

**STRATEGIC HOUSING DEVELOPMENT
PLANNING APPLICATION
PLANNING REPORT
FOR SHORELINE GA03
LANDS AT BALDOYLE-STAPOLIN, DUBLIN 13**

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July 2021

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1 INTRODUCTION

This Planning Report has been prepared in support of a SHD Planning Application to An Bord Pleanála, on behalf of The Shoreline Partnership. The subject application site (hereafter called ‘the site’) is located at Baldoyle-Stapolin, Dublin 13. It is a site of c. 6.89 hectares, and comprises lands referred to as Growth Area 3 (GA3) within the Baldoyle-Stapolin Local Area Plan.

The site lies within a larger landholding, directly to the south of the future Racecourse Park, and to the north of Growth Area 01 (subject of a separate Existing Permitted Development (F16A/0412, ABP Reg. Ref. ABP-248970 (and as amended under F20A/0258 and F21A/0046))) and also a current Strategic Housing Development Application to alter that permitted development (Reg. Ref.: TA06F.310418), which includes the new village centre at Stapolin Square. To the east, the site is bound by an undeveloped area subject of permission F11A/0290 (/E1) and The Haggard Park. The site is bound by the Dublin-Belfast / DART trainline and Clongriffin Station to the west.

The proposed scheme is designed to integrate with and continue both the existing permitted development on the southern GA01 lands (as permitted under FCC Reg. Ref. F16A/0412, ABP Reg. Ref. ABP-248970 and as amended under F20A/0258 and F21A/0046), and the current proposed alterations to the GA01 Lands (currently subject to a separate Strategic Housing Development Application Reg. Ref.: TA06F.310418 for which an overall total of 981 units are either under construction or proposed). The infrastructure and road elements of the F16A/0412, ABP Reg. Ref. ABP-248970 (and as amended under F20A/0258 and F21A/0046) have commenced, along with 99 housing units at Blocks C4, C5 and C6, which will provide for both services and roads connectivity to the GA03 Lands along, and as proposed in this application, an extended Longfield Road.

This application falls under the definition of Strategic Housing Development as set out under Section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016 as it is a proposed development ‘*of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses*’.

The lands, subject of this residential development proposal, are primarily zoned RA ‘new residential’. As such the use of these lands primarily for residential purposes is provided for in the Core Strategy of the Fingal Development Plan 2017-2023 (See Section 5 below for further detail on zoning).

This Planning Report, in addition to a Statement of Consistency with Planning Policy, and Material Contravention Statement, accompanies this Strategic Housing Development Planning Application.

The development for which permission is being sought, as set out in the Statutory Notices, is set out as follows:

The proposed development will consist of the development of 1,221 no. residential apartment/duplex dwellings in 11 no. blocks ranging in height from 2 to 15 storeys and including for residential tenant amenity, restaurant/cafe, crèche, car and bicycle parking and public realm, over a site area of c. 6.89 ha.

1. *The proposed residential development will consist of 1,221 no residential apartment/duplex dwellings (1 no. Studio, 502 No. 1-Bed, 636 No. 2-Bed, 82 No. 3-Bed) set out as follows:*
 - *Blocks E1, ranging in height from 5 to 8 storeys, providing 157 no. apartment units with proposed balconies, and solar panels at roof level.*
 - *Blocks E2, at 5-6 storeys, providing 68 no. apartment units with proposed balconies, and solar panels at roof level.*
 - *Blocks E3, at 6 storeys, providing 45 no. apartment units with proposed balconies, and external roof terrace and solar panels at roof level.*
 - *Blocks E4, at 5 storeys, providing 36 no. apartment units with proposed balconies, and external roof terrace and solar panels at roof level.*
 - *Blocks F1, ranging in height from 2 to 5 storeys providing 91 no. apartment units with proposed balconies, external roof terrace, and solar panels at roof level.*
 - *Blocks F2, ranging in height from 2 to 6 storeys providing 122 no. apartment units with proposed balconies, and solar panels at roof level.*
 - *Blocks G1, ranging in height from 4 to 10 storeys providing 170 no. apartment units with proposed balconies, and solar panels at roof level.*
 - *Blocks G2, ranging in height from 4 to 10 storeys providing 175 no. apartment units with proposed balconies, and solar panels at roof level.*
 - *Blocks G3, ranging in height from 7 to 15 storeys, providing 124 no. apartment units with proposed balconies, and solar panels at roof level.*
 - *Blocks G4, at 7 storeys, providing 60 no. apartment units with proposed balconies, and solar panels at roof level.*
 - *Blocks G5, ranging in height from 4 to 10 storeys providing 173 no. apartment units with proposed balconies, and solar panels at roof level.*

- *Residential Tenant Amenity Facilities of c.2,301.m located in Blocks E3, E4, G3, G4 & G5 and external communal amenity space of c.10,263 sq.m provided at ground, podium and terrace levels throughout the scheme.*
2. *A crèche of c.452 sq.m in addition to outdoor play space of c.123 sq.m. is proposed in the ground floor of Block G4 and 1 no. restaurant/cafe units of c.205 sq.m is proposed on the ground floor of Block E3. Total non-residential uses is c.657 sq.m*
 3. *Car Parking is provided in a mix of undercroft for Blocks E1-E2, F1 and F2 and at basement level for Blocks G1-G3 and G4-G5 with a total parking of 632 spaces for residential units with 33 spaces at surface level for residential use and 8 spaces (4 staff in G4/G5 and 4 drop off) associated with the proposed crèche. 2021 cycle parking spaces are provided for residents and 312 for visitor and commercial uses, in secure locations and within the public realm throughout the scheme.*
 4. *A new central public space between Blocks E1-E2 and E3 and E4 and a new linear space between Blocks G2-G3 and G4-G5 provides pedestrian and cycle connectivity from Longfield Road to the proposed future Racecourse Park to the north is provided.*
 5. *Proposed new bus, cycle, pedestrian and taxi ramp to the south of the site and north of Stapolin Square providing access from Longfield Road to Clongriffin Train Station. Proposed road connections to the site to the south via the extension of Longfield Road and eastward through the regrading of the existing road, providing access to the subject site via these two roads.*
 6. *The development will also provide for all associated ancillary site development infrastructure including: ESB sub-stations, bin stores, plant rooms, public lighting, new watermain connection to the north and foul and surface water drainage; internal roads & footpaths; site landscaping, including boundary treatments; associated scheme signage, and all associated engineering and site works necessary to facilitate the development.*

The proposed scheme is designed to integrate with and continue both the existing permitted development on the southern GA01 lands (as permitted under FCC Reg. Ref. F16A/0412, ABP Reg. Ref. ABP-248970 and as amended under F20A/0258 and F21A/0046), and the current proposed alterations to the GA01 Lands (currently subject to a separate Strategic Housing Development Application Reg. Ref.: TA06F.310418) for which an overall total of 981 units are either under construction or proposed. The infrastructure and road elements of the F16A/0412, ABP Reg. Ref. ABP-248970 (and as amended under F20A/0258 and F21A/0046) have commenced, along with 99 housing units at Blocks C4, C5 and

C6, which will provide for both services and roads connectivity to the GA03 Lands along, and as proposed extended, Longfield Road.

This report examines the site location, context, planning history and sets out clearly the proposed extent and nature of the proposed development. It also has regard to issues of compliance with the Fingal County Development Plan 2017-2023, the Baldoyle-Stapolin Local Area Plan (LAP) 2013 (as extended), and Section 28 Guidelines, which are the relevant statutory documents against which the development will be considered.

This SHD Planning Application is accompanied by a comprehensive set of documentation which specifically seeks to address the requirements of the Planning and Development (Housing) and Residential Tenancies Act 2016, the Planning and Development (Strategic Housing Development) Regulations 2017 and the requirements of the Fingal Development Plan 2017-2023.

An Environmental Impact Assessment Report (EIAR), is submitted to An Bord Pleanala with this SHD Planning Application documentation. The EIAR Report provides information on the likely significant impacts on the environment of the proposed development.

An Appropriate Assessment (AA) Screening Report and a Natura Impact Statement (NIS) prepared by Altemar is submitted to An Bord Pleanala with the SHD Planning Application.

This Planning Report should be read in conjunction with the other documentation (reports and drawings) accompanying this SHD Planning Application including a Material Contravention Statement, set out in the schedule included in the Cover Letter to An Bord Pleanala.

We confirm that prior to making this SHD Planning Application to An Bord Pleanala, that the drawings enclosed herewith have been checked with reference to the Planning and Development Regulations, 2001-2021.

2 Material Contravention

This Strategic Housing Development Application includes a Material Contravention Statement which seeks to address the issue of material contraventions of the Fingal County Development Plan 2017-2023 (Development Plan), and the Baldoyle-Stapolin Local Area Plan 2013 (Local Area Plan), as extended, as required under Section 8 of the Planning and Development (Housing) and Residential Tenancies Act 2016. This Statement provides a rationale for An Bord Pleanala, as the consenting authority, to conclude that

there is justification for material contravention in relation to Section 12.10 of the Development Plan and Sections 4D.2 and 4D.4 of the Local Area Plan.

Section 9 (6) of the Planning and Development (Housing) and Residential Tenancies Act, 2016 confirms that An Bord Pleanála may grant permission for a development which materially contravenes a Development Plan, other than in relation to the zoning of land having regard to the considerations specified in section 37(2)(b) of the Act of 2000.

The Material Contravention Statement provides a justification for the material contraventions of the above referenced statutory planning documents, in relation to the Local Area Plan: (i) building height, (ii) density (iii) unit mix.; and in relation to the Development Plan, (iv) Core Strategy and (v) parking provision:

(i) Building Height

- Section 4D.4 of the Local Area Plan identifies building heights for the Local Area Plan (LAP) lands and identifies building heights in the range of 2-5 storeys with ‘punctuation nodes’ for development in this location. The *Urban Development and Building Heights – Guidelines for Planning Authorities* (December 2018) establish the principle for the re-examination of height limits and should be considered over the Local Area Plan height limits on a site specific contextual basis.

(ii) Density

- Section 4D.2 of the Local Area Plan sets out a general minimum net density of 42-80+ units / ha across the entire site of the Local Area Plan. The *Sustainable Urban Housing, Design Standards for New Apartments* (2020) establish the principle for the re-examination of density and should be considered over the Local Area Plan densities on a site specific contextual basis. While it is not considered that a Material Contravention of this section has occurred it is set out for consideration by An Bord Pleanála.

(iii) Unit Mix

- Objective RS 2 of the Baldoyle- Stapolin LAP 2013 states that ‘*no more than 5% of units in any application or over the whole development, shall be one bedroom units*’. *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities*’ (December 2020) contains SPPRs in relation to dwelling mix requirements, SPPR 1 which post-dates the Local Area Plan and should be considered in the context of any conflicting policies and objectives of Development Plan or Local Area Plans.

(iv) Core Strategy

- Chapter 2 of the Fingal Development Plan 2017- 2023, as varied by Variation No.2 sets out the Core Strategy and Settlement Strategy for County Fingal. Table 2.2 sets out the Remaining Capacity Residential Units for Baldoyle which, if permitted, this Development would exceed.

(v) Parking Provision

- Section 12.10 of the Development Plan identifies parking standards for residential development. The *Sustainable Urban Housing, Design Standards for New Apartments* (2020) establish the principle for the re-examination of car parking provision and should be considered over the Development Plan parking standards on a site specific contextual basis.

