

**STRATEGIC HOUSING DEVELOPMENT  
PLANNING APPLICATION  
STATEMENT OF CONSISTENCY  
FOR ALTERATIONS TO SHORELINE GA01  
LANDS AT BALDOYLE, DUBLIN 13**

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## 1 INTRODUCTION

On behalf of the Shoreline Partnership this Statement of Consistency with Planning Policy has been prepared to accompany a Strategic Housing Development Planning Application to An Bord Pleanála in relation to a proposed Strategic Housing Development at Baldoye, Dublin 13.

The proposed development which is the subject of this Planning Application to An Bord Pleanála is seeking to alter a permitted planning permission (FCC Reg. Ref. 16A/0412, ABP Reg. Ref. ABP-248970 (the parent permission), and as amended under F20A/0258 and F21A/0046).

The permitted development, as permitted under FCC Reg. Ref. 16A/0412, ABP Reg. Ref. ABP-248970 (and as subsequently amended under F20A/0258 and F21A/0046), permitted the development of 544 no. residential units (385 no. apartments and 159 no. houses) retail and a crèche. Of this permitted development 99 units, in Blocks C4, C5 and C6 (previously indicated as D1), are under construction. The planning history is set out in detail in Section 4.

This alteration application seeks to both alter and replace the remaining 445 residential units and associated development with the development of 882 no. residential dwellings (747 apartments, 135 houses), residential tenant amenity, retail, pharmacy, medical centre, restaurant, crèche within an extended site boundary. The proposed development relates to the alteration and replacement of development previously permitted at Blocks A1, A2, A3, B1, B2, B3, B4, C1, C2 & C3 and new proposed Block D1, D2 & D3 to the north of Stapolin Square (an extended site boundary).

The proposed alterations result in an increase of 437 units overall. Should this alteration application be permitted by An Bord Pleanála, the altered F16A.0412, ABP-248970 (as previously amended) will permit the development of 981 units in total.

This statement of consistency with planning policy has been prepared to specifically address the requirements of the strategic housing development guidance document issued by An Bord Pleanála. This SHD Planning Application is also accompanied by a Planning Report which includes further details in respect of the proposed development in relation to the site location and context, the development description and the relevant planning history.

This standalone planning policy consistency statement, prepared by Brady Shipman Martin, demonstrates that the proposal is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy. It should be read in conjunction with the accompanying detailed documentation prepared by

HJL Architects, Bernard Seymour Landscape Architects (BSLA), Brady Shipman Martin, OCSC, CS Consulting Group and other design team members.

For further details of consistency with the quantitative standards for residential units as set down in the Sustainable Urban Housing: Design Standards for New Apartments (2018) and the Fingal County Development Plan, please refer to the Housing Quality Assessment and other Schedules and Document prepared by HJL Architects and the Planning Report and Material Contravention included in this SHD Application.

## 2 CONSISTENCY WITH PLANNING POLICY

### 2.1 National and Regional Planning Policy

The key provisions of national (including relevant Section 28 guidelines) and regional planning policy as it relates to the proposed development is set out in the following sections. The key policy and guidance documents of relevance to the proposed development are as follows:

- Rebuilding Ireland – Action Plan for Housing and Homelessness
- Project Ireland 2040 - National Planning Framework,
- Eastern and Midland Regional Assembly - Regional Spatial & Economic Strategy (RSES)
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines - Quality Housing for Sustainable Communities;
- Sustainable Urban Housing: Design Standards for New Apartments (2020)
- Design Manual for Urban Roads and Streets (2013);
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Smarter Travel – A New Transport Policy for Ireland (2009-2020);
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)
- The Planning System and Flood Risk Management (2009); and
- Birds and Habitats Directive – Appropriate Assessment;
- EIA Directive

### 2.1.1 Rebuilding Ireland – Action Plan for Housing and Homelessness

Rebuilding Ireland is the Government’s Action Plan for Housing and Homelessness, launched in 2016. The Plan’s aim is to accelerate housing supply by addressing the needs of homeless people and families in emergency accommodation, accelerate the provision of social housing, deliver more housing, utilise vacant homes and improve the rental sector.

The Plan contains five key pillars:

- Pillar 1 – Address Homelessness: Provide early solutions to address the unacceptable level of families in emergency accommodation; deliver inter-agency supports for people who are currently homeless, with a particular emphasis on minimising the incidence of rough sleeping, and enhance State supports to keep people in their own homes.
- Pillar 2 – Accelerate Social Housing: Increase the level and speed of delivery of social housing and other State-supported housing.
- Pillar 3 – Build More Homes: Increase the output of private housing to meet demand at affordable prices.
- Pillar 4 – Improve the Rental Sector: Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.
- Pillar 5 – Utilise Existing Housing: Ensure that existing housing stock is used to the maximum degree possible - focusing on measures to use vacant stock to renew urban and rural areas.

The proposed development at Baldoyle is consistent with Pillar 2, 3 and Pillar 4 as the scheme is proposing to alter and existing permitted development, increase the proposed density and quantum of the scheme, providing for both apartments and houses on a highly accessible site location within the North fringes of Dublin City. The scheme also provides for Part V social housing units.

Under the Rebuilding Ireland Programme, Local Infrastructure Housing Activation Fund (LIHAF), of €6.1 million, has been allocated to Fingal County Council in respect of Baldoyle & Stapolin. The Local Infrastructure Housing Activation Fund (LIHAF) is a key element of Pillar 3 of Rebuilding Ireland: An Action Plan for Housing & Homelessness. The objective of the fund is to provide public off-site infrastructure to relieve critical infrastructure blockages. This will enable the accelerated delivery of housing on key development sites in Dublin and in urban areas of high demand for housing.

In respect of Baldoyle-Stapolin the LIHAF descriptions states:

*This is a **Major Urban Housing Development Site**. This proposal includes four elements and will release lands identified in the Baldoyle Local Area Plan 2013 for the delivery of approximately 800 residential units. The*

*proposal includes a Ramp to provide pedestrian and cyclist access to Clongriffin Train Station & attenuation areas (constructed wetland), a regional park and a 'Hole in Wall' staggered junction upgrade works which facilitates the full delivery potential for housing in the Stapolin LAP lands, Portmarnock LAP lands & wider North City Fringe area.*

*This proposal includes four elements and will release lands identified in the Baldoyle Local Area Plan 2013 for the delivery of approximately 800 residential units.*

The proposed public infrastructure included in this funding include key elements of the permitted development, which this alteration application seeks to further optimise:-

- A ramp to provide pedestrian and cyclist access to Clongriffin Train Station
- Attenuation areas (constructed wetland),
- A regional park
- 'Hole in Wall' staggered junction upgrade works.

Given the importance of the LIHAF Funding which identifies these lands a **Major Urban Housing Development Site** [their emphasis] it is considered that this is a strategic project of national importance.

#### **2.1.2 Project Ireland 2040 National Planning Framework (Published 16/02/2018)**

Project Ireland 2040 is the Government's plan to 're-imagine' Ireland and prepare for the future. Project Ireland 2040 seeks to achieve ten strategic outcomes (common to both Plans), building around the overarching themes of wellbeing, equality and opportunity, including:

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

Project Ireland 2040 contains two key plans: the National Planning Framework (NPF); and the National Development Plan Framework (NDP) which, in tandem, set out infrastructure priorities and plan regional development for the country.

The NPF is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The plan identifies that by 2040 it is expected that an additional one million people will live in Ireland, an additional two-thirds of a million people will work here. These are huge increases: more people will be travelling to work, school and universities, more buildings will be needed to accommodate them, clean water will be needed for homes, farms and industry, more and better care facilities will be required for the elderly.

