/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.</p> <ul style="list-style-type: none"> <li>On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</li> </ul> | <ul style="list-style-type: none"> <li>✓ The proposed development includes heights which are consistent with the prevailing single/two storey heights in this part of the town.</li> <li>✓ The development will make a positive contribution to the area with sufficient variety in form to respond to the modest scale of adjoining developments and will create visual interest in the streetscapes running through the scheme.</li> </ul> |
| <p><b>At the scale of district / neighbourhood / street</b></p> | <ul style="list-style-type: none"> <li>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</li> <li>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with</li> </ul>   | <ul style="list-style-type: none"> <li>✓ The proposed development responds to the need to integrate with its surroundings while also considering the sites constraints, potentials and topographical context.</li> <li>✓ The proposed development is not monolithic and includes a variety of house typologies and materials.</li> </ul>   |

| Reference                                  | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
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|  | <p>materials / building fabric well considered.</p> <ul style="list-style-type: none"> <li>• The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway / marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of <i>“the Planning System and Flood Risk Management – Guidelines for Planning Authorities”</i> (2009).</li> <li>• The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</li> <li>• The proposal positively contributes to the mix of uses and / or / building / dwelling typologies available in the neighbourhood.</li> </ul> | <ul style="list-style-type: none"> <li>✓ A range of uses, public open spaces, increased connectivity have been provided to support the future residential community and the existing community within the area.</li> <li>✓ The proposed development will make a positive contribution to the area and will provides residential units that will make a positive contribution to the area and improvements/upgrades to the pedestrian footpaths along Circular Road including an uncontrolled pedestrian crossing and pedestrian footpath provision along part of the Drumbiggle and Cahercalla Roads.</li> <li>✓ The proposed development provides a mix of 1, 2, 3 and 3/4 bed residential units within close proximity to Ennis town centre.</li> </ul> |
| <b>At the scale of the site / building</b> | <ul style="list-style-type: none"> <li>• The form, massing and height of proposed developments should be carefully modulated so as to maximise</li> </ul>   | <ul style="list-style-type: none"> <li>✓ The scale, massing and urban grain have been developed to reflect the prevailing context of the surrounding area and to maximise the natural daylight ventilation and views. Care has been taken to avoid overshadowing and loss of light to neighbouring properties. A</li> </ul>   |

| Reference | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
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|           | <p>access to natural daylight ventilation and views and minimise overshadowing and loss of light.</p> <ul style="list-style-type: none"> <li>• Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2<sup>nd</sup> edition) or BS 8206-2:2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’.</li> <li>• Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to the local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban</li> </ul> | <p>sunlight/daylight/overshadowing analysis has been prepared by BPC Engineers and forms part of this SHD application.</p> <p>✓ The proposed development is full compliance and achieves all the relevant standards.</p> |

| Reference                   | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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|                             | regeneration and or an effective urban design and streetscape solution.  |   |
| <b>Specific Assessments</b> | <p>To support the proposals at some or all of these scales, specific assessments may be required, and these may include:</p> <ul style="list-style-type: none"> <li>• Specific impact assessment of the micro-climate effects such as down draft. Such assessments shall include measures to avoid / mitigate such micro-climate effects and, where appropriate, shall include an assessment of the cumulative micro-climate effects wherever taller buildings are clustered.</li> <li>• In development locations in proximity to sensitive bird and / or bat areas, proposed development needs to consider the potential interaction of the building location, building materials and artificial lighting it impact flight lines and / or collision.</li> <li>• An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</li> <li>• As assessment that the proposal maintains safe air navigation.</li> </ul> | <p>✓ A number of assessments relevant to the subject proposal are submitted with this application. Please refer to the cover letter by McCutcheon Halley Planning Consultants for a full list of supporting documentations relevant to the subject proposal which are submitted with this SHD application and include an AA Screening Report, NIS and EIAR.</p> |

| Reference            | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
|----------------------|---|---|
|                      | <ul style="list-style-type: none"> <li>An urban design statement including, as appropriate, impact on the historic built environments.</li> <li>Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.</li> </ul>   |   |
| <p><b>SPPR 3</b></p> | <p>It is a specific planning policy requirement that where:</p> <p>(A)1. An applicant for planning permission sets out how a development proposal complies with the criteria above:</p> <p>2. the assessment of the planning authority concurs taking account of the wider strategic and national policy parameters set out in the National planning Framework and these guidelines;</p> <p>Then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.</p> <p>In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where</p> | <p>✓ Compliance with the Urban Development and Building Heights, 2018 Guidelines, including SPPR 1 and 2 criteria is set out above.</p> |

| Reference            | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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|                      | <p>different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights, be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme.</p> <p>In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.</p> |   |
| <p><b>SPPR 4</b></p> | <p>It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:</p> <ol style="list-style-type: none"> <li>1. The minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential</li> </ol>  | <p>✓ The proposed density is 32.5 units per hectare. It is considered that the density is appropriate in this location, and for this type of scheme having regard to the Sustainable Residential Development in Urban Areas (2009) and is consistent with national planning guidelines.</p> |

| Reference | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
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|           | <p>Development in Urban Areas (2007)" or any amending or replacement guidelines.</p> <p>2. A greater mix of building heights and typologies in planning for the future development of suburban locations; and</p> <p>Avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.</p> | <p>✓ The mix of building heights and typologies proposed comprising a mixture of 165 no. 3 bed dwelling houses/townhouses, 78 no. 2 bed townhouses and apartments and 12 no. 1 bed apartments ensures the avoidance of mono-type building typologies.</p> |

### 3. Local Planning Policy

This section looks at consistency with the following Local Policy Document:

- Clare County Development Plan 2017.