It is considered, as is set out in the accompanying Material Contravention Statement and the supporting planning application documentation, including this Planning Report, that sufficient justification exists for An Bord Pleanála to grant permission for the proposed development notwithstanding the proposed material contraventions of the Local Area Plan in relation to height, density and unit mix, and the proposed material contravention of the Fingal County Development Plan in relation to parking provision and core strategy, having regard to the considerations specified in section 37(2)(b) of the Act of 2000.

3 SITE LOCATION AND CONTEXT

3.1 Subject Site

The subject lands are primarily undeveloped in nature, with the exception of a network of access roads traversing the lands.

The site lies within a larger landholding, directly to the south of the future Racecourse Park, and to the north of Growth Area 01 (subject of a separate Existing Permitted Development FCC Reg. Ref. F16A/0412, ABP Reg. Ref. ABP-248970 and as amended under F20A/0258 and F21A/0046) and also a current Strategic Housing Development Application to alter that permitted development Reg. Ref.: TA06F.310418), which includes the new village centre at Stapolin Square. To the east, the site is bound by an undeveloped area subject of permission F11A/0290 (/E1) and The Haggard Park. The site is bound by the Dublin-Belfast / DART trainline and Clongriffin Station to the west. The future Baldoye Racecourse Park is located to the north of the site. The Baldoye Estuary is further east beyond the R106 Coast Road.

3.2 Context

The subject site is located in Baldoye, Dublin 13 approximately 10km north east of the city centre. The site is on the edge of the urban extent of Dublin City. It is within the administrative area of Fingal County Council adjacent to the Dublin City Council administrative boundary at Clongriffin to the west.



Figure 2.1: Subject site in the urban context (Source: Google Maps, 2020).

Surrounding uses to the west, south and east are predominately residential in nature. To the north and north east, is an area designated as 'high amenity'

comprising partially of agricultural fields and areas associated with the Baldoyle Estuary. It is intended that Fingal County Council will deliver 'Baldoyle Racecourse' Regional Park as part of the Development Plan and Local Area Plan objectives at this location.

4 PLANNING HISTORY

There has been relatively little planning activity on the subject lands in recent years. We note 1 no. significant planning application adjacent the subject site, with a current Strategic Housing Development Application seeking to alter that permission, in addition to 1 no. previously permitted application to the east of the subject lands.

However, the wider Clongriffin area, to the west of the rail line, has had a significant amount of planning activity. Notably this includes 2 No. large scale recently permitted SHDs to the west of the subject site within the administrative area of Dublin City Council.

4.1 ABP Reg. Ref. TA06F.310418 (Current Application)

A Strategic Housing Development Application seeking permission for alterations to previously permitted development on the GA01 Lands as per Fingal County Council Reg. Ref.: F16A/0412 (An Bord Pleanála Ref: 248970) as amended by Reg. Ref. F20A/0258 and F21A/0046, was submitted to An Bord Pleanála on the 4th June 2021.

This permission seeks the alteration of permitted development, as permitted under FCC Reg. Ref. F16A/0412, ABP Reg. Ref. ABP- 248970 (and as amended under F20A/0258 and F21A/0046), for the development of 544 no. residential units (385 no. apartments and 159 no. houses) retail and a crèche (99 no. units of which in Blocks C4, C5 and C6 (previously indicated as D1) are under construction) with development now proposed for 882 no. residential dwellings (747 apartments, 135 houses) in 15 no. blocks ranging in height from 2 to 15 storeys and including for residential tenant amenity, retail/café/restaurant, pharmacy, medical centre, crèche, gym, car and bicycle parking and public realm, over a site area of approx. 9.1 ha, of which the development area is 8.89 ha. The proposed alterations result in an overall increase of 437 no. units and a total permitted development of 981 units under F16A/0412, ABP Reg. Ref. ABP-248970 as amended. The proposed development relates to the alteration of development previously permitted at Blocks A1, A2, A3, B1, B2, B3, B4, C1, C2 & C3 and new proposed Blocks D1, D2 & D3 to the north of Stapolin Square.

The proposed alterations do not apply to blocks C4, C5 and C6 (previously indicated as D1) of the permitted development, which relates to 99 no. houses

which are currently under construction or the permitted The Haggard Park which remains as permitted, or all other elements including Surface water attenuation wetlands and associated upstream surface water network, demolition of existing temporary lift and stair enclosure and associated infrastructure to Clongriffin Train Station, Road infrastructure (except where within the application boundary and requiring to be locally altered for proposed development), and Utilities infrastructure (except where within the application boundary and requiring to be locally altered for proposed development), all of which remain as per permitted.

4.2 FCC Reg. Ref. F16A/0412 (ABP Ref. 248970) (and subsequently as amended under F20A/0258 and F21A/0046 – set out further at Sections 3.3 and 3.4 below).

FCC Reg. Ref. F16A/0412 (ABP Ref. 248970) permits approximately 546 no. residential units (385 no. apartments and 161 no. houses) and a village centre comprising c. 1,917 sq.m of commercial floor space that includes shops, a café and a crèche.

As part of this permitted development, pedestrian access to the train station is provided across a plaza known as Stapolin Square with steps and ramps to address the difference in levels, with the existing access to the station to be closed. A new open space of c.1.5ha is permitted at The Haggard to the north east of the main part of the site.

The permission was granted on appeal July 7th, 2017 and has a 10 year duration. The permitted density is 63 u/ha.

Density

In a number of areas the permitted development provided a density which was in excess of that set out in the Baldoyle-Stapolin LAP. The LAP sought development at Blocks B, C and D in the permitted development at a density of 38-42 and the permitted Blocks B,C & D of The permitted development provided 351 units, at a density of 47 units per hectare. At Block A the permitted development provided another 195 units at a density of 108 units per hectare within zone C of the LAP, where densities of over 80 units per hectare are sought. (Ref: Baldoyle-Stapolin Local Area Plan Fig. 4D.1 Preferred Density Plan).

In this regard the Inspector observed that *“Those blocks would be less than 3 minutes’ walk from the railway station, so the provision of a greater density of accommodation so close to a public transport corridor is justified with reference to the guidance at section 5.8 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas.”*

As such this rationale for higher density is consistent with wider decision making and comparable with the proposed scheme.

4.3 FCC Reg. Ref. F20A/0258

A final grant of permission was issued by Fingal County Council on 3rd September 2020 for minor alterations to the permitted residential development, as permitted under F16A/0412, ABP Re. Ref; PL06F.248970. The proposed alterations related to Blocks C4, C5 and C6 (previously D1) only and primarily related to the alteration of external finishes and material of permitted housing. The units subject of this permission are currently under construction.

4.4 FCC Reg. Ref. F21A/0046

A grant of permission was issued by Fingal County Council on 27th April 2021 for proposed alterations to Blocks B3, B4, C3, C4, and C5 only and related to either:

- Proposed alterations to some of the permitted Unit Types in respect of their external design which relates primarily to roof and porch design as well as external finishes, minor internal reconfiguration and removal or alteration of permitted solar panels.
- The introduction of new Unit Types in place of permitted units.
- Reduction of overall units by 5.

This was granted by FCC with a condition to exclude the proposed alteration of Unit Types and layout of Block C3 “in the interest of visual and residential amenity”. As a result of this permission the parent permission (FA16/0412, as amended) permits the development of 544 total units (a reduction in 2 no. units).

4.5 FCC Reg. Ref. F11A/0290 (/E1), PL06F.239732

Regents Park Development Ltd. were granted permission on appeal on 11th April 2013 and given a further extension of duration of permission in 2018 (FCC Reg. Ref. F11A/0290/E1) on lands at Growth Area 2 ('GA02'), as per Baldoyle-Stapolin Local Area Plan. FCC initially refused the application however An Bord Pleanala subsequently granted permission following appeal. The development entailed 400 no. dwelling units, 3 no. retail units, a crèche, surface and basement level car parking, landscaping and all associated works.

4.6 Clongriffin SHD Applications (Dublin City Council Area adjacent)

An Bord Pleanala (ABP) granted 2 No. SHD applications west of the DART line in Dublin City Council area, under SHD Reg. Ref 305316 and SHD Reg. Ref. 305319 on the 18th December 2019. Both applications were prepared together and were considered concurrently and have very similar assessments:

- **Clongriffin SHD 1 Reg. Ref 305316:** 916 no. apartments including the loss of 114 units (238 no. residential, 678 no. Build to Rent units), 2 no. crèches, 10 no. retail units and all associated site works. Primarily consisting of 6-7 storeys in height but also include 17 storeys at Block 17 and 15 storeys at Block 26.

- **Clongriffin SHD 2 Reg. Ref. 305319:** 500 no. apartments (235 no. residential, 265 no. build to rent), crèche and all associated site works in block of 2 – 8 storeys in height.

Height

Blocks 17 and 26, of Clongriffin SHD 1 Reg. Ref 305316, are higher than the other buildings. The LAP identifies Block 17 as a location where a higher building is desirable, although it specifies heights of between 10 and 14 storeys. Precedent for a higher building at this location was set under ABP 248713, Reg. Ref. 3634/16 which permitted a 16 storey building with 139 apartments on this block.

In relation to Block 26, which stands at the edge of the North Fringe area beside the railway line, Mayne River and the greenbelt to the north, the Inspector states: *Its suitability for a taller building is established by its situation position beside those open lands and at the intersection of two local routes through the North Fringe: Marrsfield Avenue and Station Street. The design submitted in the current proposal for a 15 storey building there is of a sufficient quality for its prominence. It would improve the legibility of the area and establish a clear boundary with the rural lands beyond.*

The Inspector considered the proposed maximum heights (17 storeys at Block 17 and 15 storeys at Block 26) as acceptable despite contravening Section 16.7.2 of the Dublin City Development Plan and objective UD07 of the Clongriffin-Belmayne Local Area Plan 2012-2018 (extended to 2023).

Further he notes the taller buildings *'would also improve the overall density of residential development in a district centre on a public transport corridor. Any contravention of the development or local area plan would therefore be justified by the guidelines on building height issued in 2018, in particular SPPR 1 and 3.'*

In summary, the Inspector stated that the contravention of the above referenced policy was justified *because of the positive contribution that the higher buildings would make to the development at a sustainable density in a district centre on a public transport corridor and to standard of urban design that would be achieved for this emerging part of the city.*

Density

The proposed density of approx. 163 units/ha for SHD 1 and 200 units/ha for SHD 2 was considered appropriate given the proximity of the site to a railway station, QBC and a new town centre. The density of the proposed development would therefore be in line with the National Planning Framework.

The Inspector stated: *The density of the development proposed in this application is 163 dph, while that of the three concurrent applications is 171 dph. This would*

bring the overall density at Clongriffin to 84 dph, which is appropriate for an area with a railway station and a new town centre.

In relation to both applications, DCC in turn stated: *The density of the proposed development would be in line with the advice in the National Planning Framework having regard to the site's proximity to a railway station and a Quality Bus Corridor.*

Car Parking Provision

The permitted car parking rate was 0.48 (673 no.) per dwelling and 0.52 (357 no.) per dwelling in SHD 1 and SHD 2, respectively. This was considered acceptable given the accessibility of the area. The stated rate was higher however the Inspector discounted the visitor spaces in his calculation. The Applicant submitted that this would mitigate the impact that the occupation of the proposed development would be likely to have on the demand for transport by private car on the road network in the area.

5 PRE-PLANNING CONSULTATION

Both the context and approach to the application site and the emerging design rationale for the proposed development, have been subject to considerable consultation with the Fingal County Council Planning Department under Section 247.