One of the key objectives of the NPF relates to compact growth. The plan seeks to carefully manage the sustainable growth of compact cities, towns and villages and to add value and create more attractive places in which people can live and work. The NPF identifies that activating '*strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development*' as a top priority.

With regards to Dublin the NPF identifies that the city needs to '*accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice*'.

National Policy Objective 4 in this regards states:

*Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*

National Policy Objective 11 in this regards states:

*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.*

National Policy Objective 13 in this regards states:

*In urban areas, planning and related standards, including in particular 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.*



The NPF requires homes to be located in places that can support sustainable development. This includes places that are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change. The alteration to the permitted development is responding to the existing strong demand in the area and in a location that is highly accessible to both existing local facilities and public transport routes to the City Centre and as such development as proposed with increased height and density.

### 2.1.3 Eastern and Midland Regional Assembly –Regional Spatial & Economic Strategy (RSES)

The Regional Spatial and Economic Strategy (RSES) is a strategic plan and investment framework to shape the future development of the Eastern & Midland Region to 2031 and beyond. The region is the smallest in terms of land area but the largest in population size and is identified as the primary economic engine of the state.

*The Strategy identifies that the region ‘is home to over 800,000 households, with 4 out of 5 living in conventional housing while apartments account for around 18% of our housing stock. One of the challenges facing the region is the continued growth rates of household formation coupled with a severe slowdown in the development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the region’.*

The Strategy is underpinned by key principles that reflect the three pillars of sustainability; Social, Environmental and Economic, and expressed in a manner which best reflects the challenges and opportunities of the Region. The plan identifies that the central need is for the RSES to be people focussed, as ‘quality of life’ encapsulates strong economic output and stability, good environmental performance and a good standard of living for all.

The subject site is located within the Dublin Metropolitan Area, as designated by the Strategy. The Metropolitan Area Strategic Plan (MASP) which is part of the RSES seeks to focus on a number of large scale strategic sites, based on key corridors that will deliver significant development in an integrated and sustainable fashion.

In relation to Baldoyle the RSES states identifies Clongriffin-Belmayne and Baldoyle - Stapolin as being within Dublin City and its suburbs, and forming part of the ‘North Fringe’ which offers large scale urban expansion creating new communities along the North-South (DART) Strategic Development Corridor (Northern/south-eastern commuter lines and DART expansion programme).

## SHORELINE GA01 LANDS BALDOYLE SHD

### Statement of Consistency

The RSES sets out the North – South Corridor (DART expansion) as a key infrastructure project to be delivered by 2027 and which will increase capacity on the northern commuter line and support ongoing large-scale urban expansion of the North Fringe lands and Donabate.

Corridor	Residential	Employment/ Mixed Use	Phasing/Enabling infrastructure
<b>North-South corridor (DART)</b> <b>Population capacity</b> <b>Short 31,000</b> <b>Medium 13,000</b> <b>Long 7,000</b> <b>Total 51,000</b>	North Fringe – large scale urban expansion creating new communities at Clongriffin-Belmayne (Dublin City) and Baldoyle-Stapolin (Fingal)	Completion of mixed-use districts with retail and service provision.	Short to medium term Access to rail station, bus upgrades, new road connections, drainage, parks and social infrastructure

The NPF also sets out ambitious targets to achieve compact growth with 50% of housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. To achieve this *‘the MASP identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities. These include; ... large scale urban expansion on the North Fringe of the city...’*,

The Strategy goes on to state that The DART Expansion Programme, to be delivered by 2027 will increase capacity on the northern commuter line and support ongoing large-scale urban expansion of the North Fringe lands and Donabate.

Policy Objectives relating to Housing Delivery include:

*RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’ ‘Sustainable Urban Housing; Design Standards for New Apartments’ Guidelines, and ‘Urban Development and Building Heights Guidelines for Planning Authorities’.*

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

The aim of these guidelines is to set out the key planning principles which should guide the delivery of residential development in urban areas. The Guidelines

provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. In this regard, the Guidelines are accompanied by a Design Manual discussed in the section below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

The Guidelines reinforce that planning authorities *‘should promote increased residential densities in appropriate locations, including city and larger town centres’* and that *‘firm emphasis must be placed by planning authorities on the importance of qualitative standards in relation to design and layout in order to ensure that the highest quality of residential environment is achieved’*.

These qualitative standards have been brought through in the Design Manual as referenced above, the Fingal County Development Plan and in the Sustainable Urban Housing: Design Standards for New Apartments which have guided the design approach of the scheme. This is set out in detail in the accompanying Design Statement prepared by HJL Architects.

In identifying appropriate locations for increased density the Guidelines note that City and town centres offer *‘the greatest potential for the creation of sustainable patterns of development’* and of which in particular brownfield sites should be promoted.

Having regard to the above the Core Strategy of the Development Plan promotes the continued consolidation of the existing zoned lands and to maximise the efficient use of existing and proposed infrastructure. In this way the Council can ensure an integrated land use and transport strategy in line with national and regional policy.

To maximise the return on public transport investment the Guidelines identify that it is important that land use planning underpins the efficiency of public transport services by sustainable settlement patterns – including higher densities – on lands within existing or planned transport corridors- this includes 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station.

This underutilised greenfield site is located adjacent an existing DART station, bus route, and will be serviced in the future by an upgraded BusConnects route.

In respect to pre-application consultations with the Planning Authority and An Bord Pleanála the design team had regard to the advice set down in the ‘In Practice’ section of the Urban Design Manual (2009).

### 2.1.5 Urban Design Manual – A Best Practice Guide (2009)

The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications. These are listed below, with a response to each provided, and should be read in conjunction with the Architect's Design Statement.

***Context: How does the development respond to its surroundings?***

The proposed development has been designed to respond positively to the existing established, and permitted residential communities in the area which comprise a wide mix of housing types. To the west, existing and permitted residential development in Clongriffin primarily includes newer apartment developments. To the south and east, residential development in the Red Arches and Myrtle primarily include newer apartment developments also.

Existing established residential areas to the south east comprise a mix of 1 and 2 storey detached and semi-detached housing. The layout and the scaling of the site has responded to these adjacencies ensuring minimal impact on residential amenity while at the same time providing an appropriate transition height and type.

The streetscape and buildings have been arranged to enhance the sense of connection to the village centre and the surrounding parks.

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

The lands at Baldoyle are located immediately east of the Clongriffin DART station. The lands are accessed from the Coast Road (R106) to the East via Red Arches Road and the Grange Road (R809) via Longfield Road to the south. Existing Pedestrian access across the DART line remains unchanged.

The Clongriffin area to the west has undergone significant change in recent years, while to the east there has been very little development in recent years.

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

The proposed development will be accessed at multiple locations by a range of ways including bus routes, motorcar, pedestrian and cyclist facilities. Primary vehicular routes are provided primarily via Myrtle Avenue, Red Arches Road and Longfield Road. Motor traffic is present only where required, with measures taken to prioritise the pedestrian and the cyclist within the public realm.

The site is immediately adjacent to Clongriffin DART station connecting the site with the wider Dublin Area. Clongriffin is also served by Dublin Bus No. 15. It is

also anticipated that Clongriffin will be served by a future upgraded Busconnects route (Core Bus Corridor Route No. 1<sup>1</sup>).

The site is within short walking distance of the Baldoyle Industrial Estate providing a large amount of employment and commercial activity.

The proposed development provides for a mix of cycle paths types which will enable improved connections with the wider Dublin cycle path network including the Baldoyle to Portmarnock cycle route and public transport at Clongriffin.