#### 3.1 Clare County Development Plan 2017

| Reference                                | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
|--|---|---|
| <b>Chapter 2</b><br><b>Core Strategy</b> | Section 2.4.3 – Settlement Hierarchy and Strategy<br>The Settlement Hierarchy and Strategy for County Clare have been devised according to the following key aspects of the NSS: <ul style="list-style-type: none"><li>• The spatial structure set out in the strategy in relation to the Mid-West region including the designation of the Limerick/Shannon Gateway and Ennis Hub Town.</li></ul> | ✓ Lands are located in Ennis identified as a Hub Town in Clare. |

| Reference   | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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|   | <p>Table 2.4 of the Core Strategy Population Targets allocates a dwelling growth target for Ennis of 8,137 from 2011-2023.</p>   | <p>✓ The density level of 32.5 units per hectare provides an appropriate unit yield from the zoned lands in terms of achieving the total target growth.</p> |
| <p><b>Chapter 3<br/>Settlement<br/>Strategy</b></p> | <p>Ennis is Identified as a hub Town. It is an objective of Ennis to:</p> <p>a) To ensure that Ennis, as the County Town and as a designated Hub Town in the NSS, is a driver of County and regional prosperity by harnessing its strategic location and access on the Atlantic Corridor; its strong urban structure, existing retail, service and accommodation base and other competitive advantages</p> <p>b) To achieve a vibrant and culturally-rich Ennis area with a revitalised town centre and strong economic growth balanced with enhanced social inclusion, sustainable neighbourhoods and a high level of environmental quality to ensure an excellent quality of life for all;</p> | <p>✓ Development of the site is consistent with strategic objective for Ennis as a hub town.</p>  |

| Reference   | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
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|   | c) To prepare a local area plan for the Ennis Town and Environs area during the lifetime of this Development Plan.  |   |
| <b>Chapter 4<br/>Housing</b>  | <p>It is an objective of Clare County Council:</p> <ul style="list-style-type: none"> <li>a) In accordance with the requirements of Section 94(4)(c) of the Planning and Development Act, 2000 (as amended), to reserve 10% of land zoned for residential use, or for a mixture of residential and other uses, including 'low density residential' for the purpose of meeting social and affordable housing need arising within the County;</li> <li>b) To acquire land/ properties for social and affordable housing provision in advance of immediate requirements in order to be in a position to respond to housing supply and demand opportunities.</li> </ul> | <ul style="list-style-type: none"> <li>✓ It is proposed to transfer 57 units to meet the Part V requirement.</li> </ul>                                     |
| <b>Chapter 5<br/>Community Development &amp; Social Development</b> | <p>CDP5.16 – It is an objective of the DP to:</p> <ul style="list-style-type: none"> <li>a) To encourage the provision of affordable and accessible childcare and preschool facilities throughout County Clare;</li> <li>b) To facilitate the development of additional childcare services for vulnerable or disadvantaged groups in the community;</li> </ul>  | <ul style="list-style-type: none"> <li>✓ The proposed development provides a 340.7m<sup>2</sup> creche with capacity for c. 60 childcare spaces.</li> </ul> |

| Reference   | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
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|   | <p>c) To have regard to 'Childcare Facilities – Guidelines for Planning Authorities (2001)', or any updated version, in the assessment of applications for childcare facilities.</p>   |  |
| <p><b>Chapter 14</b><br/><b>Biodiversity, Natural Heritage and Green Infrastructure</b></p> | <p>Objective CDP14.1 requires Clare County Council to ensure that features of importance to local biodiversity are retained as part of developments and projects being undertaken in the County and to identify ecological buffer spaces/zones, where appropriate, in the Plan area</p>  | <ul style="list-style-type: none"> <li>✓ The proposed development provides for a buffer space along the western boundary and an area zoned as open space will be retained along the northern boundary of the site;</li> <li>✓ Native plant material will be considered for this scheme to improve the overall biodiversity of the site and soft work plant materials will enhance biodiversity and habitat creation.</li> <li>✓ The development will retain and infill boundary vegetation which will increase the sites biodiversity locally and improve linkages of green infrastructure and wildlife corridors to connect habitats with the surrounding environment.</li> </ul> |
|   | <p>CDP14.3<br/>Implement Article 6(3) and where necessary Article 6(4) of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011;</p> | <ul style="list-style-type: none"> <li>✓ The proposed development has prepared an Appropriate Assessment Screening Report and a Natura Impact Statement (NIS) which is submitted as part of this SHD application.</li> </ul>   |

| Reference   | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
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| <p><b>Chapter 15</b><br/><b>Architectural, Archaeological and Cultural Heritage</b></p> | <p>CDP 15.10<br/>To protect the Zones of Archaeological Potential located within both urban and rural areas as identified in the Record of Monuments and Places.</p>  | <ul style="list-style-type: none"> <li>✓ A desktop survey was carried out as part of the EIAR and did not identify any archaeological sites within the red line boundary of the site.</li> <li>✓ As a result of the presence of cultural heritage receptors within the environs of the proposed development site, it has been determined that there is a need to scope in Cultural Heritage as an environmental consideration in the EIA reporting pertaining to the proposed development.</li> </ul> |
| <p><b>Chapter 16</b><br/><b>Towns and Villages</b></p>                                  | <p>CDP 16.1<br/>To support local communities across the County in their work to enhance their towns and villages</p>  | <ul style="list-style-type: none"> <li>✓ The proposed development provides a 340.7sqm creche which will support the future residential community as well as the existing residents in the surrounding area.</li> </ul>  |
| <p><b>Chapter 17</b><br/><b>Design and Built Environment</b></p>                        | <p>CDP 17.1<br/>To ensure that structures or groups of structures in urban areas are designed to create spaces between buildings which are attractive places for people to occupy.</p>  | <ul style="list-style-type: none"> <li>✓ Large open spaces have been established along the boundary of the Golf Course in order to create attractive relationship between the Golf Course and the scheme.</li> <li>✓ Interspersed open spaces are provided throughout the scheme which consist of communal areas and encourage a sense of community and safe environments to play and interact.</li> </ul>  |
|   | <p>CDP 17.1<br/>To require all proposals for developments in excess of 3 residential units or 300m<sup>2</sup> to be accompanied by a design statement demonstrating how the 12 urban design principles set out in the Urban Design Manual (2009) have been addressed. A design statement may be required for smaller</p> | <ul style="list-style-type: none"> <li>✓ A design statement has been prepared by Deady Gahan Architects illustrating compliance with the 12 Urban Design Principals.</li> </ul>   |