A series of meetings have been held with the Council's Planning Department as formal pre-application discussions on the substance of the proposed development. The attendees and dates of these meetings were:

- 17 Dec 2019- FCC Kathy Tuck / Sean Walsh (Planning), Linda Lally (Transport), Mark Finnegan (Parks), Damien Cox (Water)
- 29 Jan 2020- FCC Kathy Tuck / Sean Walsh (Planning), Niall Thornton (Transport)
- 16 April 2020 – FCC Kathy Tuck / Sean Walsh (Planning), Niall Thornton (Transport), Mark Finnegan (Parks)
- 17 September 2020 – FCC Kathy Tuck / Sean Walsh (Planning), Niall Thornton (Transport), Mark Finnegan (Parks), Damien Cox (Water)

In addition a Tri-Partite Meeting was held with Fingal County Council and An Bord Pleanala on 4th February 2021.

6 PLANNING FRAMEWORK

6.1 Fingal Development Plan 2017-2023

The proposed development is located in the administrative area of Fingal County Council and subject to the Fingal Development Plan 2017-2023, and the Baldoyle-Stapolin LAP 2013 (as extended). This section discusses the specific provisions of the Development Plan in relation to development management standards. Please see Statement of Consistency enclosed with this application for wider discussion of the Core Strategy and other general policy considerations.

Core Strategy

Chapter 2 of the Development Plan sets out the Core Strategy and Settlement Strategy for 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 No 2¹ to the Fingal Development Plan. This Variation was approved by FCC Councillors in June 2020. This Variation has not fundamentally changed the Baldoyle policy context.

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 2.8, 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

The emphasis of the 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.

¹ <https://www.fingal.ie/sites/default/files/2020-07/adopted-variation-2.pdf>

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 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 (new residential zone straddling Dublin City Council and Fingal County Council areas, at the northern edge of Dublin City).

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.*

As set out in the Development Plan the Remaining Capacity Residential Units for Baldoyle for the period 2017-2023 is 1,498 units. Considering the permitted F16A/0412 (as amended under F20A/0258 and F21A/0046) for 544 no. residential units in GA01 (part of which has commenced – 99 no. units) and the extant but not yet built permission under F11A/0290 (/E1) for c.400 no. units at GA2 were permitted under the previous Development Plan these are not counted in respect of the Remaining Capacity Residential Units.

It is considered that the combination of the current proposed alterations to the permitted development at GA01 (F16A/0412, as amended under F20A/0258 and F21A/0046) under a current SHD application resulting in a total of 981 units (an increase of **437 no.** units) the proposed units on GA03 for **1,221 no.** units (this application), will exceed the total of 1,498 units set out in the Core Strategy by 160 units. This is further set out in the Material Contravention Statement accompanying this Planning Application.

Zoning

The subject site is primarily 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.*

The subject site is also partially zoned HA 'high amenity', the objective of which is to 'Protect and enhance high amenity areas'. No residential or ancillary residential development is proposed in this area, this land is solely included to allow for services connections as required by Irish Water. It is considered that the element being provided is related to drainage infrastructure in the form of below ground pipes connecting the development to existing infrastructure.

Further detail provided by the Development Plan states: *Protect these highly sensitive and scenic locations from inappropriate development and reinforce their character, distinctiveness and sense of place. In recognition of the amenity potential of these areas opportunities to increase public access will be explored.*



Figure 5.1: extract from the Fingal Development Plan Zoning Map 10 (Source: FCC, 2020).

Development Management Standards

Chapter 12 of the Fingal Development Plan sets out development management standards for development proposals.

Design Criteria for Urban Development

The Development Plan sets out the following requirements for large scale residential developments:

High Quality Urban Design

Objective DMS03 states: *Submit a detailed design statement for developments in excess of 5 residential units or 300 sq m of retail / commercial / office development in urban areas. The design statement is required to:*

- *Explain the design principles and design concept.*
- *Demonstrate how the twelve urban design criteria (as per the 'Urban Design Manual - A Best Practice Guide') have been taken into account when designing schemes in urban areas.*
- *Each of the twelve criteria is of equal importance and has to be considered in an integrated manner.*
- *Outline how the development meets the Development Plan Objectives, and the objectives of any Local Area Plan, Masterplan, Urban Centre Strategy, Framework Plan or other similar Plan affecting the site.*
- *Include photographs of the site and its surroundings.*
- *Include other illustrations such as photomontages, perspectives, sketches.*
- *Outline detailed proposals for open space and ensure the provision of open space is designed in from the beginning when designing a new scheme.*
- *Outline a detailed high quality open space and landscape design plan including specifications, prepared by suitably qualified professionals.*
- *Outline how Green Infrastructure integrates into the scheme.*

Green Roofs and Walls

- **Objective DMS16:** *Promote and encourage the use of green walls and roofs for new developments that demonstrate benefits in terms of SuDS as part of an integrated approach to green infrastructure provision.*
- **Objective DMS17:** *Promote and encourage the use of green walls and roofs as part of an integrated approach to green infrastructure provision.*

Design Criteria for Residential Development

Section 12.4 sets out design criteria for Residential Development. The Development Plan draws attention to the following areas, which have been carefully considered by the design team, in particular:

- **Residential Zoning:** the subject lands are appropriately zoned for the proposed development and will in turn create a new high quality residential environment.

- **Mix of Dwelling Types:** the development will provide a sustainable mix of unit types and sizes enabling a choice of housing for a broad section of the population.
- **Residential Density:** the proposed density has been carefully considered in the context of the emerging urban area, the presence of key public transport facilities and in reference to guidelines including: *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009)*, *the Sustainable Urban Housing Design Standards for New Apartments (2020)* and *the Urban Development and Building Heights Guidelines for Planning Authorities (2018)*.

Apartment Development

Apartment design standards set out in individual Development Plans, and in this case Fingal County Development Plan, have now been superseded by the *Sustainable Urban Housing Design Standards for New Apartments (2020)*. In many cases these requirements overlap:

- **Objective DMS20** *Require the provision of a minimum of 50% of apartments in any apartment scheme are dual aspect.*
- **Objective DMS21** *Allow a reduced percentage of dual aspect apartments only in circumstances where it is necessary to ensure good street frontage and subject to high quality design. In no instance will the provision be less than 33% of the number of apartments in the scheme.*
- **Objective DMS22** *Require a minimum floor to ceiling height of 2.7 metres in apartment units, at ground floor level.*
- **Objective DMS23** *Permit up to 8 apartments per floor per individual stair/lift core within apartment schemes.*

Quantitative Standards

The Development Plan sets out a range of quantitative standards for residential units in order to achieve a high standard of accommodation for future residents. The following general standards apply:

- **Objective DMS24:** *Require that new residential units comply with or exceed the minimum standards as set out in Tables 12.1, 12.2 and 12.3.*
- **Objective DMS25:** *Require that the majority of all apartments in a proposed scheme of 100 or more apartments must exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10%.*
- **Objective DMS26:** *For apartment schemes between 10 and 99 units, require that the majority of all apartments in a proposed scheme must exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10%. This may be redistributed throughout the scheme, i.e. to all proposed units.*

- **Objective DMS27:** *Require that all planning applications for residential development include floor plans for each room indicating typical furniture layouts and door swings.*

The proposed development meets or exceeds the above standards. Please see HJL's drawings and Housing Quality Audit for detail in relation to compliance with the above.

Other Residential Development Standards

The Development Plan sets out a range of standards in relation to residential developments including: separation distance, daylight and sunlight, acoustic design, communal facilities and refuse facilities.

Separation Distances

The proposed development meets these relevant standards as set out below. Please see documentation prepared by HJL including Design Rationale and Schedule of Accommodation for further details of these standards.

Objective DMS28	<i>A separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall generally be observed unless alternative provision has been designed to ensure privacy. In residential developments over 3 storeys, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs.</i>
Objective DMS29	<i>Ensure a separation distance of at least 2.3 metres is provided between the side walls of detached, semi-detached and end of terrace units.</i>
Objective DMS31	<i>Require that sound transmission levels in semi-detached, terraced, apartments and duplex units comply as a minimum with the 2014 Building Regulations Technical Guidance Document Part E or any updated standards and evidence will need to be provided by a qualified sound engineer that these levels have been met.</i>

Daylight, Sunlight and Overshadowing

The proposed development is considered in relation to Daylight and Sunlight. Please see Daylight Sunlight Report prepared by OCSC for further details of same.

Objective DMS30	<i>Ensure all new residential units comply with the recommendations of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (B.R.209, 2011) and B.S. 8206 Lighting for Buildings, Part 2 2008: Code of Practice for Daylighting or other updated relevant documents.</i>
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Management Companies and Facilities for Apartment Developments

The proposed development meets the relevant standards in relation to management facilities. Please see Estate Management Plan prepared by Aramark for further details of same.

Objective DMS33	<i>Require properly constituted management companies in apartment type schemes are set up and necessary management structures are put in place for the benefit of the residents.</i>
Objective DMS34	<i>Provide in high density apartment type schemes in excess of 100 units facilities for the communal use of residents as deemed appropriate by the Council.</i>

Refuse Storage and Bins

The proposed development meets the relevant standards in relation to Refuse Storage and Bins. Please see Operational Waste Management Plan prepared by AWN; and HJL Design Rationale and Schedule of Accommodation for further details of refuse facilities.

Objective DMS35	<i>Require the provision of communal laundry rooms and storage facilities in high density apartment type developments where deemed appropriate.</i>
Objective DMS36	<i>Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequate screened alcoves or other such mitigation measures are provided.</i>
Objective DMS37	<i>Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres.</i>

Public Open Space

The provision of open space in the proposed development has been carefully considered. Section 12.7 of the Development Plan sets out Fingal’s approach to open space in developments.

FCC has five basic principles of open space provision: *Hierarchy, Accessibility, Quantity, Quality and Private Open Space*. In this regard the Balydoyle-Stapolin LAP sets out an open space hierarchy for the subject lands. Please see Section 2.2.2 in regard to Open Space proposals.

Please see BSLA's Landscape Strategy in regard to landscape proposals for private and public open space, set out in the HJL Design Statement, and in the BSLA Landscape Design Report.

It is considered that the transition to the adjacent High Amenity Lands will be the subject to a future S.34 Planning Application to incorporate this transition space into the wider development context, and in particular to respond to the future Racecourse Park.

FCC state that public open space provisions should exceed 10% of a development site area. The proposed development meets FCC open space requirements, as set out below:

Objective DMS56	<i>Integrate and provide links through adjoining open spaces to create permeable and accessible areas, subject to Screening for Appropriate Assessment and consultation, including the public, as necessary.</i>
Objective DMS57	<i>Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.</i>
Objective DMS57A	<i>Require a minimum 10% of a proposed development site area be designated for use as public open space.</i>

Private Open Space for Apartments

FCC require all residential units to be provided with private open space. Open space standards set out qualitative and quantitative standards so as to ensure that the maximum benefit is derived from the open space. The quantitative standards set out in the Development Plan for apartments are superseded by the previously referenced *Sustainable Urban Housing, Design Standards for New Apartments* (2020).

The proposed development entails both private and semi-private open space.

The HJL Housing Quality Assessment provides details in relation to the provision of this semi-private and private open space.

Childcare Facilities

The proposed development notes the provisions in the Development Plan in regard to Childcare Facilities. Please see BSM Schools Demand and Childcare

Facilities Assessment Report which details the rationale for the provision of childcare facilities.

The purpose of this Report is to assess the provision and need of childcare facilities in the area and to provide justification for the childcare facilities proposed.

