

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

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**Brady Shipman
Martin**

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The Shoreline Partnership

DATE

July 2021

Brady Shipman Martin

DUBLIN

Mountpleasant Business Centre
Ranelagh
Dublin 6

+353 1 208 1900

CORK

Penrose Wharf Business Centre
Penrose Wharf
Cork

+353 21 242 5620

LIMERICK

11 The Crescent
Limerick

+353 61 315 127

mail@bradyshipmanmartin.com

www.bradyshipmanmartin.com

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1 INTRODUCTION

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

The subject application site (hereafter called 'the site') is located at Baldoyle-Stapolin, Dublin 13. It is a site of approx. 6.89 hectares.

The site lies within a larger landholding, directly to the south of the new Racecourse Park, and to the north of Growth Area 1 (which is the subject of a separate planning application within the ownership of this applicant ABP 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 FCC Reg. Ref. F11A/0290 (/E1) and the Haggard Park. The site is bound by the Dublin-Belfast / DART train line and Clongriffin Station to the west.

The proposed development is predominantly residential and will provide 1,221 high-quality homes in a mix of residential types, including; studio, 1-, 2- and 3-bed units and own-door duplexes.

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

This standalone planning policy consistency statement, prepared by Brady Shipman Martin, demonstrates that the proposal is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy. It should be read in conjunction with the accompanying detailed documentation prepared by Henry J Lyons (HJL) Architects, Bernard Seymour Landscape Architects (BSLA), Brady Shipman Martin, CS Consulting Group and other design team members.

For further details of consistency with the quantitative standards for residential units as set down in the Sustainable Urban Housing: Design Standards for New Apartments (2020) and the Fingal County Development Plan, please refer to the Housing Quality Assessment and other Schedules Document prepared by HJL Architects and the Planning Report included in this SHD Planning Application.

2 CONSISTENCY WITH PLANNING POLICY

2.1 National and Regional Planning Policy

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

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

2.1.1 Rebuilding Ireland – Action Plan for Housing and Homelessness

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

The Plan contains five key pillars:

- Pillar 1 – Address Homelessness: Provide early solutions to address the unacceptable level of families in emergency accommodation; deliver inter-agency supports for people who are currently homeless, with a

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particular emphasis on minimising the incidence of rough sleeping, and enhance State supports to keep people in their own homes.

- Pillar 2 – Accelerate Social Housing: Increase the level and speed of delivery of social housing and other State-supported housing.
- Pillar 3 – Build More Homes: Increase the output of private housing to meet demand at affordable prices.
- Pillar 4 – Improve the Rental Sector: Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.
- Pillar 5 – Utilise Existing Housing: Ensure that existing housing stock is used to the maximum degree possible - focusing on measures to use vacant stock to renew urban and rural areas.

The proposed development at Baldoyle is consistent with Pillar 3 and Pillar 4 as the scheme is proposing to construct 1,221 no. apartments on a highly accessible site location within the North fringes of Dublin City. The scheme also provides for 120 no. Part V social housing units.

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

In respect of Baldoyle – Stapolin the LIHAF description states:

*This is a **Major Urban Housing Development Site**. This proposal includes four elements and will release lands identified in the Baldoyle Local Area Plan 2013 for the delivery of approximately 800 residential units. The proposal includes a Ramp to provide pedestrian and cyclist access to Clongriffin Train Station & attenuation areas (constructed wetland), a regional park and a 'Hole in Wall' staggered junction upgrade works which facilitates the full delivery potential for housing in the Stapolin LAP lands, Portmarnock LAP lands and wider North City Fringe area.*

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

The proposed public infrastructure included in this funding include key elements of the permitted development under GA01 Lands and will also serve the proposed GA03 Lands. It is considered that the increased density and delivery of units further optimised this LIHAF investment by the Government.

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

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

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

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

Project Ireland 2040 contains two key plans: the National Planning Framework (NPF); and the National Development Plan Framework (NDP) which, in tandem, set out infrastructure priorities and plan regional development for the country. The NPF is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

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

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

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

National Policy Objective 4 in this regards states:

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

National Policy Objective 11 in this regards states:

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 13 in this regards states:

In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

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

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

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

The Strategy identifies that the region *'is home to over 800,000 households, with 4 out of 5 living in conventional housing while apartments account for around 18% of our housing stock. One of the challenges facing the region is the continued growth rates of household formation coupled with a severe slowdown in the*

development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the region’.