| Reference  | Relevant Policy / Principle / Guideline   | Statement of Consistency   |
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|  | developments in instances where the proposed development is situated in a key location in the town or village.  |  |
|  | To require all new buildings, facilities and works to the public realm to meaningfully engage with the principles of universal design so that all environments and buildings can be accessed, understood and used by all persons to the greatest extent possible, having regard to all existing relevant legislation, publications and guidelines in their design.                                    | <ul style="list-style-type: none"> <li>✓ The design has had regard to all relevant legislation and guidelines and the development has ensured that accessible footpaths (part M Compliance) connect all the buildings and the open spaces on the site from the entrance.</li> <li>✓ A Universal Design Statement has been prepared by Deady Gahan Architects which has been submitted as part of the application.</li> </ul> |
|  | <p>CDP17.3</p> <p>To require all new developments to maximise energy efficiency and conservation and to ensure that they embrace the concept of sustainable design, achieve excellence in siting and design and promote the use of low carbon materials.</p>  | <ul style="list-style-type: none"> <li>✓ The development provides the provision of bicycle parking facilities for the residential units and creche facility.</li> <li>✓ The proposed layout has been designed to function as a sustainable and successful residential neighbourhood</li> </ul>   |
| <p><b>Chapter 18</b></p> <p><b>Climate Change Adaption, Flood Risk and Low Carbon Strategy</b></p> | <p>CDP18.6</p> <p>To ensure that proposals for development in areas where there is a risk of flooding, (based on the Flood Risk Maps contained in Volume 2 of the Clare County Development Plan 2017-2023, or any updated version), shall have regard to 'The Planning System and Flood Risk Management (and Technical Appendices) – Guidelines for Planning Authorities 2009' and any future OPW</p> | <ul style="list-style-type: none"> <li>✓ A Flood Risk Assessment has been undertaken by Tobin Consulting Engineers which has regard to The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and OPW flood assessment information.</li> </ul>   |

| Reference | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
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|           | <p>flood assessment information. Such proposals must also demonstrate that appropriate mitigation measures can be put in place.</p>  |  |
|           | <p>CDP18.7</p> <p>To have regard to the requirements and outcomes of the Catchment Flood Risk Assessment and Management Studies (CFRAMS) prepared for the Areas for Further Assessment in County Clare (once finalised) in the assessment of development proposals.</p>  | <p>✓ The Flood Risk Assessment report illustrates the development has regard to CFRAM.</p>   |
|           | <p>CDP18.8</p> <ul style="list-style-type: none"> <li>a) To ensure that adequate storm water infrastructure is in place to accommodate the planned level of growth in the Plan area;</li> <li>b) To require all new developments to provide a separate foul and surface water drainage system;</li> <li>c) To ensure the implementation of Sustainable Urban Drainage Systems (SuDS) and in particular, to ensure that all storm water generated in a new development is disposed of on-site or is attenuated and treated prior to discharge to an approved storm water system;</li> </ul> | <ul style="list-style-type: none"> <li>✓ The stormwater drainage strategy proposes to provide an infiltration basin located towards the northern most area of the development.</li> <li>✓ The design of the infiltration basin was calculated from the Sustainable Urban Drainage System (SuDS) manual to accommodate the 100 year return period and an additional 20" to account for the effects of climate change.</li> <li>✓ Surface water from the infiltration basin shall discharge via a hydrobrake manhole to a bio-swale which will limit the amount of water discharging to the Claureen river.</li> </ul> |

| Reference  | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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|  | <p>d) To request the submission of details regarding Surface Water Attenuation Systems for multiunit development applications in the Plan area. Development will only be permitted in areas where sufficient surface water capacity exists.</p>  |   |
| <p><b>Chapter 19</b><br/><b>Land Use and Zoning</b></p>    | <p>CDP 19.0<br/>To require development proposals to comply with the zoning of the subject site in the settlement plans and local area plans.</p>   | <p>✓ The development proposed residential units in line with the proposed zoning.</p>                                     |
| <p><b>Appendix 1</b><br/><b>Development Management</b></p> | <p>A1.1 -Pre Planning Consultations<br/>Applicants are encouraged to avail of this service</p>   | <p>✓ A Section 247 meeting was undertaken with Clare County Council.</p>  |
|  | <p>A1.2 – Design Statement<br/>For larger developments (in excess of 3 dwelling houses or &gt;300m<sup>2</sup>) and for sites in key locations applicants will be required to submit a design statement with their planning application referencing the main design considerations</p> | <p>✓ A design statement has been prepared by Deady Gahan Architects and is submitted as part of this SHD application.</p> |
|  | <p>A1.3.2 – Urban Residential Development<br/><b>Apartments:</b> The Planning Authority, in assessing proposals for apartment developments, will have regard to the <i>Sustainable Urban Housing: Design</i></p>   | <p>✓ A housing quality Assessment has been prepared by Deady Gahan architects and illustrates compliance.</p>             |

| Reference | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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|           | <p><i>Standards for New Apartments: Guidelines for Planning Authorities 2015 and Sustainable Residential Development in Urban Areas 2009.</i></p> <p><b>Part V:</b> Part V as set out in Section 96 of the Planning and Development Act 2000 (as amended) applies to lands zoned for residential use or a mixture of residential and other uses. The Planning Authority, in implementing Part V, will have regard to the Housing Strategy in place for the county at the time of implementation, the zoning objectives for the sites concerned and will ensure compliance with relevant legislation, including the Urban Regeneration and Housing Act 2015 and the Planning and Development Regulations 2001 (as amended).</p> <p><b>Street Lighting:</b> Lighting shall be provided in accordance with guidelines contained in <i>Recommendations for Site Development Works in Housing Areas</i> published by DoEHLG.</p> <p><b>Rear Garden Length:</b> Normally, a rear garden depth of 11m will be required. This is a minimum depth and larger distances may be required dependent on the nature and scale of the subject</p> | <ul style="list-style-type: none"> <li>✓ Please refer to the Part V drawing prepared by Deady Gahan Architects. 20% of units will be provided as part of the Part V requirement.</li> <li>✓ Public lighting has been provided as part of this development</li> <li>✓ All dwelling units will provide 11m rear gardens.</li> </ul> |

| Reference | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
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|           | <p>development. In the case of high density, infill developments or for housing for the older people, shorter garden lengths may be permitted if there are no overlooking issues.</p> <p><b>Plot Size:</b> A variety of plot sizes and shapes must be incorporated into the design and layout of residential developments to allow for the different needs of potential future residents.</p> <p><b>Boundary Treatment:</b> Generally boundary walls shall be 2m high and shall be provided along the rear garden boundary of each dwelling and along both side boundaries extending from the rear boundary to the front building line. The finish of the walls shall be consistent with the external finishes of the dwelling house or of a sympathetic material. Proposals for alternative boundary treatment such as planting combined with appropriate fencing will also be considered favourably if it can be demonstrated that it will enhance the development.</p> <p><b>Open Space in Residential Areas:</b> Each green space in residential developments shall have at least one native oak tree, or other naturalised tree species of similar stature and lifespan, integrated into the agreed planting/landscaping scheme.</p> | <ul style="list-style-type: none"> <li>✓ A variety of units and different unit sizes have been incorporated in the proposed design.</li> <li>✓ Boundary treatments will be provided as part of the application</li> <li>✓ Public open space has been provided throughout the site. Further information is provided in the Landscape Report and Landscaping Plan accompanying the planning application.</li> </ul> |