The proposed crèche is of a high quality design and as such complies with the following objectives:

Objective PM74	<i>Encourage the provision of childcare facilities in appropriate locations, including residential areas, town and local centres, areas of employment and areas close to public transport nodes.</i>
Objective PM75	<i>Ensure that childcare facilities are accommodated in appropriate premises, suitably located and with sufficient open space in accordance with the Childcare (Pre-School Services) (No. 2) Regulations 2006.</i>
Objective PM76	<i>Require as part of planning applications for new residential and commercial developments that provision be made for appropriate purpose built childcare facilities where such facilities are deemed necessary by the Planning Authority.</i>

6.2 Baldoyle- Stapolin Local Area Plan (LAP) 2013 (Extended)

Adopted in May 2013 by FCC, the County Council Members, having considered the Chief Executive’s Report at a Council meeting on the 12th March 2018, decided to approve the extension of the life of the Baldoyle-Stapolin LAP 2013-2019 – for a further period of 5 years from the 12th May 2018 to the 11th May 2023.²

The LAP sets out a detailed strategy for the lands. The key considerations 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

² <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 considered.

Zoning and Objectives

The lands are primarily 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 Subject site is also partially zoned HA ‘high amenity’, the objective of which is to ‘Protect and enhance high amenity areas’. No residential or ancillary residential development is proposed in this area, this land is included to allow for services connections as required by Irish Water. It is considered that the element being provided is related to drainage infrastructure in the form of below ground pipes connecting the development to existing infrastructure.



Figure 5.2: Baldoye Stapolin LAP map. (Source: FCC, 2020.)

The LAP sets out the following objectives, with those most relevant in bold (our emphasis), for the subject 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.*

The development includes for an increased range of local services providing for a restaurant/café unit and crèche which are provided as complementary to the local centre as proposed to be provided under the current alteration application for the GA01 Lands. The GA01 Lands, as currently proposed, includes for retail, cafe, gym, crèche, medical centre, pharmacy which is considered will provide for an appropriate mix of community services and facilities, ensuring the vitality of

the village centre. While the LAP references a ‘public-house’ as a possible use it is submitted that the cafe/restaurant uses provide for a more appropriate form of development. As such, the facilities in the proposed Local Centre at Stapolin Square meet the objectives set out in the above to serve both GA01 and GA03 Lands.

In regard to objective No. 8, please see the enclosed Schools Demand & Childcare Facilities Assessment Report for details of the assessment carried out in relation to the demand for and existing capacity of nearby schools. It is noted that to the south of the LAP lands, an objective exists to provide a ‘proposed school’ at Grange Road. This designation corresponds with a recently permitted development under FCC Reg. Ref. F19A/0461 for a 16 classroom primary school at Myrtle Road, Baldoyle. It is also set out that two alternative sites are identified for future need in the LAP, one along Grange Road and the other in the village centre, and states ‘*only one of these sites will be required*’. As the site at Grange Road has proceeded to permission for a school, then this site within the village centre is not deemed to be required.

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 4 interlinked thematic 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 enclosed documents provide further detail in response to each aspect of the proposed development, in particular HJL Architects Design Statement.

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.

The BSLA Landscape strategy is incorporated into the HJL Design Report, and sets out the public and private open space provision and the design intent of high quality public realm provision.

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 unit mix proposed as part of this application is as follows:

- Studios 0.1 %
- 1 beds 41.1%
- 2 beds 52.1%
- 3 beds 6.7 %

We note however that ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’ (December 2020) contains a “Specific Planning Policy Requirement” in relation to dwelling mix requirements, SPPR 1 , which post-dates the Local Area Plan and should be considered in the context of any conflicting policies and objectives of Development Plans or Local Area Plans.

SPPR 1 of the Apartment Guidelines (2020), states as follows:

‘Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city

or metropolitan area basis and incorporated into the relevant development plan(s)';

As such, given the proposed alteration application is subject to the provisions of the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (December 2020) the scheme is compliant with SPPR 1 with post-dates the Local Area Plan and as such the inclusion of 41.31% studio and 1 beds as part of the overall scheme mix is considered to be acceptable. Please see Section 5.3 of this Report for summary overview of residential provision, and the accompany HJL Architects Design Statement. This is also considered in the accompanying Material Contravention Statement.

Density

With regards to density, the LAP sets out a general density of **42-80+ units / ha across the entire site**, subject to appropriate design and amenity standards in the LAP area. A Preferred Density strategy is set out in Figure 4D.1 of the LAP where density varies between medium and higher density, within a range of 42-80+ units/hectare.



Figure 2.3: Baldoyle Stapolin LAP Preferred Density Masterplan Fig. 4D.1
(Source: FCC, 2020.)

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 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.*

Density is a key consideration within this development strategy. The proposed density of 177 u/ha based on the site developable area of residentially zoned lands of c 6.89 ha is of an appropriate scale and form which responds to existing housing and the emerging development of the area. The design strategy exceeds minimum density requirements to justify the existing and future investment in infrastructure and enabling the optimum use of land, and responding to Government Guidelines in relation to sustainable residential density.

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 Section 6.0 of this Planning Report and HJL Design Statement as well as consideration in the Material Contravention Statement.

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.

Please see Section 6.2 below for further detail in relation to the proposed height strategy, and the HJL Design Statement.

Phasing and Infrastructure

The LAP identifies three growth areas to facilitate the phasing of the development. The proposed development is located within Growth Area 3 (GA3). It incorporates the entirety of GA3 with the exception of the Local Centre which is proposed to be delivered in its entirety under the proposed alterations to the GA1 Application, currently with An Bord Pleanala. This application for development overlaps somewhat with the GA1 application in the proposed delivery of the bus / vehicular ramp access to Clongriffin Station running north of the Local Centre.

Figure 6.1 Growth Areas within the LAP Lands



Figure 2.4: Baldoye Stapolin LAP Growth Areas within the LAP Lands Fig. 6.1 (Source: FCC, 2020.)

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.*

Growth Area 2 is subject of an extant permission for development (FCC Reg. Ref. F11A/0290/E1) and is currently subject to a Strategic Housing Development Pre-Application Consultation Request for c.1007 units. Notwithstanding its non-delivery to date, it is considered that Growth Area 3 can proceed to planning and development, given that Growth Area 1 is currently under construction, with a further intent to amend that permission to deliver higher density residential development, and complete the Village Centre, centred on Stapolin Square, in that phase of development. This then allows GA3 to continue to develop northwards from the Village Centre, as set out in the LAP.

In specific relation to GA3 the LAP states:

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.

Phasing for this proposed development is in accordance with the LAP reflecting delivery northwards of residential development, and is set out in the HJL Design Statement.

6.3 Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)

The Sustainable Urban Housing Design Standards for New Apartments were approved by the Minister for Housing, Planning and Local Government and published in March 2018, and updated in December 2020 in respect to Shared Accommodation only. The Guidelines update previous guidance from 2015 and note that this is done *'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. This requires at least half of new homes within Ireland's cities to be provided within the current built-up area of each city, 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 undeveloped lands in the North 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', being immediately adjacent to Clongriffin Dart Station and on a quality bus network. As highlighted elsewhere in this Report it is anticipated that Clongriffin will be served by the future BusConnects Core Route Corridor.

This SHD Planning Application is accompanied by a Housing Quality Assessment (HQA), prepared by HJL Architects which demonstrates the compliance of the proposed development with the relevant quantitative standards required under the Apartment Guidelines 2020.

The HQA illustrates in tabular format how each apartment unit 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 proposed development provides for 665 no. residents' car parking spaces associated with the 1,221 no. residential units - an overall provision of 0.54 no. spaces per unit. This includes for 33 no. parking spaces at surface level.

The TIA prepared by Cronin Sutton, provides further details and a justification for this level of car parking as it relates to the site's accessibility to public transport and employment zones.

In addition high-quality cycle parking and associated facilities are provided in the proposed development with a total of 2,021 provided for residents and 312 provided for visitors and commercial uses. Residents parking is provided in secure locations in addition to visitor spaces located throughout the landscaped open space in the scheme providing easy access for visitors to apartment occupiers. Bicycle parking provision is also in line with Government Guidelines as set out above, exceeding Fingal Development Plan requirements. The scheme has been designed to allow for future increase in cycle parking capacity should future use patterns require.

The TIA prepared by Cronin Sutton provides details and a justification for the level of cycle parking proposed.

6.4 Urban Development and Building Heights, Guidelines for Planning Authorities (December 2018)

The Urban Development & 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 proposed scheme, as set out in this Planning Application to ABP seeks to achieve greater height and density without compromising residential amenity. The site’s suitability for this approach is set out in detail, as considered against the Guidelines in Section 6.2 of this Report. It is considered that the subject site is a good example of a site which can achieve increased building height and resulting increased density, on a highly accessible site within the Dublin Metropolitan Region.

6.5 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 City 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 undeveloped 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).

6.6 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. While most of the surrounding lands are currently undeveloped, we note the extant permissions to the east.

The subject application delivers a large portion of the Local Area Plan lands which, together with Growth Area 01, have been considered as part of a single design strategy. The design, layout and the scaling of the subject development responds to these future adjacencies ensuring minimal impact on residential amenity while at the same time providing an appropriate transition in 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 north east of the Clongriffin DART station. The wider landholding is 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 and via Racecourse Park 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 Longfield Road to the south and east. Motor traffic is present only where required, with measures taken to prioritise the pedestrian and the cyclist within the public realm.

The site is 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. 1³).

³ <https://busconnects.ie/media/1816/01-clongriffin-to-city-centre-preferred-route-180220-fa-web.pdf>

The site is within short walking distance of the Baldoyle Industrial Estate c.680m to the south providing a large amount of employment and commercial activity.

The proposed development provides for a mix of high quality 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 have completed a high quality segregated cycle route from Baldoyle along the R106 Coast Road to Portmarnock which will form part of a longer route along the coast. The proposed development will enable local connections from Clongriffin and the Racecourse Park to existing and new routes, thereby enhancing their use.

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 studio, 1-bed, 2 bed and 3- bed units.

Together with GA1 the subject proposed forms part of a wider development strategy for the lands. GA1 provides for a significant quantum of non-residential and commercial uses in the village centre whereas GA3 provides for future transition to the Racecourse Park.

The subject application will compliment this provision through a small scale retail unit, tenant amenity and crèche which will provide primarily for future residents:

Use	Size (sqm)
Crèche (excl. External Space of 123 sq.m)	452
Restaurant/ Café	205

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 site. The site is located 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 Baldoyle-Stapolin LAP itself highlights the opportunity at the lands to the south

of the former Baldoyle Racecourse to create a new, diverse community on a compact urban footprint.

The scheme as proposed will provide 1,221 residential units resulting in a potential population of up to c. 2,808, based upon an average household occupancy of 2.3 for new development areas in the area (2.3 per apartments), in addition to new retail, community and employment uses. It is acknowledged here that given the inclusion of a wider range of apartment sizes (inclusion of studio and 1-bed units) to cater for a diverse population mix, the 2.3 household size may be larger than what can be expected across the proposed development.

The proposed density of 177 u/ha is as a result of the wider development strategy. The masterplan gives effect to the density and heights established in the Baldoyle Stapolin LAP. The height and massing is maintained at the extremities of the site, along the railway and park, to allow the open spaces within to breathe. The main thoroughfares are defined and enhanced by special buildings, such as the tower and park pavilions, which orientate the scheme. A variety of materials and design details provide distinctive character to the different areas of the masterplan.

The proposed development makes optimum use of pre-existing infrastructural investment including high quality public transport, roads and open space 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 the large quantity of open space, which combined contribute to creating a sense of place on this significant site.