Existing provision of cycle paths in the area are mixed. Red Arches Road and Myrtle Close have cycle paths separated from the road but only for a portion of the road. Other cycle facilities in the area are located along, Stapolin Avenue, Longfield Road, and Parker House however these are disconnected from the wider area.

Fingal County Council are currently close to completing a high quality segregate cycle route from Baldoyle along the R106 Coast Road to Portmarnock which will form part of a longer route along the coast.

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

In terms of residential mix, the proposed scheme provides for a good mix of unit types by providing studios, 1-bed, 2 bed and 3- bed apartments and 2-bed, 3 bed and 4 –bed houses.

The site also provides for a significant quantum of other amenity and commercial uses which will provide primarily for future residents but also some local services for existing residents:

Use	Size (sqm)
Gym	411
Convenience Store	915
Medical Centre	462
Pharmacy	268
Crèche (+External Area)	539 (+123)
Storage Units	292
Retail/Restaurant/Café Unit	484.5
Retail/Restaurant/Café Unit	111.5

<sup>1</sup> <https://busconnects.ie/media/1816/01-clongriffin-to-city-centre-preferred-route-180220-fa-web.pdf>

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

It is considered that the site, given location and context, represents a significantly underutilised greenfield site. The site is located directly adjacent the Clongriffin DART station enabling convenient access to Dublin City Centre and other high quality public transport links. The site is an extension of the Northern Fringe of Dublin City.

The scheme as proposed to be altered will provide 882 residential units, an increase of 437 units and 981 in total under the parent permission resulting in a population of approx. 2,361.15, based upon an average household occupancy of 2.65 for new development areas in the area (2.3 per apartments and 3 for houses), in addition to new retail, community and employment uses.

The scheme, as proposed to be amended increases the density from permitted level of c.67u/ha to a density of c.99 u/ha as a result of the wider development strategy. The proposed layout and proposed heights correspond with the LAP. Higher density buildings been located close to Clongriffin Station and lower density buildings to the East (in relation to the surrounding lower density developments). The proposed development makes optimum use of pre-existing infrastructural investment including high quality public transport without compromising residential amenities of future or existing residents.

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

The proposed scheme contains a variety and mix of building designs, heights and materials in this emerging residential area, in addition to c. 1ha. of Class 2 open space within the redline boundary, which combined contribute to creating a sense of place on this significant site.

The streetscape and buildings have been arranged to enhance the sense of connection to the village centre and the surrounding parks. There are two main primary 'green arteries' through the scheme; Longfield Road provides a clear, legible orientation towards Racecourse Park and Stapolin road connects the village centre to the Haggard. These green links relate physically and visually to a number of public and communal open spaces at ground and podium levels which emphasise the position of landscape at the heart of the scheme.

Key buildings such as the taller buildings are located within the site, adjacent to Stapolin Square and Clongriffin Station.

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

Within the scheme, there is a range of pedestrian facilities, public open space and public routes green spaces. Active frontages are provided along the main

routes and new public spaces supported by a network of public open spaces and routes, easily accessed from all residential units provides for a people friendly development.

***Adaptability: How will the buildings cope with change?***

The ground floor commercial uses have been designed to meet a wide range of uses including a retail, medical units, café, crèche etc. This type of design and layout lends itself ready to change if required.

Each of the proposed dwellings meets or exceed the minimum standards for residential unit size. The development provides a mix of studios 1, 2, and 3, bedroom apartment units that can allow for occupancy as life cycles and personal needs of each resident change.

The 3 and 4 bed house units have adaptable roof spaces to allow for individuals and families to extend their homes if required, and subject to proper planning.

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

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

As the scheme is accessed and used by number of users i.e. residents, employees, shoppers and visitors to the adjacent park.

The proposed public spaces are the key focus of the scheme as it will be accessed by all the users identified above. As such the spaces must be attractive, flexible and secure.

In terms of the residential amenity spaces these are at the centrally located around residential blocks ensuring a more calm and private space away from the busier public spaces. These spaces have a number of residential blocks overlooking them, and have public routes through them, ensuring a level of security. The landscape rationale for these spaces has been to provide a range of features to facilitate both active uses i.e. play spaces and more relaxed amenity i.e. seating areas. The design ensures privacy in the spaces but allows for passive security from adjoining blocks and entrances ensuring a sense of security.

***Parking: How will the parking be secure and attractive?***

Car parking is primarily located at ground floor level (below podium for the apartments) and on street adjacent to houses and duplex units. This ensures close proximity to a units designated parking spot and security in either surveillance in terms of the on street spaces and controlled access to the apartment spaces.

In addition, 1,542 no. cycle parking spaces. These spaces for the various users of the scheme including provided for all users in secure locations. All residential and long term users facilities are provide in secure spaces and more flexible parking is provided in the public realm for short term stays.

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

The proposed design of the development has been subject to a number of pre-application consultations between the design team and the Planning Authority. The design rationale from an urban design and architectural perspective is explained in the Design Statement prepared by HJL.

The landscape design rationale is set out in the Landscape Design Statement prepared by BSLA. Stapolin Square is the focus of the landscape design strategy for the scheme, this central public space provides for informal amenity, public realms, seating and tree planting while the shared residential courtyards provide for amenity and recreation and sense of place. The proposed development provides c. 1 ha (not including the Haggard at c.15,000 sqm / 1.5ha) public open space, far exceeding the Development Plan standards under FCC Objective DMS57A.

The proposed development also entails a large quantity of semi-private open space. The development benefits from its adjacency to the significant amenity of Racecourse Park, comprising some c.112 ha of Class 1 Public Open Space and which includes cycle and walking trails, playspaces and sports pitches.

Full details on the rationale for the landscaping design can be found in the Landscape Design Rationale and Landscape plans prepared by BSLA which accompanies this Planning Application.

#### **2.1.6 Sustainable Urban Housing: Design Standards for New Apartments (December 2020)**

The Sustainable Urban Housing Design Standards for New Apartments (Apartment Guidelines) were approved by the Minister for Housing, Planning and Local Government and published in March 2018, and updated in December 2020 in relation to Shared Accommodation only. The guidelines update previous guidance from 2015 and note that this is done so *in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness Rebuilding Ireland and Project Ireland 2040 and the National Planning Framework, published since the 2015 guidelines.*

The Guidelines note that the NPF projects a need for a minimum of 550,000 new homes, at least half of which are targeted for provision in Ireland's five cities and



of particular relevance to this site it notes a shift in Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to where jobs and services are located, which requires at least half of new homes within Ireland's cities to be provided within the current built-up area of each, i.e. on sites within the existing urban 'envelope'.

The Guidelines have been updated, from the previous 2015 Guidelines, to amend and address new areas including:

- Enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;
- Make better provision for building refurbishment and small-scale urban infill schemes;
- Address the emerging 'build to rent' and 'shared accommodation' sectors; and
- Remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs.

The subject site represents a significant development on highly accessible residentially zoned lands at the Northern Fringe of Dublin City and as such represents a project that is fully supported by these Guidelines.

The Guidelines identify Central/Accessible Urban Locations which are suited to higher density development. The subject site falls within this category as it is a '*Site within reasonable walking distance to/from high capacity urban public transport stops*'. In addition the subject site is located within walking distance of the Ballydoyle Industrial Estate. As highlighted elsewhere in this Report it is anticipated that Clongriffin will be served by Bus connects Core Route Corridor.

This SHD Planning Application is accompanied by a Housing Quality Assessment, prepared by HJL Architects which demonstrates the compliance of the proposed development with the relevant quantitative standards required under the Apartment Guidelines.

The HQA illustrates in tabular format how each apartment within the proposed scheme meets or exceeds the relevant standards as set out in the Guidelines including SPPR3: Minimum Apartment Floor Areas and SPPR 4: Dual Aspect Apartments.