| Reference | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
|-----------|---|---|
|           | <p>A 1.3.3 – Childcare Facilities</p> <p>In new housing areas developers will be expected to plan for and include provision for childcare facilities.</p>   | <p>✓ The application provides a 340.7sqm crèche which will accommodate 60 child places. Refer to the creche drawing prepared by Deady Gahan Architects.</p> |
|           | <p>A1.6 Environmental Impact Assessment (EIA)</p> <p>An Environment Impact Statement is required with a planning application where the defined thresholds outlined in Schedule 5 of the Planning and Development Regulations 2001</p>   | <p>✓ An EIAR has been prepared as part of the submission of the planning application.</p>   |
|           | <p>A1.7 – Habitat Directive Assessment</p> <p>In accordance with the EU Habitats Directive any plan or project with the potential to impact on the integrity of a European site must be screened for appropriate assessment to determine if an appropriate assessment of the site is required.</p>      | <p>✓ An AA Screening and Natura Impact Statement have been prepared and submitted as part of this application.</p>  |
|           | <p>A1.8 – Archaeological Potential</p> <p>In considering proposals for development, applicants are advised to consult the archaeological maps (available for viewing in the Planning Department) in order to ascertain whether their development is located in an area of archaeological potential.</p> | <p>✓ Please refer to Cultural Heritage chapter of the EIAR</p>  |

| Reference | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
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|           | <p>A1.9 – Transportation –</p> <p>A1.9.1 – Roads, cycle routes and Footpaths</p> <p>Road categories, speed management and traffic calming will generally be required to comply with the current edition of Traffic Management Guidelines.</p>   | <p>✓ A Traffic and Transportation Assessment which includes a section of a mobility management plan has been prepared by Tobin Consulting Engineers, A Stage 1/2 Road Safety Audit and quality audit is submitted with the application.</p> |
|           | <p>A1.9.3 - Car Parking</p> <p>Section A1.9.3 refers to the provision of car parking spaces within the curtilage of the site or convenient to the development and notes that the provision should be based on the extent to which the development is likely to generate demand for additional parking spaces.</p> | <p>✓ Refer to proposed parking layout which accompanies the planning application.</p>   |
|           | <p>Cycle Parking</p> <p>Section of A1.9.3 relates to the provision of secure cycle parking facilities in new developments.</p>  | <p>✓ Provision for bicycle parking has been made within the curtilage of each unit</p>  |
|           | <p>A 1.9.4 – TIA, Road Safety Audit and Road Safety Impact Assessment</p>   | <p>✓ A Traffic and Transportation Assessment has been prepared by Tobin Consulting Engineers and A Stage 1/2 Road Safety Audit and quality audit have been prepared and submitted with the application.</p>                                 |

### 3.2 Ennis Municipal District (Volume 3a)

| Reference  | Relevant Policy / Principle / Guideline   | Statement of Consistency   |
|--|---|--|
| <p><b>Chapter 2.5</b><br/><b>Cahircalla More Neighbourhood</b></p> | <p>Site LDR66 Circular Road</p> <p>Residential development on this site will be required to incorporate a buffer of sufficient width between the proposed development and the N85 to protect residential amenity. Development proposals on the site shall be accompanied by a flood risk assessment to ensure that floor levels are set to an appropriate height (1-in-100-year flood event plus climate change allowance and freeboard). A drainage impact assessment will also be required.</p> | <p>✓ Development is designed to incorporate a buffer between the development and N85 and the proposed development will accompany a flood risk assessment and drainage impact assessment.</p> |

### 3.3 Draft Clare Development Plan 2022-2028

The Draft Clare County Development Plan 2022-2028 does not come into effect until the 29<sup>th</sup> of April 2023 and the main objective have been included in this assessment for the Boards consideration. The new County Development Plan will contain all relevant planning policies and objectives for the county. The Core Strategy of the draft Clare County Development Plan provides a settlement hierarchy in whereby Ennis is identified as a ‘Key Town’ and the largest settlement by far within the County. (As per the table below). The Core Strategy for the County identifies housing allocation and population for Ennis of 1,550 and 2,705.

| Reference                                   | Policy Objective | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
|---|------------------|--|--|
| <p><b>Chapter 2:<br/>Climate Action</b></p> |                  | <p>CDP 2.1 Climate Action</p> <p>To adopt sustainable planning strategies through integrating land use and transportation and by facilitating mixed use development as a means of supporting national targets of climate policy mitigation and adaptation objectives and reducing our carbon footprint and greenhouse gas emissions</p>      | <p>✓ The proposed development is designed to the nearly zero energy building (NZEB) requirements meaning that the buildings have a very high energy performance and minimising the use of natural resources (energy and water)</p> |
|   |                  | <p>CDP 2.6: Flood Risk Assessment and Management</p> <p>It is an objective of Clare County Council:</p> <p>To ensure development proposals have regard to the requirements of the SFRA and Flood Risk Management Guidelines; and where required are supported by an appropriately detailed hydrological assessment/flood risk assessment</p> | <p>✓ A Flood Risk Assessment is submitted for the proposed development by Tobin Consulting Engineers.</p>  |

| Reference                               | Policy Objective | Relevant Policy / Principle / Guideline   | Statement of Consistency   |
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|   |                  | <p>CDP 2.11 Storm Water Management</p> <p>It is an objective of Clare County Council to ensure that adequate storm water infrastructure is in place to accommodate the planned level of growth in the Plan Area and all new developments to provide a separate foul and surface water drainage system and implementation of Sustainable Drainage Systems (SuDS)</p> | <ul style="list-style-type: none"> <li>✓ SuDS are incorporated into the proposed design</li> <li>✓ Irish Water have confirmed the feasibility of the scheme subject to minor upgrades works o the wastewater treatment plant- please refer to Tobin’s Consulting Engineers Civils Design Report</li> </ul> |
| <p><b>Chapter 3 – Core Strategy</b></p> |                  | <p>Ennis is a ‘Key Town’ and the distribution of population an household growth is based on the NPF and RSES. The core strategy 2023-2029 outlines a population allocation of 2,705</p>   | <ul style="list-style-type: none"> <li>✓ The density level of 32.5 units per hectare provides an appropriate unit yield from the zoned land in terms of achieving the target growth in Ennis.</li> </ul>   |