The proposal for Growth Area 3 revolves around the concept of pulling the adjacent parkland through the development. A Green Artery runs through the centre of the site, creating a natural link and gateway to the park from the site and surrounding area.

GA3 provides a transition from the more urban character of the proposed Stapolin Square in GA1 to the open parkland setting of the Racecourse Park.

The streetscape and buildings have been arranged to enhance the sense of connection to the park. The primary 'green artery' of Longfield Road provides a clear, legible orientation towards Racecourse Park. It relates 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.

These locally accessible open spaces provide amenity transition spaces between high density residential areas and the Regional Park.

The Applicant has undertaken a Place-Making Study for Baldoyle-Stapolin, to create a *'people-focussed development with an emphasis on great design and quality'*, harnessing the areas particular character and attributes, to create a community and sense of place from the outset. This Study was fully embedded in the design development process as the proposal evolved.

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.

Duplexes, own door apartments and amenity uses are located at ground floor to lend activity, animation and passive surveillance to streets and shared spaces. Ground floor apartments are avoided in favour of duplex units.

Block volumes open up to semi-private communal open spaces; located for good daylight access and to maximise passive surveillance. The communal open spaces to the F blocks benefit from a west-facing aspect and contribute to the 'greening' of Longfield Road. The G blocks benefit from generous communal spaces with views northwards over Racecourse Park.

The communal open space to Blocks E1/E2 benefit from a south-facing aspect and have a physical connection to the Community Park. The communal open space to E3 & E4 (the pavilion blocks) lies between them, with an east-west aspect.

Adaptability: How will the buildings cope with change?

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 units that can allow for occupancy as life cycles and personal needs of each resident change.

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

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

The vision for public realm of Project Shoreline is to create a richly landscaped urban setting with an efficient use of land, promoting sustainable densities. A

Green Artery running through the centre of the site, provides a connection between all public spaces through the site.

Bernard Seymour Landscape Architects have designed a high quality landscaped environment which complement the Architectural intent for the buildings.

Longfield Road is the main north-south route through the masterplan, designed to connect all public spaces together, it provides our green artery through the scheme. Longfield also provides the primary link from the surrounding area to the Racecourse Park in the north.

The road is framed to the north by the node of Zone G tower, which helps to orientate the street. The intricate lattice balcony design of the Zone E park pavilions create rhythm along the street, with glimpses and connections to the urban park beyond. On-street parking and cycle parking is provided along the length of the street, but great care has been taken to break up these spaces with intermittent planting, to create a softer space and comfortable environment.

Parking: How will the parking be secure and attractive?

Car parking is primarily located at basement or at ground level below podium in respective blocks. 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, a significant quantum of cycle spaces cycle parking spaces are provided. 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 general approach to the architecture of the scheme is to consider the buildings within the context of a highly developed public realm. The buildings seek to enhance the public realm by creating an appropriate backdrop to it rather than acting as distinct separate elements. The buildings scale and materiality are all considered, creating a distinctive language for the various areas of the scheme through an individual and varied palette of materials.

The architecture can be described as having a sense of quietness and simplicity to it. Highly emphasized architectural elements are kept to a minimum on particular feature buildings, with the remaining focus being placed on high quality materials and detailing. The use of brick throughout the development seeks to create a sense of human scale, texture and a common link to all buildings in the development.

Careful consideration has been given to the building's setting out, massing and scale in the context of enhancing the public realm, the buildings are seen as giving form to the public space.

The landscape design strategy is set out in the Landscape Design Report incorporating the strategy prepared by BSLA. Green Artery running through the centre of the site, provides a connection between all public spaces through the site. The community park is at the centre of the masterplan, running north-south parallel to Longfield road, there are a number of visual and physical links between the park and the green artery of Longfield road. Longfield Plaza at the northern end of Longfield road provides a stop-end to the road. The plaza is provided as a hard-landscaped open space and envisaged as a lively active space, provided with a cafe and outdoors seating.

The proposed development provides 4.99ha public open space, meeting 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 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 landscape design strategy can be found in the HJL Design Statement and the BSLA Landscape Design Report which accompanies this Planning Application.

7 PROPOSED DEVELOPMENT

7.1 Overall Design Rationale

The vision for the subject lands is to create a richly landscaped urban setting with an efficient use of land, promoting sustainable densities, with the aim of creating a highly articulated public realm with a broad mix of uses, in a manner that promotes the development of a new vibrant community.

The proposal for Growth Area 3 revolves around the concept of pulling the adjacent parkland through the development. A Green Artery runs through the centre of the site, creating a natural link and gateway to the park from the site and surrounding area.

The series of heavily landscaped streets and green corridors, informed by the LAP, have been integral to the design. The buildings have been designed to respond to these green amenity spaces, while the central public park at the heart of the site is expanded to provide a generous amenity for the proposed residential development.

The proposed development gives effect to the density and heights established in the Baldoyle Stapolin LAP. The height and massing is maintained at the extremities of the site, along the railway and park, to allow the open spaces within to breathe. The main thoroughfares are defined and enhanced by special buildings, such as the tower and park pavilions, which orientate the scheme. A variety of materials and design details provide distinctive character to the different areas of the masterplan.

The proposal will provide 1,221 high-quality homes in a mix of studio, 1-, 2- and 3- bed units, across a mix of apartments and own-door duplexes. Active uses, such as residential amenity, own-door units, a restaurant/cafe offering and a crèche are located at ground floor along the primary Longfield Road Spine.

7.2 Height

The proposed strategy broadly aligns with the intent of the LAP Height Strategy, in respect of where increased height should be located, however, as discussed in the Material Contravention Statement prepared by BSM, it exceeds the upper limit of the LAP's height guidelines, which identifies maximum building heights at key locations for additional height within the lands. The proposed taller buildings provide a high quality response to the site context providing variation in scale, massing and height at these key locations, and responds to general development patterns in the area, as per the adjacent Clongriffin development. This has resulted in an attractive streetscape characterised by high quality materials, finishes and palettes. The location of the taller blocks has been carefully considered with regard to residential amenity including overshadowing, daylight/sunlight and microclimate parameters.

The LAP states that building height limits are shaped by three considerations, including:

- *'the desire to create a sustainable development that maximises the strategic location of the site adjacent to Clongriffin station and provide a critical mass to support functions and services to serve the area;*
- *climatic factors including the need for shelter from the prevailing wind and;*
- *achieving variation across the site while at the same time trying to ensure a visually attractive, cohesive and uniquely urban development.'*

We submit that the proposed development is consistent with the above considerations and succeeds in locating higher buildings which contribute to the objectives for the LAP lands.

The proposed building height strategy can be summarised as follows:

- Block E1, ranging in height from 5 to 8 storeys,
- Block E2, at 5-6 storeys,
- Block E3, at 6 storeys,
- Block E4, at 5 storeys,
- Block F1, ranging in height from 2 to 5 storeys,
- Block F2, ranging in height from 2 to 6 storeys,
- Block G1, ranging in height from 4 to 10 storeys,
- Block G2, ranging in height from 4 to 10 storeys,
- Block G3, at 7 to 15 storeys,
- Block G4, at 7 storeys,
- Block G5, ranging in height from 4 to 10 storeys.

Please see respective reports enclosed including HJL Design Statement, Daylight Sunlight Analysis, prepared by OCSC, and Wind Microclimatic Assessment, prepared by B-Fluid.

The *Urban Development & Building Height Guidelines* establish the principle for the re-examination of height limits and should now be considered over the LAP height limits on a site specific contextual basis and considered against the criteria set out in SPPR 3.

Site Context & Location

The subject lands are located adjacent to a high frequency rail 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 / Baldoyle-Stapolin will be served by a future upgraded Bus Connects route (Core Bus Corridor Route No. 1⁴).

⁴ <https://busconnects.ie/media/1816/01-clongriffin-to-city-centre-preferred-route-180220-fa-web.pdf>

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 discussed in Section 3.3, the recently permitted Clongriffin SHD applications serve to inform the scale of the proposed development. The proposed development will provide a transition between the existing residential areas to the south and east, 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.

This proposed development, in combination with the GA1 alteration application currently with ABP relating to the remainder of the lands in the ownership of the Applicant, considers the wider landholding as part of a single development strategy. The height strategy has been prepared in such a way that allows a comprehensive response to the site and its context. This is set out further in the Architects Design Statement.

Development Management Principles and Criteria

Section 3.2 of the *Urban Development & Building Height Guidelines* provides guidance for Planning Authorities/An Bord Pleanala in considering development proposals for buildings taller than prevailing building heights in pursuit of the Guidelines.

These are considered, in relation to the proposed development, as follows:

	Baldoyle Scheme
Principles	
Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?	Yes, the scheme provides for a high quality residential development on a site zoned for residential use, subject to a LAP and proximate to high frequency public transport. The scheme, as proposed, delivers 1,220 residential unit in addition to other commercial uses and building on the proposed amenities as part of proposed alterations to existing permitted GA01 Lands to the south.
Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?	Yes- the proposed development is fully in line with Development Plan and Local Area Plan objectives for the delivery of residential development on these lands, except where clearly set out in this report.
Where the relevant development plan, local area plan or planning scheme pre-	Yes, the Local Area Plan was adopted prior to the publication of the Urban

<p>dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework</p>	<p>Development & Building Height Guidelines and as such, sets numerical height caps now which the Guidelines are superseded by these Guidelines recommend against the inclusion of, and permits the consideration of proposed schemes against criteria set out in SPPR3. However the subject site is located within an area identified for consolidation as it is within the urban extent of Dublin but is restricted currently in relation to height. These objectives are evident in the NPF, RSES and Fingal Development Plan.</p>
<p>Criteria</p>	
<p>City/Town Scale</p>	
<p>The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport</p>	<p>Yes, the site at Baldoyle is in a highly accessible location, immediately adjacent to an existing rail station (within 400m), and being within walking distance to an existing bus route and will be serviced in the future by an upgraded BusConnects route.</p>
<p>Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.</p>	<p>The scheme has been prepared as part of a wider strategy for the landholding. This strategy responds to the local context providing a coherent strategy and response to the setting and key sensitivities.</p> <p>A Landscape and Visual Assessment has been prepared by Chris Kennett at Kennett Consulting Ltd. and forms part of the EIAR enclosed with this Planning Application.</p>
<p>On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</p>	<p>As outlined above the approach to height both responds to the existing context and provides for a new context in appropriate areas of the site. This approach is achievable on this site due to the scale of this site and a comprehensive response to the landholding. It integrates with both existing and permitted developments. The streetscape and buildings have been arranged to enhance the sense of connection to the village centre and the surrounding open spaces.</p>

District/ Neighbourhood/ Street Scale	
<p>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape</p>	<p>Yes, it is considered that this proposed scheme contributes in both placemaking and to the wider neighbourhood of Baldoyle and Clongriffin.</p> <p>The scheme is completing the eastern side of the new urban centre at the North Fringe. In addition to the high quality residential uses and the extensive public open space, the scheme includes retail and crèche uses which will contribute to the locality.</p>
<p>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</p>	<p>The proposed development incorporates a variety of building forms, heights, and façade treatments, creating diversity yet presenting a unified approach to built form at this location, ensuring a variety in appearance within the streetscape.</p>
<p>The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).</p>	<p>It is considered that this proposed scheme contributes in both placemaking and to the wider neighbourhood of Baldoyle and Clongriffin. The additional height is appropriately located on the site at the northern edge adjacent the expansive future Racecourse Park acting as a key boundary to the site. The sense of enclosure created is in proportion to the streets and open spaces.</p>
<p>The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</p>	<p>The proposed development includes a carefully considered movement strategy. This includes a series of new roads, footpaths and cycle paths through the site. Thus contributing to the wider area by providing access routes to the cycle path network, the coastal route and the train station.</p>
<p>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</p>	<p>In keeping with the objectives and policies for the site it is proposed to provide for additional uses to meet residents’ needs. The scheme provides for both a mix of unit types and a mix of uses and high quality open spaces and connections.</p>