Another key update in the Guidelines is the ability to reduce car parking standards. The Guidelines identify that '*in larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances*'.

The scheme as proposed includes for car parking at a rate of 0.54 per unit which is justified given the site's accessibility to public transport and employment zones.

With regards to cycle parking, the proposed scheme exceeds the standards as set out in the Fingal County Development Plan and not Section 4.15 of the Guidelines as this is a suggested standard and not an SPPR. The Transport Impact Assessment provides a justification for this level of cycle parking.

### **2.1.7 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)**

The Urban Building Height Guidelines identify that as reflected in *'the National Planning Framework .... that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas'* and that *'securing compact and sustainable urban growth means focusing on reusing previously developed 'brownfield' land, building up infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings, in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities'*.

The Guidelines reference NPO 13 (from the NPF) which states that *'in urban areas, planning and related standards, including in particular 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'*.

It recognises that in meeting the challenge set out above new approaches to urban planning and development are required and that securing an effective mix of uses within urban centres is critical. To bring about this increased density and increased residential development in urban centres the Guidelines state that *'significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels'*.

The scheme, as proposed to be altered by this SHD Planning Application, seeks achieve greater height and density over the permitted development. The site's suitability for this approach is set out in detail, as considered against the Guidelines in the accompanying Planning Report. It is considered that, the subject site, it is submitted, is a good example of a site which that can achieve increased

building height and resulting increased density, on a highly accessible site within the a key urban centre of County Dublin.

#### 2.1.8 Design Manual for Urban Roads and Streets (DMURS) (2013)

The Design Manual for Urban Roads and Streets (DMURS), was adopted by the Department of Transport and the Department of Environment (now Housing) in 2013. It sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. The DMURS Compliance Statement, prepared by CS Consulting Engineers provides further detail in respect of the compliance of the proposed development with DMURS.

The scheme proposals are the outcome of an integrated urban design and landscaping to create lower traffic speeds through the development and thereby facilitating a safer environment for pedestrians and cyclists. CS Consulting Group along with the rest of the design team have interrogated the DMURS principles to ensure the final layout provides a high quality urban extension in proximity to the Docklands. CS Consulting prepared a DMURS Statement of Consistency which accompanies this planning application documentation.

#### 2.1.9 Guidelines for Planning Authorities on Childcare Facilities (2001)

Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings.

However the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)* state that:

*‘Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms’.*

The proposed scheme contains 28% studios and one bed units which as per the above, the studios and one bed units, at a minimum, should be discounted in the calculation of the requirement for childcare places.

In addition, given the scale of development existing, under construction and permitted for the area, an assessment of the childcare provisions was carried out as part of this development assessment. The assessment carried out found that there are a number of crèches operating in the area and a number of new crèches permitted in the area to cater for existing and new populations.

It was considered that the proposed crèche will meet future residents demand for childcare facilities. Please see enclosed Schools Demand and Childcare Facilities Assessment prepared by BSM for further details.

#### **2.1.10 Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020**

The Smarter Transport objective contained within Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020 outlines the Government vision that the key goals to achieve transport sustainability are:

- i) to reduce overall travel demand
- ii) to maximise the efficiency of the transport network
- iii) to reduce reliance on fossil fuels
- iv) to reduce transport emissions and
- v) to improve accessibility to transport

The key targets that the Smarter Travel Policy sets to achieve these goals area:

- Future population and employment growth will predominantly take place in sustainable compact forms, which reduce the need to travel for employment and services
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels
- A reduction will be achieved on the 2005 figure for greenhouse gas emissions from the transport sector.

The subject site encourages sustainable and smarter travel by providing high density development on greenfield lands in close proximity to high frequency public transport connecting the site with employment areas within Dublin City. In addition through the reduction of car parking and provision of significant cycle facilities.

#### 2.1.11 Transport Strategy for the Greater Dublin Area 2016 – 2035

The Transport Strategy for the Greater Dublin Area 2016 – 2035, as prepared by the National Transport Authority, provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA) over the next two decades. It also provides a transport planning policy around which statutory agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing, water and power, can align their investment priorities. It is, therefore, an essential component, along with investment programmes in other sectors, for the orderly development of the Greater Dublin Area over the next 20 years.

The Strategy identifies the challenges for transport in the GDA as being:

- An assumed return to sustained economic growth;
- Substantial population growth;
- Full employment;
- That no one is excluded from society, by virtue of the design and layout of transport infrastructure and services or by the cost of public transport use; and
- That the environment in the GDA is protected and enhanced.

It is considered that since the publication of the Strategy in 2016 economic and population growth has continued to substantially increase and as such the objective of the plan are critical to ensuring a functional GDA region.

As such the proposed development is consistent with the objectives of the GDA Transport Strategy by developing employment and residential development in proximity to each other and proximate to existing employment and public transport networks thereby reducing the requirement on the car and encouraging a shift to more sustainable transport methods.

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

These Guidelines introduce comprehensive mechanisms for the incorporation of flood risk identification and management into the planning process. In accordance with the *Planning System and Flood Risk Management Guidelines a Site-Specific Flood Risk Assessment* (SSFRA) has been prepared for the current application by CS Consulting. The primary objective of the SSFRA is to inform a site design that can manage the impacts of surface water across the site without negatively impacting areas off the site.

This Site Specific Flood Risk Assessment for the office development at Baldoyle was undertaken in accordance with the requirements of the “*Planning System and Flood Risk Management Guidelines for Planning Authorities*”, November 2009.

The SSFRA did not find any indicators of the proposed development being at risk from fluvial, pluvial or groundwater flooding; also, the SSFRA did not find any indicators that the proposed development will give rise to flood risk elsewhere.

#### **2.1.13 Birds and Habitats Directive – Appropriate Assessment**

Under Article 6(3) of the EU Habitats Directive and Regulation 30 of SI no. 94/1997 European Communities (Natural Habitats) Regulations (1997) any plan or project which has the potential to significantly impact on the integrity of a Natura 2000 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under Section 177 (U) of the Planning and Development Act 2000-2010.

An Appropriate Assessment is required if likely significant effects on Natura 2000 sites arising from a proposed development cannot be ruled out at the screening stage, either alone or in combination with other plans or projects.

We refer the Planning Authority to the Appropriate Assessment Screening Report and Natura Impact Assessment Report prepared by Altemaar that accompanies this application.

#### **2.1.14 EIA Directive**

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4 (2) outlines Annex 2 projects that require consideration for EIA further to a case by case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case by case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations.

As the proposed development is over 500 residential being the thresholds for mandatory EIA, an Environmental Impact Assessment Report has been prepared as part of this Strategic Housing Development Planning Application.

## 2.2 Local Planning Policy

This section provides an overview of consistency with local planning policy. The site is located within the administrative area of Fingal County Council and is therefore subject to the land use policies and objectives of the Fingal County Development Plan 2017-2023, as varied. In addition, the Baldoyle - Stapolin LAP 2013-2023 provides specific detail in relation to the lands. Where the LAP does not provide detail we have regarded to the County Development Plan.