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

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

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

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

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

The NPF also sets out ambitious targets to achieve compact growth with 50% of housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. To achieve this *‘the MASP identifies strategic residential and employment corridors along key public transport corridors existing and planned,*

that contain development opportunities. These include; ... large scale urban expansion on the North Fringe of the city...'

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

Policy Objective relating to Housing Delivery include:

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

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

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

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

These qualitative standards have been brought through in the Design Manual as referenced above, the 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 underutilised and undeveloped site is located adjacent an existing DART station, bus route, and will be serviced by an upgraded Bus Connects route.

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

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

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

Context: How does the development respond to its surroundings?

The proposed development has been designed to respond positively to the existing established, and permitted residential communities in the area which comprise a wide mix of housing types. To the west, existing and permitted residential development in Clongriffin primarily includes newer apartment developments. 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 an upgraded Busconnects route (Core Bus Corridor Route No. 1¹).

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.

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

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 in both apartments and duplex typologies.

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 greenfield 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. 2,803, 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, through own door, duplex and commercial uses, 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 and amenity zones are located at ground floor to lend activity, animation and passive surveillance to streets and shared spaces.

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 ground floor level 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 c.4.99 ha 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.

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

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

The Guidelines note that the NPF projects a need for a minimum of 550,000 new homes, at least half of which are targeted for provision in Ireland's five cities and of particular relevance to this site it notes a shift in Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to where jobs and services are located, which requires at least half of new homes within Ireland's cities to be provided within the current built-up area of each, i.e. on sites within the existing urban 'envelope'.

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

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

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

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

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

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

Another key update in the 2018 Guidelines is the ability to reduce car parking standards. The Guidelines identify that *'in larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances'*.

The scheme as proposed includes for car parking at a rate of 0.55 per unit which is justified given the site's accessibility to public transport and employment zones.

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

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

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

particularly those served by good public transport and supporting services, including employment opportunities’.

The Guidelines reference NPO 13 (from the NPF) which states that *‘in urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected’.*

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

The proposed scheme, as set out in this SHD Planning Application seeks to achieve greater height and density. The site’s suitability for this approach is set out in detail, as considered against the Guidelines in the accompanying Planning Report. It is considered that, the subject site, it is submitted, is a good example of a site which that can achieve increased building height and resulting increased density, on a highly accessible site within the consolidated urban area of Dublin City.

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

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

The scheme proposals are the outcome of an integrated urban design and landscaping to create lower traffic speeds through the development and thereby facilitating a safer environment for pedestrians and cyclists. CS Consulting Group along with the rest of the design team have interrogated the DMURS principles to ensure the final layout provides a high quality urban extension in proximity to the Clongriffin train station.

2.1.9 Guidelines for Planning Authorities on Childcare Facilities (2001)

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

'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 41.3% studios and one beds 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.

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

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

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

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

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

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

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

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

2.1.11 Transport Strategy for the Greater Dublin Area 2016 – 2035

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

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

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

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

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

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

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

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

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

2.1.13 Birds and Habitats Directive – Appropriate Assessment

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

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

We refer An Bord Pleanála to the Appropriate Assessment Screening Report and Natura Impact Assessment Report prepared by Altemaar that accompanies this application.

2.1.14 EIA Directive

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

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

2.2 Local Planning Policy

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

2.2.1 Fingal County Development Plan 2017 - 2023.

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.