| Reference  | Policy Objective | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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| <p><b>Chapter 4:<br/>Urban and<br/>Rural<br/>Settlement<br/>Strategy</b></p> |                  | <p>CDP 4.1 Ennis: Settlement and Hierarchy</p> <p>It is an objective of Clare County Council to support Ennis as a self-sustaining, regional economic driver and as a key location for investment choice in the County and the Southern Region</p>   | <ul style="list-style-type: none"> <li>✓ The proposed development supports the strategic aim of Ennis as a self-sustaining town within the Southern Regions, with the contribution to the growth of the population.</li> <li>✓ The proposed development will complement and consolidate the development of Ennis as Key Town within the Southern Region.</li> <li>✓ The proposed development prioritises and facilitates walking and cycling use by providing a high-quality link to the N85 Bypass and creating new pedestrian connections to the wider area of the subject site.</li> </ul> |
| <p><b>Chapter 4<br/>Urban and<br/>Rural<br/>Settlement<br/>Strategy</b></p>  |                  | <p>CDP 4.12 Monitoring and Implementation of Settlement Strategy</p> <p>It is an objective of Clare County Council to achieve the delivery of strategic, plan-led, co-ordinated, and balanced development of the settlements throughout the County and to monitor carefully the scale, rate and location of newly permitted developments and apply appropriate development management measures to ensure</p> | <ul style="list-style-type: none"> <li>✓ The proposed development has regard to the development of Ennis Town and incorporates services, social infrastructure and recreation facilities to meet the needs of existing and future populations.</li> </ul>   |

| Reference                            | Policy Objective                                      | Relevant Policy / Principle / Guideline   | Statement of Consistency  |
|--------------------------------------|---|---|---|
|                                      |   | <p>compliance with the Settlement Hierarchy and Strategy, including the population and housing targets for the County</p>   |   |
| <p><b>Chapter 5<br/>Housing</b></p>  | <p>CDP 5.1 Implementation of the Housing Strategy</p> | <p>CDP 5.1 Implementation of the Housing Strategy</p> <p>It is an objective of Clare County Council to secure the implementation and delivery of the Clare County Housing Strategy 2023-2029</p>  | <ul style="list-style-type: none"> <li>✓ The proposed density of the site is in accordance with the projected housing demands targets of 30-40% within Clare County Housing Strategy 2023-2029.</li> <li>✓ A Housing Quality Assessment is provided as part of the planning application documents.</li> </ul> |
| <p><b>Chapter 5:<br/>Housing</b></p> |   | <p>CDP 5.3 Living in our Towns and Villages</p> <p>Encourage the development of new residential accommodation in or adjoining town centres and to ensure that such development provide a range of accommodation types and tenures and a high level of residential amenity</p> | <ul style="list-style-type: none"> <li>✓ The proposed development incorporates services, social infrastructure and recreational facilities to the meet the needs of current and future populations</li> </ul>   |

| Reference                     | Policy Objective | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
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| <b>Chapter 5:<br/>Housing</b> |                  | <p>CDP 5.5 Social and Affordable Housing</p> <p>Require lands in respect of which permission for the development of houses is granted to comply with the Affordable Housing Act 2021 and Part V of the Planning and Development Act 2000. The Council reserves the right to determine the appropriateness of 'Part V' Cost Rental and/or affordable purchase delivery on individual sites on a case-by case basis.</p> | <p>✓ 57 no. Part V unit have been provided within the proposed development. This has been discussed and agreed in principle with Clare County Council.</p> |
| <b>Chapter 5:<br/>Housing</b> |                  | <p>CDP 5.7 Taking in Charge and Unfinished Developments</p> <p>It is an objective of Clare County Council to work with all relevant stakeholders to ensure that residential developments are taken in charge in accordance with the requirements of the Planning and Development Act, 2000 (as amended) and the Council's Taking in Charge Policy for Private Housing Developments 2009 and any subsequent policy</p>  | <p>✓ Deady Gahan Architects have provided a site layout plan to clearly indicate the areas to be Taken in Charge by the Local Authority.</p>               |

| Reference                            | Policy Objective | Relevant Policy / Principle / Guideline  | Statement of Consistency   |
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| <p><b>Chapter 5:<br/>Housing</b></p> |                  | <p>CDP 5.8 Housing Mix</p> <p>It is an objective of the Development Plan to secure the development of a mix of house types and sizes throughout the County to meet the needs of the likely future population in accordance with the guidance set out in the Housing Strategy, Housing Need Demand Assessment and the Guidelines on Sustainable Residential Development in Urban Areas and any subsequent guidelines</p> <p>To require the submission of a Statement of Housing Mix with all applications for multi-unit residential developments in order to facilitate the proper evaluation of the proposal relative to this objective</p> | <p>✓ A mix of unit types and sizes have been provided within the proposed development. This mix has been discussed and agreed in principle with Clare County Council.</p> <p>✓ A Statement of Housing Mix is submitted as part of the design statement as part of the application.</p> |

| Reference  | Policy Objective | Relevant Policy / Principle / Guideline  | Statement of Consistency  |
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| <p><b>Chapter 5:<br/>Housing</b></p>                 |                  | <p>CDP 5.16 Green Infrastructure in Residential Developments</p> <p>Ensure that green areas associated with new residential development enrich the quality of life of local residents and provide ecologically rich areas that enhance biodiversity and contribute to green infrastructure network in the County</p> | <ul style="list-style-type: none"> <li>✓ A Tree Survey and AIA report has been submitted as part of this application.</li> <li>✓ A Landscape Design Statement/Strategy has been submitted as part of the proposed development by Doyle O'Troithigh.</li> <li>✓ The proposed development will provide appropriate landscape screening at all site boundaries in order to protect and enhance the character and setting of the area.</li> </ul> |
| <p><b>Chapter 10<br/>Sustainable Communities</b></p> |                  | <p>CDP 10.2 – Sustainable and Inclusive Communities</p> <p>Provision of local play and community facilities to ensure that facilities are accessible to all local residents</p>  | <ul style="list-style-type: none"> <li>✓ This development provides active open spaces within the development, a creche, an amenity walkway and pedestrian connections to the wider area and these facilities will be available to the entire community, both existing and future.</li> </ul>  |