### 2.2.1 Fingal County Development Plan 2017 - 2023.

#### Zoning

The subject site is zoned RA 'new residential'. The objective of RA zoned lands is to *'provide for new residential communities subject to the provision of the necessary social and physical infrastructure.'* Given the primary purpose of the subject application is to provide for residential uses the proposed development is clearly consistent with the land-use zoning. Further detail provided by the Development Plan states: *Ensure the provision of high quality new residential environments with good layout and design, with adequate public transport and cycle links and within walking distance of community facilities. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.*

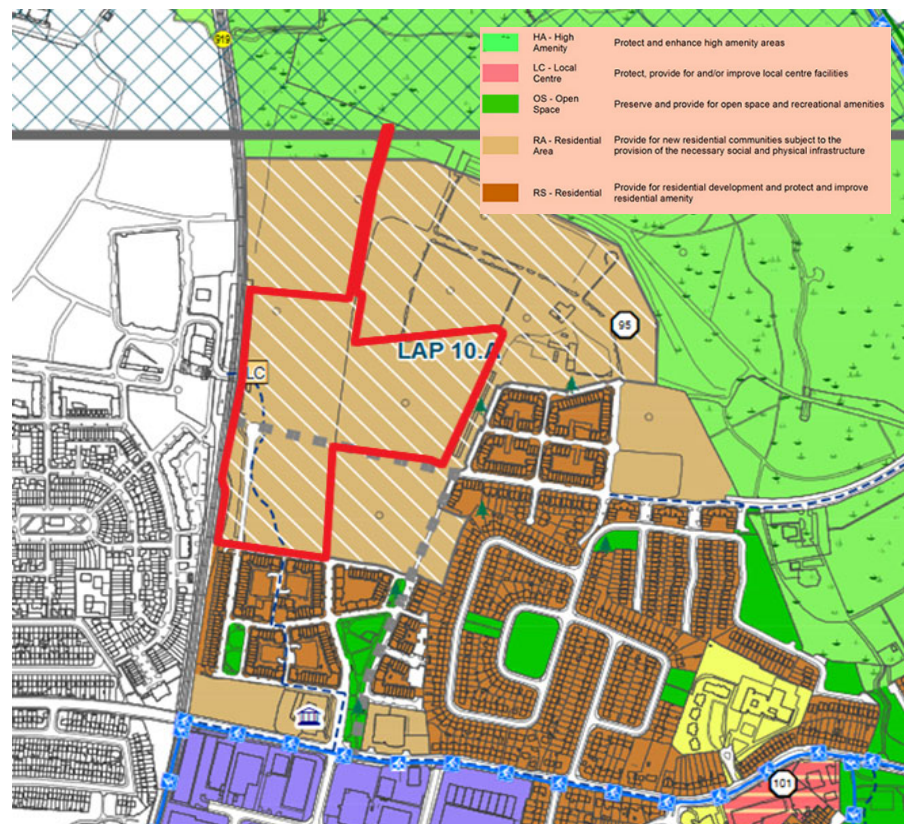


Figure 2.1: extract from the Fingal Development Plan Zoning Map 10 (Source: FCC, 2019).



## SHORELINE GA01 LANDS BALDOYLE SHD

### Statement of Consistency

The following uses are considered permitted in principle:

*Amusement Arcade\* Bed and Breakfast Betting Office\* Childcare Facilities  
Community Facility Education Funeral Home/Mortuary\* Guest House Health  
Centre Health Practitioner Hospital Office Ancillary to Permitted Use Office ≤  
100sqm\* Office > 100sqm and < 1,000sqm<sup>11</sup> Open Space Place of Worship  
Public House\* Public Transport Station Recreational Facility/Sports Club  
Residential Residential Care Home/ Retirement Home Restaurant/Café\* Retail  
- Local < 150 sqm nfa Retail - Convenience ≤ 500 sqm nfa\* Retail - Comparison  
≤ 500 sqm nfa\* Retail - Supermarket ≤ 2,500 sqm nfa\* Retirement Village  
Sheltered Accommodation Sustainable Energy Installation Taxi Office Traveller  
Community Accommodation Utility Installations Veterinary Clinic*

*\* In a local centre only*

### Core Strategy

Chapter 2 of the Development Plan sets out the Core Strategy and Settlement Strategy for County Fingal. It identifies the quantum, location and phasing of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy. It reflects the availability of existing services, planned investment, sequential development and environmental requirements (i.e. an evidence based approach in determining the suitability of lands for zoning purposes) and therefore also provides the policy framework for all Local Area Plans.

The Core Strategy aligns the Development Plan with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as amended by Variation<sup>2</sup> No 2 to the Fingal Development Plan to align the Fingal Development Plan with the NPF and the RSES. This Variation was approved by FCC Councillors in June 2020.. Variation No. 2 has not fundamentally changed the Baldoyle policy context. Baldoyle is located in the Metropolitan Area of the Greater Dublin Area (GDA).

Baldoyle is located in the Metropolitan Area of the Greater Dublin Area (GDA). The Development Plan (as varied) sets out the residential capacity of the wider area in Table 2.1, with the details extracted below relevant to the subject lands:

Town/Village	Remaining Land Supply (hectares)	Remaining Capacity Residential Units
Metropolitan Area		
Baldoyle/Sutton	29	1498

We note, Objective SS01 aims to: *Consolidate the vast majority of the County's future growth into the strong and dynamic urban centres of the Metropolitan*

<sup>2</sup> <https://consult.fingal.ie/en/consultation/proposed-variation-no-2-fingal-development-plan-2017-2023>



*Area while directing development in the core to towns and villages, as advocated by national and regional planning guidance.*

The development strategy of the subject lands seeks to utilise existing infrastructure such as roads and public transport in an area which has been designated to be consolidated within Dublin's North Fringe.

Baldoyle is considered a 'Consolidation Areas within the Metropolitan Area. The policy approach in these areas is *'to gain maximum benefit from existing transport, social, and community infrastructure through the continued consolidation of the city and its suburbs. Future development will happen in a planned and efficient manner utilising **opportunities to achieve increased densities where appropriate.***'

Further Objective SS16 aims: *Examine the possibility of achieving higher densities in urban areas adjoining Dublin City where such an approach would be in keeping with the character and form of existing residential communities, or would otherwise be appropriate in the context of the site.*

### Place Making

Fingal County Council aims to achieve successful and sustainable communities throughout the County. Chapter 3 sets out the role of the Development Plan in this regard.

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

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

### Housing Strategy

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

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

inclusive communities, which offer a choice of housing and lifestyles, have been proven to provide a number of community benefits.

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

Baldoyle is described as ‘a Consolidation Area within a Metropolitan Area’ in the Fingal Settlement Strategy. The Development Plan states ‘*There are a number of settlements across the County which have their own distinct character and sense of place but given their location in close proximity to Dublin City, respectively form consolidation areas within the Metropolitan Area. These areas include **Baldoyle**, Castleknock, Clonsilla, Howth, Mulhuddart, Portmarnock, Sutton, and parts of the city suburbs located close to the M50 motorway.*

*The policy approach in these areas will be to gain maximum benefit from existing transport, social, and community infrastructure through the continued consolidation of the city and its suburbs. Future development will happen in a planned and efficient manner utilising opportunities to achieve increased densities where appropriate.*

The following general objectives relate the residential development in Fingal:

<b>Objective PM37</b>	<i>Ensure an holistic approach, which incorporates the provision of essential and appropriate facilities, amenities and services, is taken in the design and planning of new residential areas, so as to ensure that viable sustainable communities emerge and grow.</i>
<b>Objective PM38</b>	<i>Achieve an appropriate dwelling mix, size, type, tenure in all new residential developments.</i>
<b>Objective PM39</b>	<i>Ensure consolidated development in Fingal by facilitating residential development in existing urban and village locations.</i>
<b>Objective PM40</b>	<i>Ensure a mix and range of housing types are provided in all residential areas to meet the diverse needs of residents.</i>
<b>Objective PM41</b>	<i>Encourage increased densities at appropriate locations whilst ensuring that the quality of place, residential accommodation and amenities for either existing or future residents are not compromised.</i>

The proposed residential development proposes a suitable density of 99 units per ha to optimise use of the lands which are zoned and highly accessible. The lands are also adjacent to emerging and recently developed urban areas. It is

submitted that the proposed development is consistent with the objectives and vision of Fingal County Development Plan Core and Housing Strategies, therefore ensuring consistency with National and Regional policy.