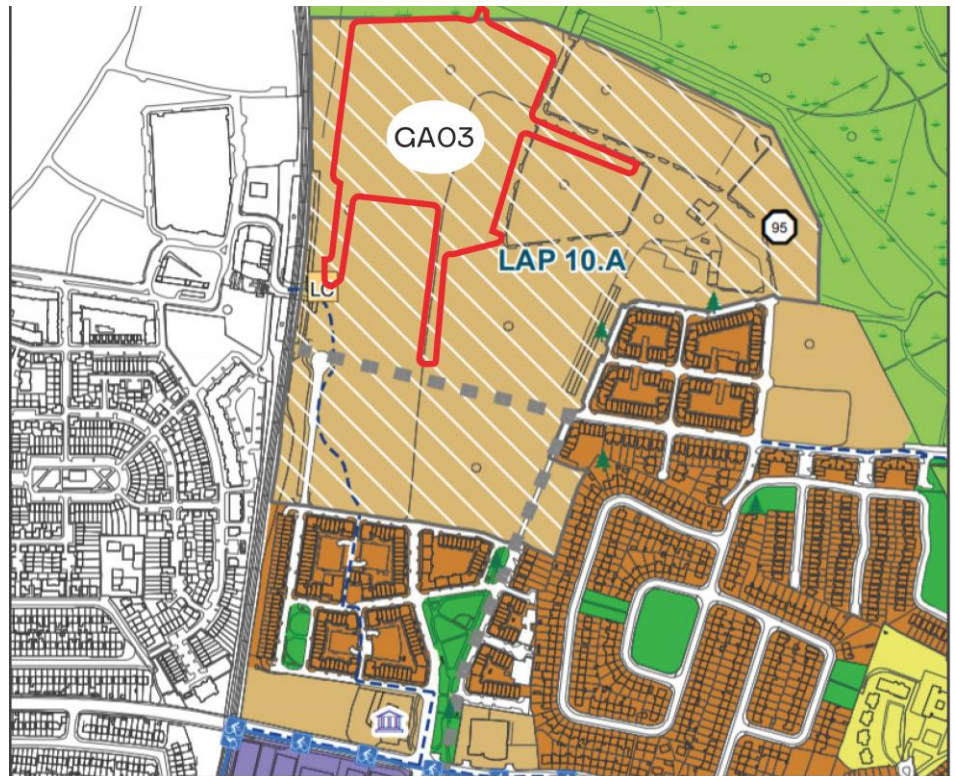







Figure 2.1: extract from the Fingal Development Plan Zoning Map 10 (Source: FCC, 2019).

 HA – High Amenity	Protect and enhance high amenity areas
 RA – Residential Area	Provide for new residential communities subject to the provision of the necessary social and physical infrastructure
Local Objective 95	Ensure that the visual impact of any development on the Greenbelt will be minimised by its siting, design and planting
'LC'	Provide for a Local Centre
	Greater Dublin Area Cycle Network ('Feeder Network')
	Road Proposal
	Protect & Preserve Trees, Woodlands and Hedgerows

The following uses are considered permitted in principle:

Amusement Arcade Bed and Breakfast Betting Office* Childcare Facilities
Community Facility Education Funeral Home/Mortuary* Guest House Health
Centre Health Practitioner Hospital Office Ancillary to Permitted Use Office ≤
100sqm* Office > 100sqm and < 1,000sqm11 Open Space Place of Worship
Public House* Public Transport Station Recreational Facility/Sports Club
Residential, Residential Care Home/ Retirement Home Restaurant/Café* Retail
- Local < 150 sqm nfa Retail - Convenience ≤ 500 sqm nfa* Retail - Comparison
≤ 500 sqm nfa* Retail - Supermarket ≤ 2,500 sqm nfa* Retirement Village*

*Sheltered Accommodation Sustainable Energy Installation Taxi Office Traveller
Community Accommodation Utility Installations Veterinary Clinic*

* In a local centre only

Core Strategy

Chapter 2 of the Development Plan sets out the Core Strategy and Settlement Strategy for 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 2² 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.

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).

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

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.. This is further set out in the Material Contravention Statement accompanying this Planning Application.

Place Making

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

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

The proposed development will contribute to the achievement of the wider objectives of Chapter 3 through a variety of ways. Specifically through the delivery of a high quality residential scheme with a variety of uses to meet the

future resident's needs; and, carefully considered private, communal and public open spaces.

Place-making is a central tenet of the approach to the proposed development at Baldoyle-Stapolin. In seeking to establish a sense of place and community from the outset, 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'*. This proposed development seeks to harness the area's particular character and attributes, to create a quality and sustainable living environment. This Study will be more fully embedded in the design development process as the proposal evolves.