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| <p><b>Chapter 10</b><br/><b>Sustainable Communities</b></p> |                  | <p>CDP 10.5 Universal Accessibility</p> <p>Support the upgrade and extension of existing pedestrian provision and public lighting facilities in existing urban area to further promote walking, cycling and active travel.</p>   | <p>✓ The proposed development supports the upgrade and extension of pedestrian connectivity to wider area</p>  |
| <p><b>Chapter 10</b><br/><b>Sustainable Communities</b></p> |                  | <p>CDP 10.15 Childcare Facilities</p> <p>Encourage the provision of affordable and accessible childcare and pre-school facilities on well-located sites that are close to the populations they intend to serve throughout County Clare and in line with population and employment growth</p> <p>To facilitate the development of additional childcare services for vulnerable or disadvantaged groups in the community</p> <p>To have regard to Childcare Facilities – Guidelines for Planning Authorities (2001) or any updated version in the assessment of applications for Childcare Facilities.</p> | <p>✓ A Creche Demand Report has been submitted as part of this application to outline the demand of childcare facilities in the area.</p> <p>✓ A 60 place creche facility is proposed as part of this proposed development. A layout plan is provided by Deady Gahan Architects.</p> <p>✓ The proposal has had regard to the Childcare Facilities – Guidelines for Planning Authorities (2001)</p> |

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| <p><b>Chapter 10:<br/>Sustainable<br/>Communities</b></p>                                 |                  | <p>CDP 10.16 Primary and Secondary Education</p> <p>It is an objective of Clare County Council to assess and ensure the adequacy of school capacity when dealing with planning applications for large residential developments</p> <p>To require the provision of cycle lanes, footpaths and crossing and to promote the idea of a 'walking school bus serving primary and secondary school facilities to support safe and convenient active travel modes.</p> | <ul style="list-style-type: none"> <li>✓ The site is located within close proximity to Ennis town where there is adequate access to numerous schools within the vicinity of the site.</li> <li>✓ A School Demand Report has been prepared and submitted with this application.</li> <li>✓ The proposed development supports the sustainable methods of walking/cycling in facilitating pedestrian connections as part of this development.</li> </ul> |
| <p><b>Chapter 11:<br/>Physical<br/>Infrastructure,<br/>Environment<br/>and Energy</b></p> |                  | <p>CDP 11.5 Walking and Cycling</p> <p>It is an objective of Clare County Council to require walkability and accessibility to be a central consideration in the planning and design of all new development, transport infrastructure and public transport services</p>   | <ul style="list-style-type: none"> <li>✓ The proposed development promotes sustainable methods of transport including walking and cycling, with permeability facilitated within the development itself as well as connectivity to existing built up area.</li> <li>✓ The proposed development provides access to the N85 Bypass which hosts a cycle lane network path to Ennis Town.</li> </ul>   |

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| <p><b>Chapter 11:</b><br/><b>Physical Infrastructure, Environment and Energy</b></p> |                  | <p>CDP 11.18 Design Manual for Urban Roads and Streets (DMURS)</p> <p>It is an objective of Clare County Council to implement the requirements and recommendations contained in the DMURS in the assessment of development proposals, the preparation of design schemes and their implementation in the development of streets, roads and public realm improvements schemes in the County</p>   | <p>✓ The guidance contained in DMURS has been considered and incorporated into the proposed development by Tobin Consulting Engineers as part of this proposed development.</p> |
| <p><b>Chapter 11:</b><br/><b>Physical Infrastructure, Environment and Energy</b></p> |                  | <p>CDP 11.29 Water Services</p> <p>It is an objective of Clare County Council to work with Irish Water to identify and facilitate the timely delivery of the water services required to realise the development objectives to the Draft Plan</p> <p>To ensure that adequate water services will be available to service development prior to the granting of planning permission and to require developers to consult with Irish Water regarding available capacity prior to applying for planning permission</p> <p>To ensure the development proposal complies with Irish Water's standards and requirements in relation to water and</p> | <p>✓ Irish Water has confirmed the feasibility of the scheme in terms of water supply and foul water discharge</p>  |

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|  |                  | wastewater infrastructure to facilitate the proposed development  |   |
| <p><b>Chapter 11:</b><br/><b>Physical Infrastructure, Environment and Energy</b></p> |                  | <p>CDP 11.33 Strategic Wastewater Treatment Projects</p> <p>It is an objective of Clare County Council to liaise with Irish Water to ensure adequate wastewater treatment facilities are available to accommodate population growth in the County</p>   | <p>✓ Irish Water has confirmed there is capacity in the wastewater treatment facility to accept the proposed development</p>  |
| <p><b>Chapter 11:</b><br/><b>Physical Infrastructure, Environment and Energy</b></p> |                  | <p>CDP 11.38 Construction and Demolition Waste</p> <p>To require that a C&amp;D Waste Management Plan is prepared by the developer having regard to the Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects (July 2006) for new construction or demolition projects and to require that where appropriate the maximum amount of waste material generated on site is reused and recycled.To promote the production and reuse of aggregates from C&amp;D waste</p> | <p>✓ A Construction Waste Management Plan has been prepared and submitted as part of the proposed development and information also forms part of the EIAR</p> <p>✓ Any waste generated by the proposed development will be managed in accordance with best practise</p> |

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|   |                  | <p>and their use in construction projects in the Region and</p> <p>Encourage the development of C&amp;D waste recycling facilities at suitable sites including quarries, subject to normal planning and environmental consideration.</p>  |  |
| <p><b>Chapter 11</b><br/><b>Physical Infrastructure, Environment and Energy</b></p> |                  | <p>CDP 11.40 Noise Pollution</p> <p>It is an objective of Clare County Council</p> <p>To promote the pro-active management of noise where it is likely to have significant adverse impacts on health and the environment</p> <p>To ensure that all proposals for development with regard to transportation infrastructure shall comply with the provisions of the Clare Noise Action Plan (2018) and any subsequent plans</p> | <p>✓ A Construction and Environmental Management Plan has been prepared by Tobin Consulting Engineers which outlines all works will be carried out being mindful of potential noise impacts from construction.</p> <p>✓ In terms of minimising noise pollution, the design has incorporated design details and landscaping throughout the site to help reduce pollution.</p> |