### Energy Efficiency and Climate Change

Objective PM29 aims to: *Promote energy efficiency and conservation above Building Regulations standards in the design and development of all new buildings and residential schemes in particular and require designers to demonstrate that they have taken maximising energy efficiency and the use of renewable energy into account in their planning application.*

The proposed development has maximised energy efficiency and the use of renewable energy in the scheme. Please see Sustainability/ Energy Report prepared by O'Connor Sutton Cronin included within this Planning Application for further details of the approach.

### Part V – Social Housing

Pursuant to Part V of the Planning and Development Act, 2000 (as amended) which refers to the requirement to provide 10% of social housing of which will be applied to planning permissions for housing on lands zoned for residential use and mixed use development. As evident in correspondence included within the Planning Application, the Applicant has engaged Fingal County Council in order to confirm the provision of social housing units.

### Natural Heritage and Landscape Considerations

Fingal Development Plan Map 14-16 set out the following objectives and designations relating to the area proximate to the subject lands:

<b>Map 14</b>	<p>'Highly Sensitive Landscape'</p> <p><b>GMI 1:</b> Provide new Active Recreation Hubs in Bremore Regional Park, St.Catherine 's Park (Rush), Lusk, Donabate , Moore town/Old town (Sword s), Drinan, <b>Baldoyle Race course Park</b> and Phoenix Park Race course</p> <p><b>GMI 2:</b> Provide new Regional Parks at the following locations: Baleally Lane , Moore town/Old town (Swords), <b>Baldoyle</b>, and Dunsink subject to Appropriate Assessment screening</p>
<b>Map 15</b>	Ecological Buffer Zone
<b>Map 16</b>	<ul style="list-style-type: none"> <li>• Poor diversity of species as a result of serious pollution problems define s 'poor' status water bodies</li> <li>• 1% (1 in 100) chance of flood event occurring in any one year</li> <li>• 0.1% (1 in 1000) chance of flood event occurring in any one year</li> </ul>

The Development Plan considers the subject lands as 'Estuary Character Type' which has a high sensitivity to development and exceptional value. The Baldoyle Estuary is one of three large sand spits which are have protected estuarine and saltmarsh habitats of ornithological and ecological interest. Balydoyle is also a

designated Natura 2000 Site (Special Protection Areas and Special Areas of Conservation), Natural Heritage Area and Ramsar site.

The Development Plan states that the flat horizontal nature of estuaries means that views are generally contained within the low hills and dunes that enclose these areas.

Further the Development Plan states that the Estuary Character Type is categorised as having an exceptional value, recognised by the EU designations (SAC and SPA) that apply to each in addition to national designations such as proposed Natural Heritage Areas and Ramsar. The aesthetic quality of the estuaries is also outstanding.

In this regard the development Plan sets out a series of objectives (NH33-NH39) include Objective NH33 which aims to: *Ensure the preservation of the uniqueness of a landscape character type by having regard to the character, value and sensitivity of a landscape when determining a planning application.*

The proposed development has considered the above issues at an early stage in the development process. This Application includes all necessary assessments in relation to ecology, Appropriate Assessment, Environmental Impact Assessment, visual impact assessments resulting in a high standards of siting and design

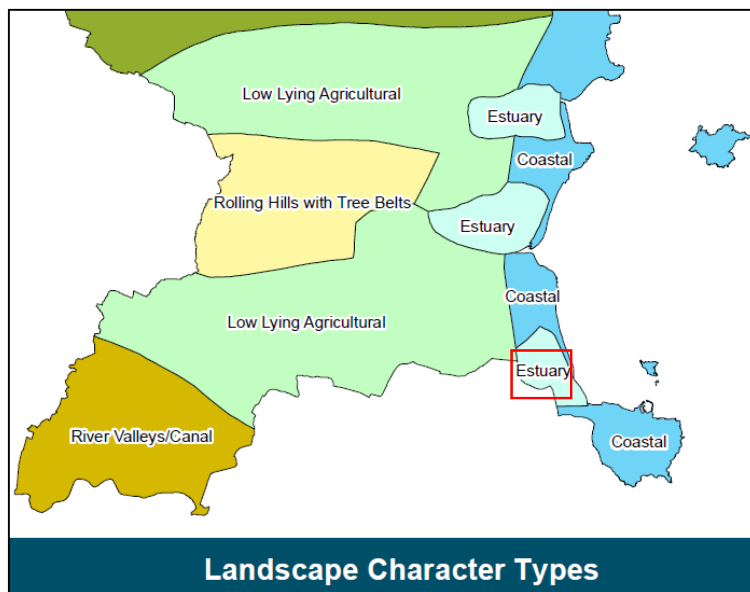


Figure 2.2: Extract from the Fingal Development Plan Green Infrastructure Map 14 (Source: FCC, 2019).

## Common Principles for all Planning Applications

The proposed development adheres to the following guidelines applicable to all planning applications:

### Environmental Assessment

The proposed development complies with the following environmental criteria:

**Objective DMS01 aims to:** *Ensure that all plans and projects in the County which could, either individually or in combination with other plans and projects, have a significant effect on a European site or sites are subject to Screening for Appropriate Assessment.*

**Objective DMS02 aims to:** *Ensure Local Authority development proposals are subject to environmental assessment, as appropriate, including Screening for Appropriate Assessment and Environmental Impact Assessment.*

### Design Criteria for Residential Development

The proposed development complies with the following design criteria:

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

**Objective PM41** *Encourage increased densities at appropriate locations whilst ensuring that the quality of place, residential accommodation and amenities for either existing or future residents are not compromised.*

### 2.2.2 Baldoye-Stapolin LAP 2013-2023

Adopted in May 2013 by FCC, the County Council Members, having considered the Chief Executive's Report at a Council meeting on the 12<sup>th</sup> March 2018 decided to approve the extension of the life of the Baldoye-Stapolin LAP 2013-2019 – for a further period of 5 years from the 12th May 2018 to the 11th May 2023.<sup>3</sup>

The LAP sets out a detailed strategy for the lands, the key consideration in relation to this development proposal include:

- Zoning and Objectives
- Vision, Themes and Objectives
- Green Infrastructure
- Transportation and Movement
- Residential Development & Density: including Residential density range, Heights, Urban design.
- Sequencing and Phasing of Development

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<sup>3</sup> <http://meetings.fingal.ie/ieListDocuments.aspx?CId=129&MId=4933>

This Planning Application has regarded these considerations carefully, where the LAP does not provide details or contrasts with other guidelines the Fingal Development Plan is regarded.

### Zoning and Objectives

The lands are zoned Objective RA which has the stated objective to: *Provide for new residential communities in accordance with approved local area plans and subject to the provision of the necessary social and physical infrastructure. This area, known as The Coast, includes the existing residential communities of Myrtle and Red Arches.*

The LAP zoning is consistent with the Development Plan. Given the primary purpose of the subject application is to provide for residential uses the proposed development is clearly consistent with the land-use zoning.

