

STRATEGIC HOUSING DEVELOPMENT
PLANNING APPLICATION
**RESPONSE TO AN BORD
PLEANALA OPINION**
FOR ALTERATIONS TO SHORELINE GA01
LANDS AT BALDOYLE, DUBLIN 13

BSM

Est.
1968

**Brady Shipman
Martin**

**Built.
Environment.**

Place
Making
**Built
Environment**

CLIENT

The Shoreline Partnership

DATE

June 2021

Brady Shipman Martin

DUBLIN

Canal House
Canal Road
Dublin 6

+353 1 208 1900

CORK

Penrose Wharf Business Centre
Penrose Wharf
Cork

+353 21 242 5620

LIMERICK

11 The Crescent
Limerick

+353 61 315 127

mail@bradyshipmanmartin.com

www.bradysipmanmartin.com

TABLE OF CONTENTS

1	INTRODUCTION.....	4
2	SPECIFIC INFORMATION REQUESTED BY AN BORD PLEANALA.....	4
2.1	Design Strategy	4
2.2	Materials Strategy.....	6
2.3	Cycle and Pedestrian Connection Details.....	7
2.4	Future and Existing Residential Amenity	7
2.5	Housing Quality Assessment	8
2.6	Transportation Details	9
2.7	Drainage Details.....	9
2.8	School Demand and Concentration Report.....	9
2.9	Additional Design Imagery	10
3	CONCLUSION.....	10

1 INTRODUCTION

Brady Shipman Martin has prepared this Report in Response to the Opinion of An Bord Pleanála of 29th October 2020. This Response has been prepared under Article 285(5) (b) of the Planning and Development (Strategic Housing Development) Regulations 2017 in association with the Applicant and Design Team and also provides the specific information as requested by the Board.

In its Opinion, An Bord Pleanála concluded that having ‘*considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.*’

2 SPECIFIC INFORMATION REQUESTED BY AN BORD PLEANALA

In its Opinion of 29th October 2020 ABP set out 9 No. items of specific information that should be enclosed with the application under Article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017.

2.1 Design Strategy

Item 1 of the ABP Opinion requests:

Further consideration/justification of the documents as they relate to the design strategy for the subject site, as it relates to the height and density of the proposed development. In this regard, the prospective applicant should satisfy themselves that the proposal provides the optimal architectural solution for this site and should submit a rationale/justification for the heights/densities proposed. This consideration and justification should have regard to, inter alia, the minimum densities provided for in the ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ (May 2009) in relation to such sites. Particular regard should be had to need to develop at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage given the location of the site within the Dublin Metropolitan area, its proximity to Clongriffin DART station and to Baldoyle with its established social and community services. The further consideration of this issue may require an amendment to the documents and/or design proposal submitted. Furthermore, the applicant is advised that an appropriate statement in relation to section 8(1)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016, that outlines consistency with the relevant development plan and that specifically addresses any matter that maybe considered to materially contravene the said plan, if applicable, should be submitted.

Response:

As set out in the Planning Report accompanying this application, the subject lands are located immediately adjacent to a high frequency public rail station at Clongriffin (Dart station) providing direct connection into Dublin City and onwards to the wider Dublin Area. Clongriffin is also served by Dublin Bus No. 15. It is also planned that Clongriffin will be served by a future upgraded BusConnects route (Core Bus Corridor Route No. 1¹).

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

As set out in Section 4.5 of the Planning Report accompanying this application, the recently permitted Clongriffin SHD applications, west of the rail line within Dublin City Council area, serve to inform the scale of the proposed development in this part of the wider Clongriffin/ North Fringe / Baldoyle Stapolin area. The proposed development will provide a transition between the existing residential areas to the south and east at the Red Arches, Myrtle and beyond, and the large scale permitted development to the west at Clongriffin. As such the proposal responds to the site's context and scale ensuring no negative impacts on existing or future residents, and critically, responds to Government policy in relation to achieving increased residential density at "central and/or accessible urban locations", and in this case "sites within reasonable walking distance (ie. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or Luas)". See Section 3.8 of the HJL Architects Design Statement for further assessment of this site location condition.

During design development and in response to the An Bord Pleanála Opinion as set out above, the proposed density of the development has been increased from 85 units per hectare to 99 units per hectare since the Pre-Application Consultation with An Bord Pleanála, through a combination of the introduction of an increased number of apartments, omission of duplex units at Blocks B1 and B2 and replacement by apartments, introduction of apartments at Blocks C1a and C2a in place of houses, and in some instances an increase in height to achieve increased density. The increased density has not changed the pattern of development proposed in this application, and is tested against all standards and parameters.