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| <p><b>Chapter 15<br/>Biodiversity,<br/>Natural<br/>Heritage and<br/>Green<br/>Infrastructure</b></p> |                  | <p>CDP 15.4 Requirement for Appropriate Assessment</p> <p>It is an objective of Clare County Council to have regard to AA of Plans and Projects in Ireland – Guidelines for Planning Authorities and any updated versions</p>   | <p>✓ An AA Screening Report and Natura Impact Statement are submitted by Enviroguide as part of the proposed development.</p> |
| <p><b>Chapter 15<br/>Biodiversity,<br/>Natural<br/>Heritage and<br/>Green<br/>Infrastructure</b></p> |                  | <p>CDP 15.10 EIA</p> <p>Implement the EIA Directive, ensuring all elements/stages or components of the project are included in one overall assessment and all reasonable alternatives are taken into consideration in choosing the option with the least environmental impact</p> | <p>✓ An EIAR has been prepared by the Design Team which is submitted as part of this proposed development.</p>                |

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| <p><b>Chapter 15:<br/>Biodiversity,<br/>Natural<br/>Heritage and<br/>Green<br/>Infrastructure</b></p> |                  | <p>CDP 15.19 Woodlands, Trees and Hedgerows</p> <p>Preserve and conserve the individual or groups of trees identified in Volume 2 of this Plan as 'Trees for Preservation' which will enhance the character and appearance of an area</p> <p>To ensure, where required, applications for development include proposals for planting/leave a suitable ecological buffer zone between the development works and areas/features of ecological importance</p> <p>To require each green space in new residential developments to have at least one native oak tree, or naturalised tree species of a similar stature and lifespan, integrated into the agreed planting and landscaping scheme</p> | <ul style="list-style-type: none"> <li>✓ A tree survey was undertaken as part of the proposed development</li> <li>✓ The existing hedgerows and trees along the site boundary are to be retained and protected where possible. All trees to be maintained will be protected appropriately.</li> <li>✓ Existing trees and hedgerows are incorporated into the design of the proposal for the development. As part of the development, a large mature Oak tree will be retained beside the proposed creche facility</li> </ul> |
| <p><b>Chapter 16<br/>Architectural,<br/>Archaeological<br/>and Cultural<br/>Heritage</b></p>          |                  | <p>CDP 16.1 Architectural Heritage</p> <p>Ensure that the archaeological and architectural heritage of the County is not damaged either through direct destruction or by unsympathetic developments</p>  | <ul style="list-style-type: none"> <li>✓ A desktop survey carried out as part of the EIAR which did not identify any archaeological sites within the red line boundary of the site.</li> </ul>   |

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| <p><b>Chapter 18:</b><br/><b>Design and Placemaking</b></p> | <p>CDP 18.2 Achieving Quality in the Public Realm</p> | <p>CDP 18.2 Achieving Quality in the Public Realm</p> <p>It is an objective of Clare County Council to require both public and private developments to make a positive contribution to the public realm to ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being</p>                        | <ul style="list-style-type: none"> <li>✓ The proposed open spaces and amenities are dispersed throughout the site, making them accessible to the future population of the proposed development as well as the existing population of surrounding residential estates.</li> <li>✓ The proposed development provides multi-functional spaces for all age groups while open green spaces an amenity facility for younger generations.</li> </ul> |
| <p><b>Chapter 18:</b><br/><b>Design and Placemaking</b></p> |   | <p>CDP 18.3 Ten Minute Town</p> <p>It is an objective of Clare County Council to facilitate sustainable compact settlements with the “10-minute” town concept, whereby, a range of community facilities and services are accessible in short walking and cycle timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services</p> | <ul style="list-style-type: none"> <li>✓ A network of footpaths have been provided throughout the development which will improve connectivity and encourage walking and cycling.</li> <li>✓ The proposed development will be well connected to the surrounding area which will ensure permeability to the town centre of Ennis and ease of access to the area and town centres.</li> </ul>  |

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| <p><b>Chapter 18</b><br/><b>Design and Placemaking</b></p> |                  | <p>CDP 18.4 Universal Design</p> <p>All new buildings, facilities and works to the public realm to meaningfully engage with the principles of universal design so that all environments and buildings can be accessed, understood and used by all persons to the greatest extent possible and to have regard to all existing relevant legislation, publications and guidelines in their design</p> | <p>✓ The proposed development is designed with a Universal Design Approach so that it can be readily accessed and used by people regardless of age, ability, disability.</p> |
| <p><b>Chapter 18</b><br/><b>Design and Placemaking</b></p> |                  | <p>CDP 18.5 Sustainable Developments</p> <p>New developments to maximise energy efficiency and conservation and to ensure that they embrace the concept of sustainable design, achieve excellence in siting and design and promote the use of low carbon materials.</p>  | <p>✓ The proposed development is designed to a nearly zero energy building (NZEB), this means that the buildings have a very high energy performance.</p>                    |

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| <p><b>Chapter 18</b><br/><b>Design and Placemaking</b></p> | <p>CDP 18.6 Design and Built Environment</p> | <p>CDP 18.6 Design and Built Environment</p> <p>Encourage and facilitate excellence in the siting and design of new buildings in the county and particularly through contemporary and innovative architectural solutions, facilitate high standards of energy efficiency and promote the use of appropriate low carbon materials in all future development and embrace the principles of sustainable design;</p> <p>To ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages;</p> | <p>✓ The proposed development is designed to maximise density and make the most efficient use of land, while improvising sustainable modes of transport such as walking and cycling and enhance connections to the wider area of Ennis. This will serve to prompt a model shift in transport and a reduction in emissions.</p> |

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| <p><b>Chapter 19<br/>Land Use and<br/>Zonings</b></p> |                  | <p>CDP 19.2 Zoning of Lands</p> <p>Ensure that sufficient lands are zoned at appropriate locations in the settlement plans and local area plans of the County, in accordance with the Core Strategy population and housing targets, in order to meet the envisaged land use requirements of the area during the lifetime of this development plan</p> | <p>✓ The proposed development is in full accordance with the general land use objectives of the Clare County Development Plan and maximises the density to make the most efficient use of land.</p>   |
| <p><b>Chapter 19<br/>Land Use and<br/>Zonings</b></p> |                  | <p>CDP 19.3 Compliance with Zoning</p> <p>To require development proposals to comply with the zoning of the subject site in settlement plans and local area plans.</p>  | <p>✓ The development is primarily residential and a portion to the north is zoned open space. The proposed development complies with the open space zoning .</p> <p>✓ The development proposes a density level of 32.5 units per hectare which is in line with national guidance.</p> |