Housing Strategy

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

The provision of a mix and range of housing types is essential to accommodate the housing needs and expectations of the County's residents. Mixed and inclusive communities, which offer a choice of housing and lifestyles, have been proven to provide a number of community benefits.

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

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

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

The following general objectives relate the residential development in Fingal:

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

The proposed residential development proposes a suitable density of 178 units per ha to optimise use of the lands which are zoned and highly accessible. The lands are also adjacent to emerging and recently developed urban areas. It is submitted that the proposed development is consistent with the objectives and vision of Fingal County Development Plan Core and Housing Strategies, therefore ensuring consistency with National and Regional policy.

Energy Efficiency and Climate Change

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

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

Part V – Social Housing

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

Natural Heritage and Landscape Considerations

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

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

The Development Plan considers the subject lands as ‘Estuary Character Type’ which has a high sensitivity to development and exceptional value. The Baldoyle Estuary is one of three large sand spits which are have protected estuarine and saltmarsh habitats of ornithological and ecological interest. Baldoyle is also a designated Natura 2000 Site (Special Protection Areas and Special Areas of Conservation), Natural Heritage Area and Ramsar site.

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

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

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

The proposed development has considered the above issues at an early stage in the development process. This Planning Application includes all necessary assessments in relation to ecology, Appropriate Assessment, Environmental

Impact Assessment, visual impact assessments resulting in a high standards of siting and design.

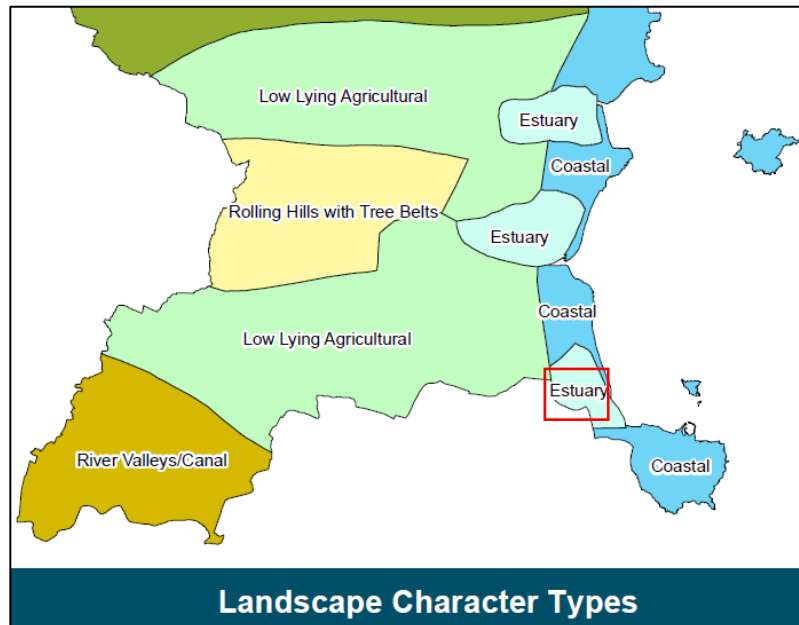


Figure 2.2: Extract from the Fingal Development Plan Green Infrastructure Map 14 (Source: FCC, 2019).

Common Principles for all Planning Applications

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

Environmental Assessment

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

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

Design Criteria for Residential Development

The proposed development complies with the following design criteria:

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

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

2.2.2 Baldoyle-Stapolin LAP 2013-2023

Adopted in May 2013 by FCC, the County Council Members, having considered the Chief Executive's Report at a Council meeting on the 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 2023.³

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

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

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

Zoning and Objectives

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

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

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



Figure 2.3: Baldoyle Stapolin LAP map. (Source: FCC, 2020.)