Site/Building Scale	
<p>The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</p>	<p>As outlined previously the buildings range in height from 2 to 15 storeys in order to both respond to the existing context and to ensure minimal impact on daylight or sunlight quality on future residents. The design entails a variation in height and massing at key locations to ensure public and private open spaces are not compromised. Detailed analysis of this consideration have been carried out by the design team.</p>
<p>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight (2nd Edition or BS 8206-2:2008 – ‘Lighting for Buildings- Part 2: Code of Practice for Daylighting’.</p>	<p>A Daylight and Sunlight Report, prepared by OCSC, is included in this SHD Planning Application to An Bord Pleanala. This report considers the proposed development and considers it appropriately and reasonably against the relevant quantitative standards, providing for justification for the proposed levels of daylight and sunlight achieved. It concludes that the proposed development will be a high quality scheme with well-lit units and sunlight external spaces.</p>
Specific Assessments <i>(which may be required and these may include)</i>	
<p>Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.</p>	<p>A Wind Impact Assessment, prepared by B-Fluid, is included in this Planning Application. It has been prepared as an iterative process throughout the design process identifying where any problem areas exist and what mitigation is required to address them. This mitigation has been incorporated into the architectural and landscape design as submitted.</p>
<p>In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.</p>	<p>The proposed development involves the development in apartment blocks ranging in height from two-storeys to fifteen-storeys in the vicinity of a SPA. It should be noted that the buildings are within an existing suburban environment with existing apartments (5 storeys) between the proposed development and the SPA. In addition there are 6 storey buildings to the west, in the vicinity of Clongriffin Railway Station. The proposed</p>

	development is taller than the heights of buildings in the vicinity of the proposed development. The buildings are within a developed area with buildings of varying heights and would not generate a particular risk in relation bird or bat strikes. The buildings to be constructed of both concrete based material as well as glass and would be clearly visible to bird and bat species. During the wintering bird assessment no significant flight lines for qualifying interests of the Baldoyle SPA were observed in the vicinity of the proposed development. During the bat assessment no bats were observed on site. As a result, impacts on bats, flight lines or qualifying interests of the SPA would not be expected.
An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.	The scheme as proposed is not considered to impact any such links or channels.
An assessment that the proposal maintains safe air navigation.	As the site is not located within any identified flight paths, it is considered that safe air navigation is maintained and as such no assessment, as identified in SPPR3 was considered to be required.
An urban design statement including, as appropriate, impact on the historic built environment	This is considered in both the EIAR in the Cultural Heritage & Archaeology Report in respect of the built environment but also in the HJL Design Statement in regards to proposed build form and materials.
Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	As the site is over 500 units an EIAR accompanies this SHD Planning Application. A full EIAR has been carried out as required by the EIA Directive and fully considers the extent of the proposed scheme. Additionally an AA Screening Report and a Natura Impact Statement is included with the application.

The Guidelines in relation to these state that:

Where the relevant planning authority or An Bord Pleanála considers that such criteria are appropriately incorporated into development proposals, the relevant authority shall apply the following Strategic Planning Policy Requirement under Section 28 (1C) of the Planning and Development Act 2000 (as amended).

SPPR 3 in this regard states:

It is a specific planning policy requirement that where;

- 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and*
- 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan, local area plan or planning scheme may indicate otherwise.*

As is outlined in this report and the other documentation accompanying this Planning Application, the subject site is a prime example of the type of site anticipated in the Guidelines that can achieve increased building height and resulting increased density, without impacting negatively on the surrounding environment.

7.3 Residential Accommodation

The proposed scheme comprises 1,221 units, with a mix of generously sized, studio, 1, 2 and 3 bed apartments and own door duplex units. The proposed scheme provides the following unit mix:

- Studios 0.1 %
- 1 beds 41.1%
- 2 beds 52.1%
- 3 beds 6.7 %

The apartment buildings have been positioned to ensure minimal overshadowing, which will provide ground floor apartments and open spaces with good levels of daylight.

The variety of apartment blocks types, lengths and heights will create a sense of place, visual interest and variety.

The buildings will have their own identity and the inclusion of shared tenant amenity facilities will foster a sense of community.

7.4 Other Uses and Ground Floor Units/Active Uses

The scheme also provides for non-residential uses including tenant amenity and other uses which will provide primarily for the needs of future residents but also some local services for existing residents, and will complement the Village Centre being provided at Baldoyle Stapolin under GA1 proposed development, and the wider Clongriffin area.

The proposed development entails the following non-residential uses:

Use	Size (sqm)
Crèche (excl. External Space of 123 sq.m)	452
Restaurant/ Café	205

A variety of amenity spaces are distributed throughout the development. Ground floor amenity spaces have associated external break out terraces. Informal seating areas will be provided throughout the proposed development.

A new crèche is proposed on the site to cater for the needs of the development. The proposed crèche is 452 sqm with an external play area. The crèche will be located on the ground floor of Block G4. Parking spaces will be provided for drop off along with staff parking at ground floor level. The external play area associated with the crèche will be of a high quality, suited to the needs of the age groups provided for.

See the Schools Demand Assessment & Childcare Facilities Report submitted with this application, for further details and rationale for proposed childcare provision.

7.5 Open Space & Public Realm

Open Space Provision

The proposed development proposes c.4.99 ha of public open space, meeting and exceeding FCC requirements on public open space provision for GA3 Lands. This is provided in the form of 1.25 ha of Class 2 Public Open Space in the form of small parks and pocket parks, and Class 1 Open Space of 3.74 ha.

The proposal provides 0.6 ha of Class 2 Public Open Space on site in the form of small parks and pocket parks. There is also an additional 0.65 ha of Class 2 Public Open Space provided within the previously permitted The Haggard Park (as per FCC Reg. Ref. F16A/0412, ABP Reg. Ref. ABP-248970 (and as amended under F20A/0258 and F21A/0046)). Please see planning report for details. This amounts to 1.25 ha of Class 2 Open space which is 25% of the Public Open Space requirement. This provision meets the required quantity 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 HJL Design Statement, Section 4, for further detail in relation to the proposed development.

Class 1 Open Space

Class 1 Open Space provision is indicated within the future planned Racecourse Park lands.

The lands within the ownership of the applicant at Baldoyle are being delivered in accordance with the requirements of Fingal Development Plan 2017-2023 and the Baldoyle – Stapolin Local Area Plan 2013 (as extended). Specifically, residential development areas in the applicant's ownership lie within Growth Area 1 (GA1) and Growth Area 3 (GA3), while lands beyond to the north and east are identified as open space, to include for 'Racecourse Park'. In relation to the open space lands it is noted in the LAP that '*... the Council has secured a significant portion of the open space lands (c.40 ha). As part of this, playing fields, changing facilities and a playground have been provided to the southeast of the plan lands just to the north of Admiral Park. Over time, the remainder of the parkland will come into Council ownership.*' (section 2.3.1.3, pg.8).

The existing permitted, and as proposed to be altered, GA01 Lands, which as set out in the LAP and previous permission, includes delivery of c.1.5ha of open space known as 'The Haggard' located at the heart of the residential development area, as well as Stapolin Square (extended from a permitted c.0.4ha to a proposed c.0.574ha), part of Stapolin Avenue and additional green space in the form of pocket parks, communal spaces, private gardens and green roofs.

As noted at section 4A.6.2 of the LAP, 'Stapolin Haggard' '*...will act as the central open space at the heart of the new community. It will have strong links to Racecourse Park but, unlike the parkland area, will be fully open to use by members of the community, for activities such as dog walking, informal ball games and other passive recreational activities.*' (pg.23). The existing permission for GA01 provides within the Haggard for c.1,500sqm of dedicated play space, a 250sqm MUGA, and 30 pieces of play equipment and play structures. It also provides for a surface water attenuation feature / wetland, which is currently under construction within the lands to the north of GA3, part of the future Racecourse Park. This permitted wetland has been sized to cater for the combined surface water requirements of GA1, GA2 and GA3.

For the purposes of compliance with Development Plan and LAP standards, the application identifies how requirements for Class 1 open space can be accommodated within the wider future open space lands in the control / ownership of the applicant which will form part of the future Racecourse Park. It is considered that the transition to the adjacent High Amenity Lands will be the subject to a future S.34 Planning Application to incorporate this transition space

into the wider development context, and in particular to respond to the future Racecourse Park.

In respect of the Racecourse Park Lands, the applicant has come to an agreement with Fingal County Council for future transfer of ownership of the open space lands / Racecourse Park lands to the Council in conjunction with its plans for the delivery of the Racecourse Park. Through on-going liaison with Fingal County Council, the applicant is fully aware and supportive of the plans of the Council to design, seek permission for, and eventually deliver proposals within the future 'Racecourse Park'. In this regard the applicant has provided Fingal County Council with a letter of consent to support the Council's forthcoming application to An Bord Pleanála for planning approval for the Racecourse Park.

A letter from Fingal County Council committing to the delivery of Racecourse Park upon transfer of lands to Fingal County Council is included in Appendix 2 of the Planning Report.

7.6 Access, Car & Cycle Parking

The *Sustainable Urban Housing, Design Standards for New Apartments* seek to minimise car-parking in accessible locations and to maximise a modal shift to public transport due to proximity to public transport routes, in particular the DART and Dublin Bus at this location.

The proposed development shall include a total of 665 no. car parking spaces (including car-club and surface level spaces) associated with the 1,221 no. residential units (an overall provision of 0.54 no. spaces per residential unit), with an additional 8 no. crèche parking spaces provided. (See Cronin Sutton Traffic Impact Assessment Report which accompanies this Planning Application).

The 0.54 spaces per unit is below the Development Plan requirement of 1 per unit however given the scheme's highly accessible location adjacent the DART line, it is considered appropriate in ensuring a sustainable urban development form. This is considered further in the accompanying Traffic Impact Assessment and Residential Travel Plan Report prepared by Cronin Sutton.

In addition high-quality cycle parking and associated facilities are provided in the proposed development with a total of 2,021 provided for residents and 312 provided for visitors and commercial uses. Residents parking is provided in secure locations in addition to visitor spaces located throughout the landscaped open space in the scheme providing easy access for visitors to apartment occupiers. Bicycle parking provision is also in line with Government Guidelines as set out above, exceeding Fingal Development Plan requirements.

The proposed residential development will promote sustainable travel patterns due to its location, layout, design and proximity to the public transport and cycle networks. These will be complemented with a Residential Travel Plan and the appointment of a Mobility Manager to promote sustainable travel patterns by residents.

The proposed residential development is located such that it will not have any traffic impact on the existing residential development in the area. The access and internal layout is designed in accordance with DMURS and includes for good permeability and will promote and facilitate sustainable travel patterns as part of the overall development.

See the accompanying Cronin Sutton DMURS Statement of Consistency.

7.7 Residential Development Standards

The proposed development is fully in compliance with the Fingal County Council Development Plan Standards, as set out in Chapter 12, and where superseded by the *Sustainable Urban Housing: Design Standards for New Apartments-Guidelines for Planning Authorities'* of December 2020.

This section of the Planning Report sets out compliance with these standards in tandem with the detail set out in the Housing Quality Assessment Table (HQA) prepared by HJL Architects which is included with this Planning Application.