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| <p><b>Appendix 1</b><br/><b>Development Management</b></p> |                  | <p>A1.4.2 – Urban Residential Development</p> <p>Apartment Development to have regard to ‘Design Standards for New Apartments’ and ‘Urban Development and Building height guidelines (2018)</p> <p>Plot Sizes – A variety of plot sizes and shapes must be incorporated into the design and layout of residential development to allow for the different needs of potential future residents.</p> <p>All proposals shall provide acceptable separation distances and a minimum 1m separation distances for buildings over multiple floors and 11 rear garden depths</p> <p>Boundary Treatment – Walls between 1.8m and 2m high and consistent with finish of dwelling house or of a sympathetic material</p> <p>Open Space – Each green space in residential developments shall have at leave one native oak tree or other naturalised tree species of similar stature. Design should have regard to Section 5.2.14 – Green</p> | <ul style="list-style-type: none"> <li>✓ All apartments exceed the minimum floor areas outlined in the guidelines.</li> <li>✓ The development consists of 11 difference units types which range from 1 bed, 2 bed, 3 bed and 3/4 bed units.</li> <li>✓ Development consists of 11m setback to rear dwellings and appropriate separation distances have been provided between buildings.</li> <li>✓ Development consists of 1.8m high boundary walls, refer to Doyle&amp;O’Troithigh Landscape Architect drawings</li> <li>✓ Development provides 15% open space and retains a large ash tree within the entrance of the site and a large oak tree within the site is also</li> </ul> |

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|           |                  | <p>Infrastructure within Residential Development.</p> <p>Sustainable Mobility – Permeability and accessibility within the development is encouraged with the provision of pedestrian and cycle way. Developments comprising of 10 units or more shall be accompanied by a Transport and Mobility Statement outlining how pedestrian connectivity has been integrated into the design.</p> <p>Lifetime adaptability - All new residential buildings must provide a ground floor low level access shower and toilet to ensure adaptability to future needs. Both internal and 445 external layout and design must be adaptable to the varying and changing needs of occupiers during their lifetime</p> | <p>being retained as part of the proposed development.</p> <p>✓ A Transport and Traffic Assessment has been prepared as part of this development which includes a mobility management plan. This development provides for the provision of shared pedestrian and cycle paths within the development, connects to the adjoining lands and provides works connecting to the wider area.</p> <p>✓ The buildings have been designed to allow a great deal of flexibility and the proposed development is designed with a Universal Design Approach i.e. so that they can be readily accessed and used by everyone, regardless of age, size ability or disability</p> <p>✓ The proposed development is Part M compliant.</p> |

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|           |                  | <p>Childcare Facilities in Residential Areas - New housing schemes will be expected to plan for and include provision for childcare facilities. The level of provision will depend on the particular circumstances but as a guide one childcare facility for a minimum of 20 childcare places per approximately 75 dwellings may be appropriate.</p> <p>Design Statement - For larger developments (in excess of 3 dwelling houses or &gt;300m2) and for sites in key locations applicants will be required to submit a Design Statement with their planning application</p> <p>SuDS - The Planning Authority will require development proposals to minimise 'soil sealing' (the covering of ground by impermeable material) and all new developments (including amendments / extensions to existing developments) will be required to incorporate SUDS.</p> | <p>✓ This development provides for a 60 no. child place creche facility</p> <p>✓ A planning and design statement has been prepared by Deady Gahan Architects and forms part of this application.</p> <p>✓ SuDS measures are incorporated as appropriate into the proposed design.</p> |

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|           |                  | <p>Bicycle and Vehicle Parking for residential development -</p> <p>Bicycle - 1 space per unit</p> <p>Car Parking - 1 space for 1 &amp; 2 bed units and 2 spaces for 3 bed units.</p> <p>1 car parking space per 3 residential units</p> <p>Bicycle and Vehicle Parking for creche -</p> <p>Bicycle Parking - 1 space per 8 employees</p> <p>Car parking - 10 spaces per 100m<sup>2</sup> (net)</p><br><p>Traffic Impact Assessments (TIA), Road Safety Audit (RSA) - A road safety audit must be submitted as part of any planning application where the proposed development incorporates a new access to</p> | <ul style="list-style-type: none"> <li>✓ It is proposed to provide a total of 508 no. parking spaces within the development which will consist of 1 space for 1 and 2 bed units and 2 spaces for 3 bed and 16 visitor spaces, 4 disabled spaces and 11 no. spaces and 2 drop off spaces for the creche.</li> <li>✓ Semi-detached/End Townhouse/Maisonettes/GF Apartments have direct access to allocated private amenity space and can utility this are for bike storage. A total of 130 bicycle spaces have been provided for the Mid Townhouse Units and Duplex Units.</li> <li>✓ Creche provides 10 bicycles spaces for a 60 no. child place creche.</li> <li>✓ The crèche is 340.7m<sup>2</sup> and provides 11 car spaces and 2 set down bays</li> <br/> <li>✓ A TTA and RSA have been prepared by TOBIN consulting Engineers as part of this application.</li> </ul> |

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|  |                  | <p>a National Road or where it may give rise to an increase in traffic to a National Road and The TIA should be prepared in accordance with the Traffic Management Guidelines Manual 2003 issued by the Department of Transport and the Traffic and Transport Assessment Guidelines 2014 published by the NRA</p>          |  |
| <p><b>Volume 3a</b><br/><b>Ennis Municipal District Settlement Plan - LDR7 Objective - Low Density Residential Development</b></p> |                  | <p><b>Site LDR7 Circular Road</b> - Should future applications be made on site, development should incorporate a buffer of sufficient width between the proposed development and the N85 to protect residential amenity. Development shall be accompanied by a Flood Risk Assessment and a drainage impact assessment.</p> | <ul style="list-style-type: none"> <li>✓ Development has been designed to ensure the character of the area is maintained and further reinforced by a high standard design</li> <li>✓ Development is designed to incorporate a buffer between the development.</li> <li>✓ Development provides a Flood Risk Assessment and Drainage Impact Assessment as part of this application.</li> </ul> |

## 4. Conclusion

The Statement of Consistency provides an assessment of the proposed developments consistent with the relevant planning policy documents at national and local levels, including in particular *the Guidelines for Planning Authorities on Sustainable Development in Urban Areas (Cities, Towns and Villages)*, *the Urban Design Manual – A Best Practice Guide* and *for the Design Manual for Urban Roads and Streets* at a national level, and *the 2017 Clare County Development Plan* and *the Ennis Municipal District Settlement Plan*. It is submitted that the proposed SHD development is consistent with each of these documents and will provide a positive and significant contribution to the housing supply in Ennis.