We note the LAP sets out the following objectives for the lands, none of which are directly pertinent to the subject site:

Map Based Objectives

1. Facilitate and encourage community facilities which allow for shared and multi-purpose use and adaptability within the village centre, or for non-commercial or small scale community facilities other agreed locations may be considered subject to demand and resources.
2. Provide for at least one crèche facility within the village centre area as part of the phasing requirements set out in Section 6 and as required by Section 4E of the Local Area Plan
3. Require high quality design and finish to any development at these important gateway nodes to the LAP lands
4. Provide for a public park and sensitively designed retirement village subject to screening for assessment under the Habitats Directive as per Local Objective 469 in the 2011-2017 Fingal Development Plan or as may be revised in any future Development Plan
5. Ensure that key services such as local and primary health care facilities, public house, and crèche are provided within the village centre to ensure the appropriate mix of community services and facilities, the vitality of the village centre, and to encourage the use of sustainable modes of transport.
6. Facilitate an alternative site readily accessible from Grange Road for a medical/primary care centre, in line with HSE requirements. Such a site should only be considered where it can be demonstrated that a medical/primary care centre cannot be delivered in the village centre within a

reasonable timeframe (not to exceed 3 years from date of adoption of this LAP).

- 7. Facilitate the provision of changing facilities for clubs and teams using the pitches in Racecourse Park and meeting space for community use within this existing building without any undue delay.*
- 8. Facilitate an alternative site to the Grange Road site for an urban type school as part of the village centre's mixed use development on the northern section of the village centre, subject to the requirement for such being indicated by the Department of Education and Skills within the next Capital Programme for Schools (i.e. the successor document to the 2012-2016 Capital Investment Programme for Schools).*
- 9. Provide for a Multi Use Games Area (MUGA) or a small all-weather training facility similar in scale to a MUGA in the vicinity of the changing rooms at the existing active recreational facilities within Racecourse Park subject to screening for Appropriate Assessment.*

(Our emphasis.)

The proposed development provides extensive tenant amenity to serve the future population.

Vision, Themes and Objectives

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

The LAP sets out 3 development themes with corresponding objectives:

- 1. **Sustainable Development** - the creation of an urban area with buildings and surrounding areas constructed to high standards of sustainable design, accessible good quality public transport, green spaces and corridors and strong inclusive communities.*
- 2. **High Quality Places for All** - the development of interesting, exciting and stimulating buildings and public spaces, which make the most of natural features and are well connected to surrounding areas.*
- 3. **A New Heart for Baldoyle-Stapolin**- the development of a new mixed use local centre and public realm in which people want to live, work and invest.*
- 4. **Homes for the Future** – the creation of well designed sustainable adaptable homes and neighbourhoods, which cater for a wide range of households.*

The development, and the wider lands layouts, has been laid out to provide generous spaces between blocks, allowing streets and public spaces to breathe.

These streets and public spaces are richly landscaped to soften the urban realm and ground the development in its nature setting.

The primary boulevards of Longfield Road and Stapolin Way have been designed to allow for layering of landscape buffer elements between carriageways and footpaths. These streets, with tree lined footpaths, provide a comfortable experience for pedestrians moving through the site.

The community park at the heart of the scheme is provided with generous dimensions, accessed from multiple points and visible throughout the masterplan. This brings a real sense of the Green Artery running through the centre of the site, providing a connection between all public spaces within the site.

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

Green Infrastructure

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

The proposed development proposes c.4.99 ha of public open space, meeting and exceeding FCC requirements on public open space provision. 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.

SHORELINE GA03 BALDOYLE SHD

Statement of Consistency

Please see HJL Design Statement, Section 4, for further detail in relation to the proposed development.

Housing Mix

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

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

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

The proposed development provides a wide range of unit sizes and types, catering for a broad section of the population. We submit that the proposed development, in terms of unit mix, is consistent with the national policy including the Sustainable Urban Housing Design Standards for New Apartments. Please see enclosed Statement of Material Contravention prepared by BSM for full detail and rationale for the contravention in respect of unit mix.

Density

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 2.4: Baldoye 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.

The additional height is appropriately located on the site with taller blocks located adjacent to the rail line and Racecourse Park, in line with the LAP. The height of the north-south blocks in Zone G have been emphasised and the east-west ranges have been kept low to promote views out over the Racecourse Park.