7.7.1 Residential Quality Standards

Unit Mix

The proposed mix is in compliance with the unit mix requirements of SPPR 1 of the Apartment Design Guidelines which states:

SPPR 1

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms.

The proposal includes the following mix:

- Studios 0.1 %
- 1 beds 41.1%
- 2 beds 52.1%
- 3 beds 6.7 %

Floor Areas

The proposed floor areas are in compliance with the amended mix requirements of SPPR 3 of the Guidelines which states:

SPPR 3

Minimum Apartment Floor Areas:

• Studio apartment (1 person)	37 sq.m
• 1-bedroom apartment (2 persons)	45 sq.m
• 2-bedroom apartment (4 persons)	73 sq.m
• 3-bedroom apartment (5 persons)	90 sq.m

The proposed development includes units with the following minimum floor areas for each type:

• Studios	43.5 sqm
• 1 beds	46.1 sqm
• 2 beds	74 sqm
• 3 beds	91.6 sqm

Further it is a requirement that the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%).

The proposed residential units meet or exceed the minimum standards for apartment sizes. All units are above minimum floor standards and many exceed these standards significantly.

Compliance with minimum aggregate floor areas and widths for living/dining/kitchen rooms and bedrooms is outlined in the HQA as prepared by HJL Architects, and submitted with this application.

Private and Communal Amenity Space

The Guidelines state that private amenity space shall be provided in the form of gardens or patios / terraces for ground floor apartments and balconies at upper levels. Where provided at ground floor level, private amenity space shall incorporate boundary treatments appropriate to ensure privacy and security.

Where balconies or terraces are provided, they should be functional, screened with opaque material, have a sunny aspect, and be of a minimum depth of 1.5m.

The Guidelines require the following minimum balcony sizes:

- Studio 4 sq.m
- 1-bed 5 sq.m.
- 2-bed 7 sq.m.
- 3-bed 9 sq.m.

The proposed balconies meet or exceed the minimum standards for private open space.

The Guidelines also require that communal amenity space must be provided within a scheme which can be in the form of courtyards, roof gardens etc. In addition, in larger schemes communal internal spaces are to be provided for residents use only i.e. multi-purpose rooms, cinema rooms, gym etc.

The HJL Design Statement sets this out further.

The Guidelines require the following minimum communal open space areas:

- Studio 4 sq.m
- 1-bed 5 sq.m.
- 2-bed 7 sq.m.
- 3-bed 9 sq.m.

	Required Sq.m	Provided Sq.m
Blocks E1/E2	1,457	1,998
Block E3	265	289
Block E4	212	289
Blocks F1	575	606
Blocks F2	760	1,016
Block G1/G2/G3	2,955	4,235
Block G4/G5	1,481	1,830
Total	7,705	10,263

The total communal open space requirement for the development is therefore 10,263 sq.m, which exceeds requirements by c.40%.

The proposed development also proposes internal tenant amenity spaces which totals 2,301 sqm in size within the building envelope of the residential blocks. It is considered that this will take the form of multi-purpose rooms, working spaces, Wi-Fi zones, games rooms, meeting rooms, gym, cinema rooms etc.

Storage

The Guidelines states that minimum storage requirements must be met as follows:

- Studio 3 sq.m
- 1-bed 3 sq.m.
- 2-bed 6 sq.m.
- 3-bed 9 sq.m.

The proposed residential units meet or exceed the minimum standards for storage areas.

Aspect

With regards to dual aspect units the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) in Section 3.17 require that a minimum of 33% of the overall number of units in a scheme should be dual aspect *'in more central and **accessible and some intermediate locations**, i.e. on sites near to city or town centres, **close to high quality public transport** or in SDZ areas, or where it is necessary to ensure good street frontage and subject to high quality design' (our emphasis).*

While SPRR4 states *'In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply: (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate'.*

The Development Plan standards state that apartment units shall be provided with a good level of daylight and sunlight which contribute to a high quality living space.

Additionally the 2020 Guidelines state at Section 3.18 that *"Where single aspect apartments are provided, the number of south facing units should be maximised, with west or east facing single aspect units also being acceptable. Living spaces in apartments should provide for direct sunlight for some part of the day. North facing single aspect apartments may be considered where overlooking a significant amenity such as a public park, garden or formal space or a water body or some other amenity feature."*

The proposed scheme is in compliance with the requirements of Section 3.17 and SPPR 4 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) by providing for 42% of dual aspect units on this highly accessible site which sits integrated with Clongriffin Train

Station, provides for a comparable level of development to the adjacent Clongriffin Development and provides for a high quality design and streetscape.

Floor to Ceiling Heights

The proposed mix is in compliance with the amended mix requirements of SPPR 5 of the Guidelines which states:

SPPR 5

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

The Guidelines identify that 2.4m is standard good practice however 2.7m would be a minimum standard for ground floor apartments but a higher ground floor should be considered where apartments are not proposed at ground level.

The proposed scheme has residential ground floor, floor to ceiling heights of 2.7m with all upper floors at 2.4m.

Detailed daylight assessment has been carried out on the proposed development by OCSC, and is outlined in greater detail in their Daylight Sunlight Report accompanying this Planning Application.

Lift and Stair Cores

The proposed mix is in compliance with the amended mix requirements of SPPR 6 of the Guidelines which states:

SPPR 6

A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.

The proposed development has sought to minimise the number of cores and maximise the number of apartments off each and typically, the blocks have 5-12 apartments per core in compliance with the standards.

Internal Space Configuration

Minimum internal space requirement for living/dining/kitchen rooms and bedrooms are set out in the Development Plan. Compliance with the internal rooms sizes are demonstrated in the HOA Table included in the HJL Design

Statement. It is set out that all of the proposed units meet or exceed the Guidelines requirements.

7.8 Childcare Facilities

The 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 developments 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* 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 41% studios and one bed units apartments which as per the above, the studios and one beds at a minimum should be discounted in the calculation of the requirement for childcare spaces.

The proposed crèche is c.452 sqm with an external play area of c.123 sq.m, and will cater for c.113 no. child places. The crèche will be located on the ground floor of Block G4. Parking spaces will be provided for drop off along with staff parking at ground floor level. The external play area associated with the crèche will be of a high quality, suited to the needs of the age groups provided for.

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 Childcare Facilities Assessment found that there are a number of crèches operating in the area and a number of new crèches permitted the area.

As such it is considered that the proposed crèche will meet future residents demand for childcare facilities. Please see the Schools Demand & Childcare Facilities Report submitted with this application.

7.9 Sunlight and Daylight

The overall configuration and design of the proposed development has been influenced by the need to achieve the best possible levels of sunlight and daylight penetration into the development. The proposed orientation of the blocks represents the best response to the site context in terms of day light and sunlight availability as a result of the density and height proposed. The Architectural Design Statement prepared by HJL accompanying this Report, sets out how the internal elevations are designed to address sunlight and daylight optimisation in terms of reflectivity and lightness of materials proposed.

Detailed Daylight and Sunlight assessment has been carried out on the proposed development by OCSC, and is outlined in greater detail in their accompanying Daylight Sunlight Report.

The analysis confirms that across the entire development excellent levels of internal daylight are achieved. The majority of apartments and all houses not only meet but greatly exceed the recommendations outlined within the BRE Guidelines and British Standard BS8206, achieving a 97.8% compliance rate across the proposed units. The annual probable sunlight hours assessment has shown that even though some windows are slightly under the BRE recommendations, acceptable levels of sunlight will still be achieved within the proposed development.

In terms of sunlight access, excellent levels of sunlight are experienced across the development. The communal amenity spaces provided to the apartment areas greatly exceeds the BRE guidelines for sunlight on the test day of 21st of March, as well as the private gardens to houses.

The analysis also shows that the proposed building has imperceptible daylight, sunlight or overshadowing impact to neighbouring properties.

All calculations within this report follow the methodology for daylight and sunlight outlined on the British Research Establishments "Site Layout Planning for Daylight and Sunlight: A Good Practice Guide" by PJ Littlefair, 2011 Second Edition.

7.10 Wind Microclimate Study

A Wind Microclimate Study prepared by B-Fluid is included as part of this SHD Planning Application documentation. Through the wind assessment it has been possible to highlight, at design stage, areas of potential concern in terms of downwash/funnelling/downdraft/and to identify critical flow accelerations that could potentially occur. Results of the wind analysis have been discussed with the design team so as to configure the optimal layout for this proposed development for the objective of achieving a high-quality environment for the scope of use

intended of each areas/building (i.e. comfortable and pleasant for potential pedestrian) and without compromising the wind impact on the surrounding areas and on the existing buildings.

The Report shows that the development has been designed to be a high-quality environment for the scope of use intended of each areas/building, and from a quantitative point of view, it does not introduce any major or critical impact on the surrounding areas and on the existing buildings.

8 PART V REQUIREMENTS

The proposed scheme has been designed in a manner to ensure an appropriate mix and location of Part V units in the proposed development. The Part V units are identified and proposed to be incorporated into Block F2.

It is proposed to develop 1,221 no. units at the site and the Applicant proposes 122 no. Part V units with a mix of unit types.

The applicant has engaged with Fingal County Council and a letter from Fingal County Council is included as part of the Part V pack in this regard.

9 ENVIRONMENTAL CONSIDERATIONS

9.1 APPROPRIATE ASSESSMENT

An Appropriate Assessment (AA) Screening Report is submitted to An Bord Pleanála with the SHD Planning Application prepared by Altamar, which concludes that a Natura Impact Assessment Report (NIS) is required for this application for development. As such a NIS is included in the application which concludes that no significant effects are likely on Natura 2000 sites, their features of interest or conservation objectives. The proposed project will not will adversely affect the integrity of European sites.

9.2 ENVIRONMENTAL IMPACT ASSESSMENT REPORT

The revised 2014 EIA Directive (Directive 2014/52/EU amending Directive 2011/92/EU) uses the term environmental impact assessment report (EIAR) rather than the previous environmental impact statement (EIS). Where current national guidelines and regulations refer to an Environmental Impact Statement or EIS, this can be taken to mean an Environmental Impact Assessment Report (EIAR).

Projects requiring environmental impact assessment are listed in Parts 1 and 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended).

Schedule 5 (Part 1) of the Planning & Development Regulations 2001 (as amended) lists major project classes for the purposes of mandatory EIA, which typically include industrial, chemical, energy, waste, infrastructure and intensive agricultural developments. The proposed development at Baldoyle does not correspond to a development set out under Part 1 of Schedule 5 and therefore, EIA is not a requirement under this provision.

Schedule 5 (Part 2) of the Planning & Development Regulations 2001 (as amended) set mandatory thresholds for each project class above which EIA is required. Sub-sections 10(b) (i) and 10(b) (iv) addresses 'infrastructure projects' referring to housing and urban developments, and require that the following classes of project, relevant to this project, be subject to EIA:

*"Class 10(b) (i). Construction of **more than 500 dwelling units.**"*

*"Class 10(b) (iv). Urban development which would involve an area greater than 2 hectares in the case of a business district, **10 hectares in the case of other parts of a built-up area** and 20 hectares elsewhere." [Our emphasis]*

The proposed development involves the construction of a residential development of 1,221 no. residential units on a site of 6.89 ha hectares on the northern fringe of Dublin city.

As such an Environmental Impact Assessment Report (EIAR) is submitted to An Bord Pleanála with this SHD Planning Application.