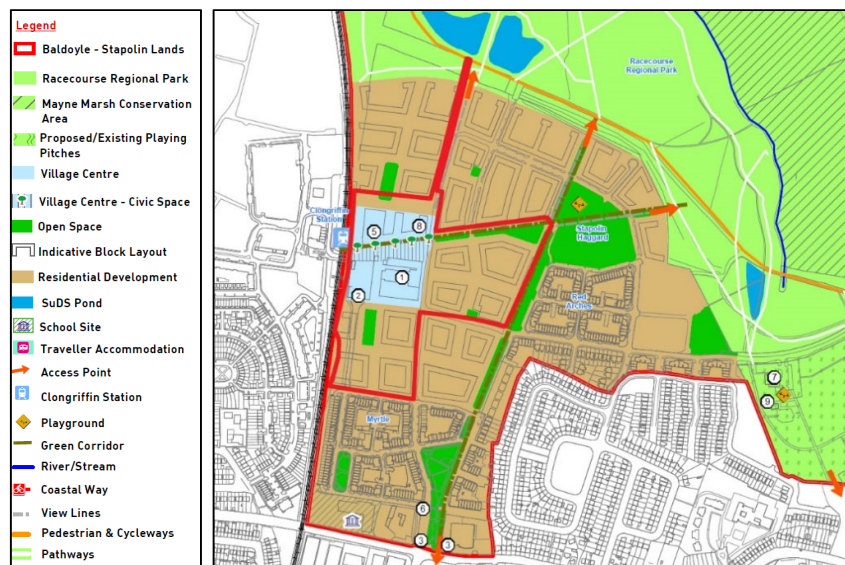


Figure 2.3: Baldoyle Stapolin LAP map. (Source: FCC, 2019.)

The LAP sets out the following objectives for the lands:

#### Map Based Objectives

1. *Facilitate and encourage community facilities which allow for shared and multi-purpose use and adaptability within the village centre, or for non-commercial or small scale community facilities other agreed locations may be considered subject to demand and resources.*
2. *Provide for at least one crèche facility within the village centre area as part of the phasing requirements set out in Section 6 and as required by Section 4E of the Local Area Plan*
3. *Require high quality design and finish to any development at these important gateway nodes to the LAP lands*
4. *Provide for a public park and sensitively designed retirement village subject to screening for assessment under the Habitats Directive as per Local Objective 469 in the 2011-2017 Fingal Development Plan or as may be revised in any future Development Plan*

5. *Ensure that key services such as local and primary health care facilities, public house, and crèche are provided within the village centre to ensure the appropriate mix of community services and facilities, the vitality of the village centre, and to encourage the use of sustainable modes of transport.*
  6. *Facilitate an alternative site readily accessible from Grange Road for a medical/primary care centre, in line with HSE requirements. Such a site should only be considered where it can be demonstrated that a medical/primary care centre cannot be delivered in the village centre within a reasonable timeframe (not to exceed 3 years from date of adoption of this LAP).*
  7. *Facilitate the provision of changing facilities for clubs and teams using the pitches in Racecourse Park and meeting space for community use within this existing building without any undue delay.*
  8. *Facilitate an alternative site to the Grange Road site for an urban type school as part of the village centre's mixed use development on the northern section of the village centre, subject to the requirement for such being indicated by the Department of Education and Skills within the next Capital Programme for Schools (i.e. the successor document to the 2012-2016 Capital Investment Programme for Schools).*
  9. *Provide for a Multi Use Games Area (MUGA) or a small all-weather training facility similar in scale to a MUGA in the vicinity of the changing rooms at the existing active recreational facilities within Racecourse Park subject to screening for Appropriate Assessment.*
- (Our emphasis.)

The proposed development provides for a range of local services to serve the future population, including retail, gym, creche, medical centre, pharmacy in addition to tenant amenity. As such, the facilities in the local centre meet the objectives set out in the above.

In regard to objective No. 8, please see the enclosed Schools Demand and Childcare Facilities Assessment for detail of the assessment carried out in relation to the demand for and existing capacity of nearby schools.

### **Vision, Themes and Objectives**

Section 3 sets out The Vision for Baldoyle-Stapolin which aims: *to create a place to live that is appealing, distinctive and sustainable, with minimal impact on the surrounding environment and the coast. It is envisaged that Baldoyle-Stapolin will develop as a sustainable community comprised of new homes, community, leisure and educational facilities based around an identifiable and accessible new village centre which will form the heart of the area.*

The LAP sets out 3 development themes with corresponding objectives:

1. **Sustainable Development** - *the creation of an urban area with buildings and surrounding areas constructed to high standards of sustainable*



*design, accessible good quality public transport, green spaces and corridors and strong inclusive communities.*

*2. **High Quality Places for All** - the development of interesting, exciting and stimulating buildings and public spaces, which make the most of natural features and are well connected to surrounding areas.*

*3. **A New Heart for Baldoyle-Stapolin**- the development of a new mixed use local centre and public realm in which people want to live, work and invest.*

*4. **Homes for the Future** – the creation of well designed sustainable adaptable homes and neighbourhoods, which cater for a wide range of households.*

The permitted and proposed vision for the subject lands is to create a richly landscaped urban setting with an efficient use of land, promoting sustainable densities. A new 'Urban Hub' providing a mixed-use, connected community in an urban garden with a highly articulated public realm with a broad mix of uses, in a manner that promotes the development of a new vibrant community.

The enclosed documents provide further detail in response to each aspect of the proposed development. In particular HJL architects Design Statement and the BSLA Design Rationale.

#### **Green Infrastructure**

The LAP seeks to create a green infrastructure network of high quality amenity and other green spaces that permeate through the plan lands while incorporating and protecting the natural heritage and biodiversity value of the lands. The LAP sets out a strategy and series of objectives.

As discussed in section throughout this report, Stapolin Square is the focus of the landscape design strategy for the scheme, with the proposed alterations providing for the complete development of Stapolin Square, this central public space provides for informal amenity, public realms, seating and tree planting while the shared residential courtyards provide for amenity and recreation and sense of place. The proposal provides more than c.10,000sqm (1ha) of Public Open Space on site in the form of small parks and pocket parks. This is twice the required provision under FCC Objective DMS57A.

The proposed development also entails a large quantity of semi-private open space in compliance with the relevant standards.

The development benefits from its adjacency to the significant amenity of Racecourse Park, comprising some 112 ha of Class 1 Public Open Space and which includes cycle and walking trails, playspaces and sports pitches.

Please see BSLA Landscape Rationale for further detail in relation to the proposed development.



## Housing Mix

The LAP sets out the following objectives in relation to housing mix:

**Objective RS 1** *Require that a suitable variety and mix of dwelling types and sizes are provided in developments to meet different needs, having regard to demographics, social changes and the human life cycle patterns.*

**Objective RS 2** *Ensure that one bedroom dwellings are kept to a minimum within the development and are provided only to facilitate choice for the homebuyer. In any event, no more than 5% of units in any application or over the whole development, shall be one bedroom units.*

The proposed development provides a wide range of unit sizes and types, catering for a broad section of the population.

We submit that the proposed development, in terms of unit mix, is consistent with the national policy including the Sustainable Urban Housing Design Standards for New Apartments. Please see enclosed Statement of Material Contravention prepared by BSM for full detail and rationale for the contravention in respect of unit mix.

## Density

The LAP sets out a general minimum net density of **35-50 u / ha across the entire site**, subject to appropriate design and amenity standards in the LAP area. Table 4D.1 indicates a density range between the minimum 38 units per hectare and the Preferred Density Masterplan.

Density is a key consideration within this development strategy. The permitted development has a density of 67u/ha and the proposed alterations and increased unit numbers results in a proposed density of 99 u/ha which is considered to be of an appropriate scale and form which responds to existing housing and the emerging development of the area. The LAP states that lower density area dwellings will predominantly consist of semi-detached and terraced houses, while in higher density areas there will be a larger proportion of townhouse, duplex and apartment units.