This has increased the overall number of units proposed from 748 no. to 882 no. units, with an increase in apartment numbers to 747 no. apartments (from 597no.) and reduction in house numbers to 135 no. houses (from 151 no.).

This is further set out in the HJL Architectural Design Statement (Section 3) accompanying this application, which sets out the urban design rationale for the

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

current proposed development, and at Section 6, which outlines fully the architectural approach to each of the blocks. The Schedule of Accommodation and Housing Quality Assessment is also set out in the HJL Design Statement at Section 7, Appendix 7.2 and 7.3.

The permitted scheme has a density of c.63 units per hectare and as such this proposed alteration application represents a c.57% increase in density over the permitted development. It is considered that this represents a development more aligned to National Policy since the permitted development was granted in 2017, and specifically aligns with Government policy of: National Planning Framework; Urban Development and Building Heights, Guidelines for Planning Authorities (2018); Sustainable Urban Housing, Design Standards for New Apartments Guidelines for Planning Authorities (2020); and Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009).

As the proposed density and height contravenes the Local Area Plan this is considered in the accompanying Material Contravention Statement which sets out reasoned rationale for An Bord Pleanála to permit the alterations to the permitted development even in the instance of a Material Contravention having taken place.

2.2 Materials Strategy

Item 2 of the ABP Opinion requests:

A Materials Strategy that specifically addresses the proposed materials and finishes for buildings, open spaces, paved areas and boundaries, having regard to the requirement to provide high quality and sustainable finishes and details. This strategy shall include details of the colour, tone and texture of materials and the modelling and profiling of the materials (including any cladding or framework system) on each block. Particular attention is required in the context of the strategic location and visibility of the site and to the long term management and maintenance of the proposed development. A Building Lifecycle report should also be submitted in this regard, which includes an assessment of the long term running and maintenance costs associated with the development in accordance with Section 6.13 of the 2018 Guidelines on Design Standards for New Apartments.

Response:

The proposed building materials are detailed and set out in Section 6.1 Façade Design Principles of the Architectural Design Statement prepared by Henry J Lyons, and further in Section 6 as it pertains to each block. Please see CGIs of the proposed development in Section 7.1 of the Architectural Design Statement which illustrates the quality of the proposed residential units put forward in this application.

A Building Lifecycle Report, prepared by Aramark, is also included as part of the planning application.

2.3 Cycle and Pedestrian Connection Details

Item 3 of the ABP Opinion requests:

Details of cycle and pedestrian connections including legibility and permeability through the development site to the train station and other surrounding areas. The matter of 24 hour accessibility to the train station, given the level differences involved, should also be addressed. Landscaping proposals including an overall landscaping masterplan for the development site. Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including details of play equipment, street furniture including public lighting and boundary treatments should be submitted.

Response:

The accompanying Landscape Design Report prepared by Bernard Seymour Landscape Architects (BSLA), the HJL Architectural Design Statement, and the Transport Impact Assessment prepared by Cronin & Sutton provide a full response to Item 3 as per above.

Stapolin Square forms the central public space to the Baldoyle-Stapolin centre and to this proposed development providing a high quality urban square linking the surrounding areas to the Clongriffin Station and to the wider Clongriffin – Baldoyle area. Its design is set out in detail in the BSLA Landscape Report at Section 5, and at Section 4.5 in the HJL Architectural Design Statement. Further, Cronin Sutton Traffic Impact Assessment Report at Sections 7.4 and 7.5 detail connectivity for pedestrian, cycle, and public transport access to the Clongriffin rail station, and to surrounding areas.

It is considered that the access to the train station on a 24-hour basis is fully facilitated through the design approach, which is designed to be fully inclusive for all abilities, ages, and modes of travel. This is also considered in the Universal Access Statement prepared by OHAC included in this application documentation.

Details of the quantity, type and location of all proposed hard and soft landscaping including details of play equipment, street furniture including public lighting and boundary treatments is set out in the Landscape Design Report and Drawings prepared by Bernard Seymour Landscape Architects.

2.4 Future and Existing Residential Amenity

Item 4 of the ABP Opinion requests:

A report which addresses existing and future residential amenity and which includes matters such as daylight/sunlight analysis, micro-climate/wind impacts and noise impacts, together with proposals to address any such

impacts, if necessary. A daylight/sunlight analysis, showing an acceptable level of residential amenity for future occupiers and neighbours of the proposed development, should include details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties. A month-by-month assessment of average daylight hours within the public open space should be provided within the daylight and sunlight analysis document to allow for a full understanding of the year round level of overshadowing of the primary outdoor recreation areas for the development should be submitted.