10 CONCLUSION

It is respectfully submitted that the proposed development will provide an appropriate form of high quality residential development for this zoned undeveloped site. This Planning Report demonstrates that the proposed development is fully in accordance with recent Government guidance in relation to the delivery of apartment developments, *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities*, December 2020 (Dept Housing, Planning & Local Government), Fingal County Development Plan 2017-2023, the Balydoyle Stapolin Local Area Plan (2013 as extended), and with the intent of the *Urban Development & Building Heights Guidelines* (2018), and with the proper planning and sustainable development of the area.

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 constitutes a reasonable basis for an application for development.

APPENDIX 1: COMMUNITY FACILITIES OVERVIEW

Baldoyle Community Infrastructure Overview

Introduction

This Community Infrastructure Overview has been prepared by Brady Shipman Martin in support of the subject planning application on behalf of the Shoreline Partnership. The purpose of this report is to provide an overview of the existing provision of community and social infrastructure in the Baldoyle area in order to harmonise the proposed development with the existing character of the area and create sustainable neighbourhoods.

The proposed development entails the following non-residential uses:

Use	Size (sqm)
Residential Amenity	2,301
Crèche	452
Retail / Cafe	205
Total	

Baldoyle-Stapolin, the location of this proposed development, forms part of a wider area of more recent development referred to as the North Fringe / Clongriffin-Baldoyle. The provision of the new rail station at Clongriffin, immediately adjacent this proposed development, has driven the provision of a new residential community with a range of services, facilities and educational choices. Additionally, the proposed development is proximate to the established residential areas of Baldoyle, Sutton, and Donaghmede.

The site itself lies within a larger landholding, directly to the south of the new Racecourse Park, and to the north of Growth Area 01 (which is the subject of a separate planning application), which includes the new Village Centre. The entirety of the Village Centre is proposed to be delivered under GA1 SHD application, to ensure a comprehensive design and delivery is provided in one period of development. Critically it includes linkage to Clongriffin Station, through Stapolin Square, and via the linkage north of the Square for bus, pedestrian and cycle access, and limited vehicular access. In the context of the overall Local Area Plan for Baldoyle-Stapolin, it is considered that the proposed development subject of this application, complements the phased development proposed, and the overall delivery of the LAP objectives with regards to a range of community, commercial and non-residential facilities.

Included within this Village Centre are a range of supporting services for the future population:

Use	Approx. sqm
Convenience Retail Store	915
Additional retail & café	825
Creche	539
Medical centre	462
Gym	411
Pharmacy	268
Total (approx.)	3,420

Background

Chapter 3 of the Fingal County Development Plan (2017-2023) sets out a strategy for Placemaking in the County. The Development Plan states that “*Sustainable communities are those that are economically, environmentally, and socially healthy and resilient*”.

Section 3.2 sets out the characteristics of successful and sustainable communities, including:

- *Include a range of facilities focused in a consolidated area with a critical mass of attractions and make best use of the already established investment in the built environment; these attractions include a mix of shops as well as a wide range of financial, professional and government services together with cultural, entertainment and leisure facilities.*
- *Include a thriving local residential population which adds to the vitality and vibrancy of the area as it ensures activity outside of standard retail and office opening hours.*
- *Are easily accessible by a range of transport modes including cycling and walking, have sufficient good quality short stay car parking close to the core area, have good transport linkages within the centre, and have efficient arrangements for delivery of goods.*
- *Present an attractive amenity in terms of the built environment and streetscape, streets and public spaces which are considered clean and safe, and have a sense of local identity and character, all of which greatly enhances the attraction of the centre.*
- *Have the vision and mechanisms in place to build on these existing assets, can overcome problems, adapt to both market and consumer needs and can secure appropriate and necessary improvements where required.*
- *Encourage and facilitate sustainable lifestyles and livelihoods.*

The proposed development has the potential to meet many of these characteristics, in particular through the provision of a high quality design approach to buildings, landscape, streets and open space, and to the provision of non-residential facilities, which do not detract from the adjacent Village Centre

being provided as part of GA1 proposed development, but instead work to complement the residential delivery adjacent to Racecourse Park. The development itself will be highly accessible as a result of bus and train infrastructure, but also through the provision of cycle paths and pedestrian infrastructure.

The Development Plan describes Local Centres as *usually small retail areas that serve a residential area within walking distance of these centres. Other services such as childcare and medical facilities may also be available with a limited amount of office space.*

Overview

This assessment entails an overview of the following essential community and social facilities:

- **Social / Community facilities:** community groups and clubs; general public facilities, libraries and Community centres etc. This also includes other community facilities such as Post Offices, Credit Unions, recycling centres and key retail locations.
- **Healthcare:** hospitals, General Practitioners (GPs) and Medical Centres, Pharmacies
- **Open Space and recreation:** parks, sport pitches and club facilities, playgrounds.

Community Facilities

Community Facilities are considered to include state or local authority provided services such as local authority offices, welfare services, libraries, An Garda Síochána, fire stations and other general community services.

Sustainable communities require a range of facilities and services such as state or local authority provided services such as credit unions, post offices, retail centres, recycling facilities and general community services.

The Baldoyle area possesses a range of ancillary services varying in scale including the following:

- Post offices
- Recycling facilities;
- Retail locations such as Donaghmede and Clare Hall Shopping Centres; and
- Credit unions.

Healthcare

Healthcare within the study area is provided by a range of different organisations including public, voluntary and private agencies. The Health Services Executive is the primary agency responsible for delivering health and personal social services in Ireland. In recent years, primary care has been identified as the most effective and cost-efficient way to treat patients. This offsets dependence on the hospital system allowing most patient care to take place at local, community locations which feature multi-disciplinary teams of healthcare professionals working together.

Dublin's north side is served by established healthcare facilities, with primary care and health centres proximate to the proposed development at Baldoyle, Portmarnock, Darndale, Raheny, Kilbarrack, Coolock, and the nearest large scale hospital is Beaumont Hospital located 5 km to the south west in Beaumont. In addition there is a range of GP clinics, pharmacies, and dentists in the area to address everyday needs.

Open Space and Recreation

Quality recreation, leisure and amenity facilities have a fundamental impact on the quality of life in an area. It can improve social integration and cohesiveness. Sporting, recreation and leisure activities are of primary importance to the quality of life enjoyed by residents.

The immediate area has a large range of open space areas suitable for cycling, running and walking, as well as being immediately accessible to the coast and established residential areas which contribute to this provision.

The area contains a range and diversity of open spaces. For the purposes of this study open space and recreation facilities are considered to include parks, playgrounds, multi-use games areas and sports pitches.

There are a number of publicly accessible parks within 1.5 km including Seagrang Park, Donaghmede Park, and Father Collins Park, in addition to the coastal amenity recently opened cycle and pedestrian coastal route.

The development of sport and recreation are important in encouraging a sense of well-being and social contact. Fingal County Council acknowledges the very important role that sporting and social clubs play in enhancing the social and recreational life of the city's communities. This aim is reflected in the Fingal Sports Strategy.

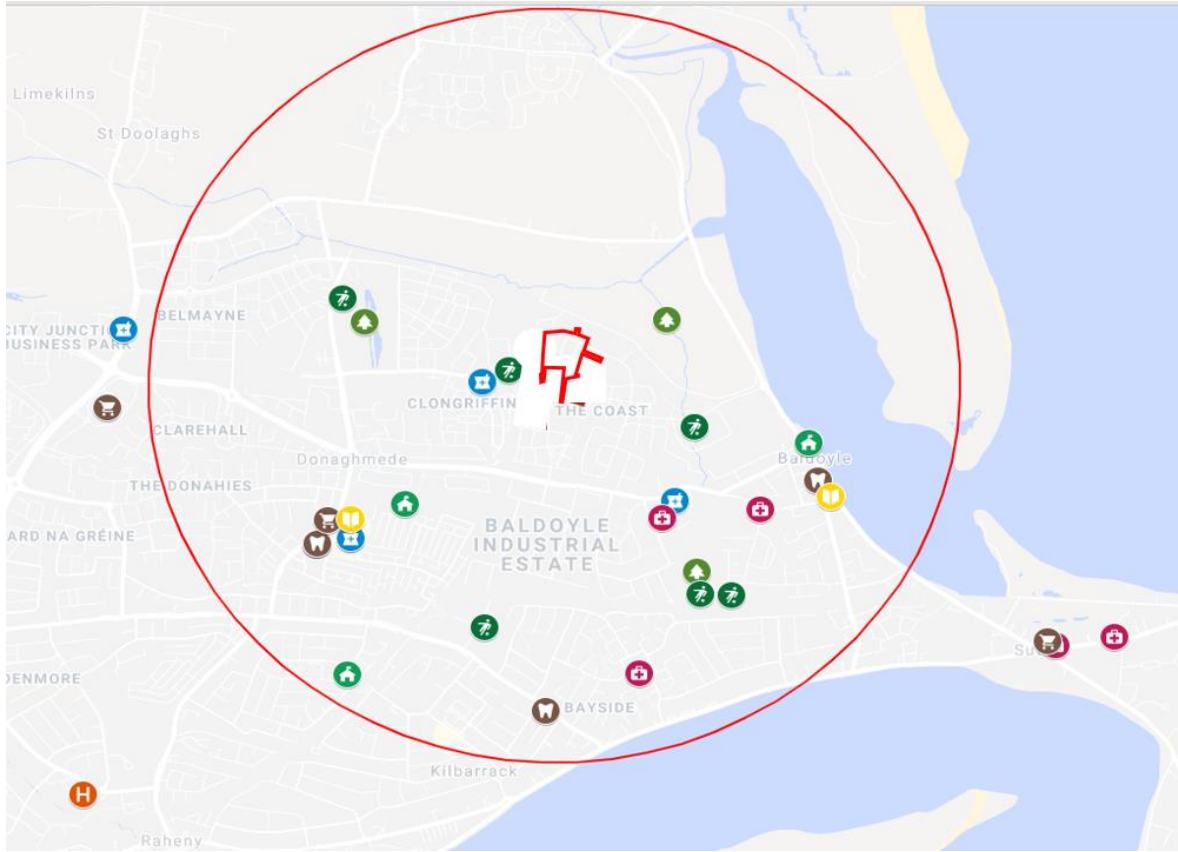












Figure 1: Overview of community facilities in the area. (Source: Google Maps, 2021.)

Post office		Dentist	
Retail locations		Hospital	
Library		Pharmacy	
Community Resource		GP / medical centre	
Leisure and recreation		Open Space	

Conclusion

The proposed development forms part of a wider strategy for Baldoyle-Stapolin, and the North Fringe / Clongriffin-Baldoyle, which provides a significant amount of supporting infrastructure to accompany residential development. Overall the wider area possesses a wide range of physical and social facilities including local retail, recreation, medical facilities, parks and open space.

We submit that the provision of community infrastructure proposed within this development, complements the range of infrastructure already provided, or planned for delivery, and will assist in creating a quality community and environment for future residents in Baldoyle-Stapolin, and will contribute to the achievement of community objectives.

APPENDIX 2: LETTER FROM FINGAL COUNTY COUNCIL



15th July 2021

**Re: Fingal County Council Commitment to develop
Racecourse Park, Baldoyle**

To Whom it May Concern,

This is to confirm that subject to the receipt of the necessary planning approvals and to the timely and legal transfer into Council ownership of those lands identified on the attached drawing No. 5610_12; Fingal County Council hereby undertakes to develop the Racecourse Regional Park, Baldoyle in line with the provisions of all related and relevant planning approvals and the requirements of the applicable Local Areas Plans (LAPs).

Kind Regards



Kevin J. Halpenny
Senior Parks Superintendent