The taller Blocks (G1-G5) to the north comprise primarily heights of 5-10 storeys with 1 No block of 7- 15 No. storeys. While Blocks F1 and F2 comprise 2 – 6 storeys in response to adjacent proposed and permitted development. Blocks E1 to E4 provide an appropriate response to the proposed Community Park, and transition from the proposed development to the south as part of GA1.

Proposed heights have been set to relate well to each other and their surroundings, and to provide a sense of enclosure to residential streets.

As a result the proposed development exceeds the provisions of the LAP. The emphasis of the Fingal Development Plan is to continue to consolidate the existing zoned lands and to maximise the efficient use of existing and proposed infrastructure. In this way the Council can ensure an integrated land use and transport strategy in line with national and regional policy.

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

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

Phasing and Infrastructure

The LAP identifies three growth areas to facilitate the phasing of the development. The proposed development is located within GA3.

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

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

In specific relation to 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.

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Statement of Consistency

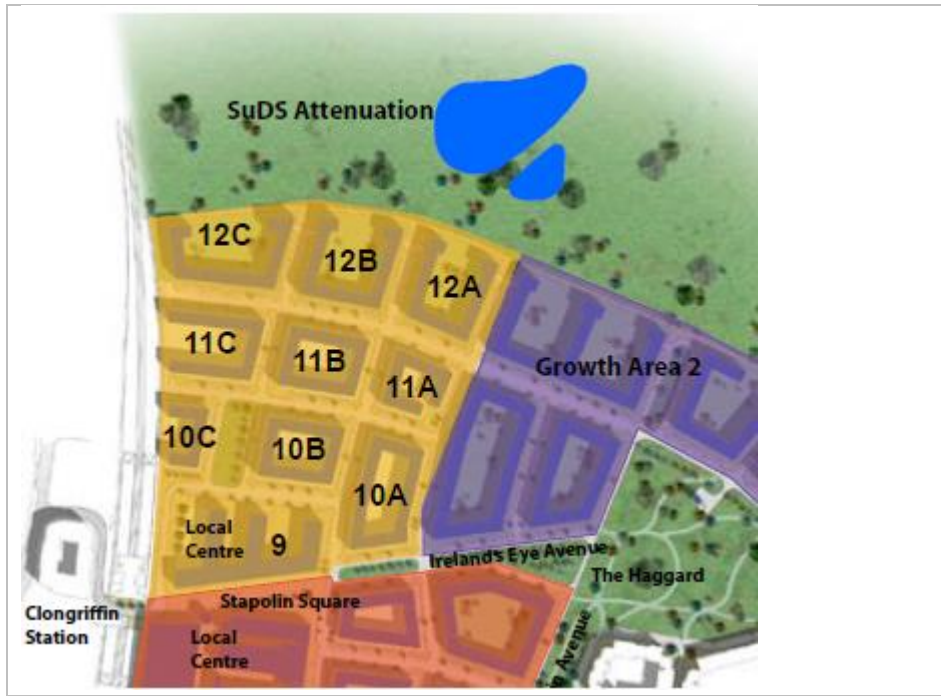


Table 6.10 – 6.14 sets out phasing and infrastructure requirements including:

- Roads
- Open Space
- Village Centre
- Community Facilities
- Undeveloped / Interim sites

The proposed development in combination with the proposed development at GA1 meets the requirements for infrastructure on the LAP lands. The Village Centre is proposed for delivery within the GA1 application (currently at Pre-application stage). This GA3 application overlaps with the area subject of the GA1 application in the proposed delivery of the bus/vehicular access route to Clongriffin Station, to the north of the village centre. Therefore this application pertaining to GA3, will continue development north of the village centre. Contained within this application are key open spaces, crèche and roads.

3 CONCLUSION

The statement set out herein demonstrates the consistency of the proposed development with the relevant national, regional and local planning policy context. This is considered in the context of the Material Contravention Statement which accompanies the application.

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

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

It is respectfully submitted that the proposed development will provide an appropriate form of high quality residential development for this under-utilised site. This Statement of Consistency, accompanying the Planning Application, demonstrates that the proposed development is consistent with the national, regional and local planning policy framework, and that the proposal will provide for an effective and efficient use of this highly accessible site.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines and that the proposal as presented constitutes a reasonable basis for an application.