Objective RS 6 states: *Achieve a residential density in keeping with a compact urban form which reflects the character and function of the locality, having regard to the need to make the most efficient use of land and transport investment.*

The LAP states it is crucial that the LAP: *avoids the characteristics of a large suburban housing estate and instead continues the creation of an urban place, taking its cue from development already completed.*

**Objective RS 6** *Achieve a residential density in keeping with a compact urban form which reflects the character and function of the locality, having regard to the need to make the most efficient use of land and transport investment.*

**Objective RS 7** *Seek to achieve the densities provided for in the Preferred Density Masterplan Figure 4D.1 in order to ensure the population catchment and critical mass necessary to support more services, justify existing and future investment in high quality public transport and community facilities and to generate the conditions for lively streets and open spaces. In any event, a minimum of 38 dwellings per hectare (net density) shall be required in each residential block.*

**Objective RS 8** *Require, generally, a minimum net residential density of 50 units per hectare within the proposed village centre and along the northern boundary with Racecourse Park subject to appropriate design and amenity standards. This will be reflected within the village centre by the provision of between 120 – 190 residential units.*

**Objective RS 9** *Ensure the development of sustainable residential communities through the promotion of innovative, high quality building design and layouts that prioritise non-car based movement and provide for a high level of permeability, accessibility and connectivity to the existing built environment, services and facilities.*

The proposed development meets the above considerations for minimum density. The design strategy exceeds minimum density requirements to justify the existing and future investment in infrastructure and enabling the optimum use of land.

Crucially this density does not compromise the residential amenities of future residents nor existing residential adjacencies. For a more detailed discussion of the proposed density and wider design rationale please see Planning Report and HJL Design Statement.

We submit that the proposed development, in terms of density levels, is consistent with the Fingal Development Plan and national policy including the Urban Development and Building Heights – Guidelines for Planning Authorities. Please see enclosed Statement of Material Contravention prepared by BSM for full detail and rationale for the contravention in respect of density levels within the LAP.

## Heights

The LAP sets out height requirements for the lands in Figure 4D.2. The indicative height across the site corresponds to the density and minimum / maximum heights (by floor) are established for all areas of the LAP lands. A number of punctuation nodes are provided for at key junctions and identified strategic locations. Buildings at these points may be slightly higher than their neighbours (but still within the heights parameters set out above) and/or have specific corner treatment which distinguishes them from other corner locations.

The proposed development includes buildings which range in height from 2 storey houses to 4- 9 storey apartments, with the exception of the landmark building at Stapolin Square which is 15 storeys in height. As a result the proposed development exceeds the provisions of the LAP. The emphasis of the Fingal Development Plan is to continue to consolidate the existing zoned lands and to maximise the efficient use of existing and proposed infrastructure. In this way the Council can ensure an integrated land use and transport strategy in line with national and regional policy.

We submit that the proposed development, in terms of height, is consistent with the Fingal Development Plan and national policy including the Urban Development and Building Heights – Guidelines for Planning Authorities. Please see enclosed Statement of Material Contravention prepared by BSM for full detail and rationale for this contravention.

Please see HJL Design Rationale for further detail in relation to the proposed development.

#### **Phasing and Infrastructure**

The LAP identifies three growth areas to facilitate the phasing of the development. The proposed development is located within GA1.

The LAP sets out the following general consideration for the LAP lands:

- *The first phases of residential development within Growth Area 1 will ensure that linkages are created towards the village centre and the train station in an east-west and north-south direction from existing development at Red Arches and Myrtle.*
- *The second phases of development within Growth Area 2 will occur along the northeastern boundary of the plan lands, linking to the existing development at the east of the lands, through the open space at The Haggard and Stapolin Avenue, to the village centre along Ireland's Eye Avenue.*
- *The third phases of development within Growth Area 3 will provide, in the first instance, for the completion of the village centre through delivery of the northern half of the local centre site. Following, or in tandem with this, the remainder of the residential units will be built out thus completing the site. It will be possible to allow for the parallel development of Growth Areas 2 and 3 provided that the local centre is completed and that residential development in Growth Area 3 progresses from the village centre and Ireland's Eye Avenue northwards.*

In specific relation to GA1 the LAP states:

#### Growth Area 1- Short-Medium term

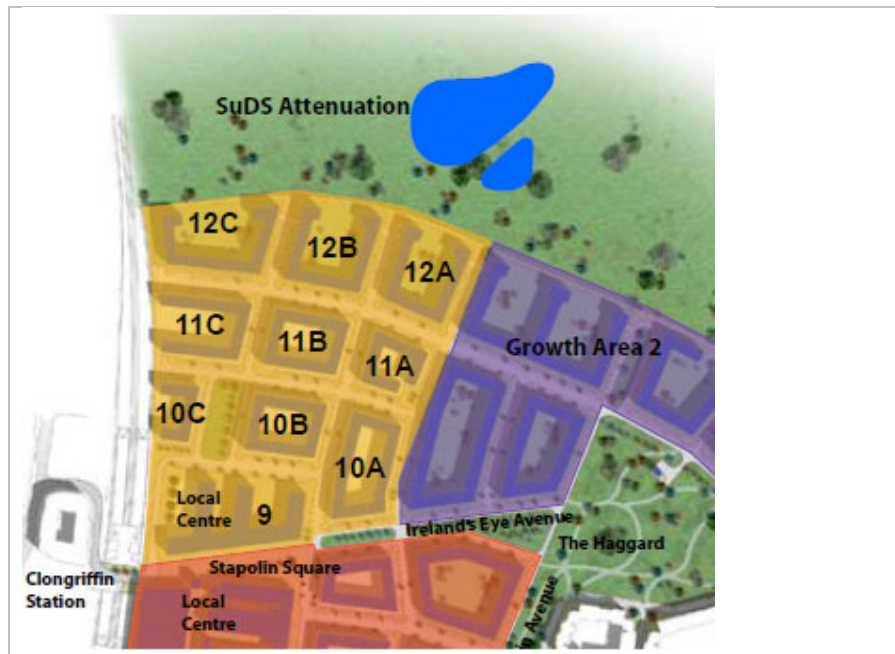
*The southern phases of development, within Growth Area 1, are the short-medium term phases. They will include the southern half of the village centre and will allow for a 'kick start' to the residential development by allowing for densities and typologies which will meet current demand for new residential units. It is envisaged that this timeframe will likely cover the period 2013-2019 and deliver approximately 300 units.*

Figure 6.2 Growth Area 1



#### Growth Area 3 – Medium-Long term

*If not provided earlier, this phase of development will provide for the completion of the village centre to the north of Station Square. Following, or in parallel with, the commencement of construction of the northern half of the village centre the residential sectors will be delivered from the south of the Growth Area northwards ensuring the necessary linkages to existing development. The timeframe for this phase may range from 2018-2025 delivering residential units in the range of 300 to 400+ units.*



### 3 CONCLUSION

The statement set out herein demonstrates the consistency of the proposed application, which seeks to alter a previously permitted development with an increased quantum of development and increased height and density, with the relevant national, regional and local planning policy context.

At a national and regional level, this statement and accompanying submission documentation has demonstrated the consistency of the proposed development with National and Local Planning Guidelines and Policy as outlined in this report.

Consistency with the policies and provisions of the Fingal County Development Plan 2017-2023 and the Ballydoyle-Stapolin LAP 2013 which are the key planning policy documents at a local level, is also demonstrated within this report.

It is respectfully submitted that the proposed development will provide for an increased appropriate form of high quality residential development over and above the permitted development. This Statement of Consistency, accompanying the Planning Application, demonstrates that the scheme as proposed to be altered development is consistent with the national, regional and local planning policy framework, and that the proposal will provide for an effective and efficient use of this highly accessible site.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines and that the proposal as presented and should be permitted by An Bord Pleanála.