Response:

The consideration of matters relevant to residential amenity such as daylight/sunlight analysis, micro-climate/wind impacts and noise impacts are set out in the accompanying Environmental Impact Assessment Report (EIAR). The EIAR concludes that there is no impact to existing adjacent residential properties and their residential amenity and that future residents will have a high quality of residential amenity.

With specific regards to the daylight/sunlight analysis this is also considered in the dedicated report prepared by OCSC and includes a month by month assessment of sunlight hours in public pen spaces. We note An Bord Pleanala's Opinion referenced daylight hours but we submit that as sunlight penetration is the assessment against which open spaces are assessed this is what An Bord Pleanala would be requesting, and is provided accordingly.

2.5 Housing Quality Assessment

Item 5 of the ABP Opinion requests:

A housing quality assessment which provides specific information regarding the proposed apartments and which demonstrates compliance with the various requirements of the 2018 Guidelines on Design Standards for New Apartments, including its specific planning policy requirements. This should also include a schedule of floor areas for all proposed units, clearly setting out the aspect (single, dual, triple) of each unit.

Response:

A Housing Quality Assessment (HQA) has been prepared by Henry J Lyons and accompanies the application (Please see Section 7.3 of the Architectural Design Report). The HQA demonstrates that the proposed development is in compliance with the relevant residential standards.

2.6 Transportation Details

Item 6 of the ABP Opinion requests:

Additional transportation details having regard to the requirements of the Transportation Planning Division as contained within section 8.3.7 Access and Transportation of PA Opinion

Response:

A response to the issues raised by the Transportation Planning Division as contained within section 8.3.7 Access and Transportation of PA Opinion is addressed in Section 8 of the Transport Assessment prepared by Cronin & Sutton Engineers. Additional engagement has taken place since the Pre-Application Consultation meeting with the Transportation Planning Division on these matters.

Further supplementary information is provided at Appendix F of the TIA.

2.7 Drainage Details

Item 7 of the ABP Opinion requests:

Additional drainage details having regard to the requirements of the Drainage Division as indicated in their report contained section 8.3.8 Water Services of PA Opinion. Any surface water management proposals should be considered in tandem with any Flood Risk Assessment, which should in turn accord with the requirements of 'The Planning System and Flood Risk Management' (including associated 'Technical Appendices').

Response:

A Site Specific Flood Risk Assessment, prepared by CS Consulting is included in this planning application, and responds direction to items raised by FCC, at Section 6.0 of this report.

Further, the Engineering Services Report (ESR) and drawings prepared by CS Consulting responds to items raised. Specifically Section 3.5 of the ESR responds on surface water items raised.

Additional engagement has taken place since the Pre-Application Consultation with the Drainage Division on these matters. Fingal County Council Drainage Division confirmed no further comments on the Flood Risk Assessment.

2.8 School Demand and Concentration Report

Item 8 of the ABP Opinion requests:

School Demand and Concentration Report

Response:

A Schools Demand and Childcare Facilities Assessment Report, prepared by BSM, is included in this planning application documentation. It concludes that, in terms of crèche provision, that the proposed crèche, in the provision of c. 135 no. child

places, in addition to crèche provision (both existing and permitted) in the wider area, meets the requirements of delivering this proposed scheme of development.

In terms of school demand, it is concluded that there is sufficient capacity in the area in both existing and permitted school facilities, including on a site immediately to the south of the proposed development, to meet demand arising from this proposed development.

2.9 Additional Design Imagery

Item 9 of the ABP Opinion states

CGIs, visualisations and cross sections, as necessary, which clearly show the relationship between the proposed development and existing development in the immediate and wider area.

Response:

Additional CGIs, visualisations and cross sections have been included in the planning application pack as requested by ABP, with CGIs specifically referenced in Section 7.1 of the HJL Architects Design Statement.

Verified views are prepared by Modelworks and are included within this planning application documentation.

A full drawing pack as prepared by HJL Architects including key cross-sections, forms part of this planning application.

3 CONCLUSION

The Response set out herein outlines that the specific items requested by An Bord Pleanála to be contained within an SHD Application for alterations to permitted development at GA01 Baldoyle, have been both considered and included.

It is respectfully submitted that the proposed development will provide an appropriate form of high quality residential development for this under-utilised site which is highly accessible and well served by public transport.

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 should be permitted by An Bord Pleanála.