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Prepared by CWPA Planning & Architecture

CWPA

Planning & Architecture



Planning Report & Statement of Consistency

120 no. bed Large Scale Residential Development (LRD).

Lands at Baldoyle, Dublin 13.

Submission to Fingal County Council on behalf of Rondesere Ltd.

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Quality Assurance – Mandate Statute

This document has been prepared and scrutinised in accordance with CWPA Planning & Architecture Quality Assurance team provisions.

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Application Information:

Applicant: Rondesere Ltd.
Planning Authority: Fingal County Council
RE: Construction of a 120 no. bed Large Scale Residential Development (LRD).
Subject Site: Lands at Baldoyle, Dublin 13.
Prepared By: CWPA Planning & Architecture.

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1.0 Introduction

CWPA Planning and Architecture, Unit 10, North Street Business Park, Townparks, Seatown West, Swords, Co. Dublin, K67 C992, has prepared this Planning Report and Statement of Consistency in relation to the proposed Large Residential Development (LRD) , on behalf of Rondesere Ltd. The planning application for the development of 120 no. apartments on lands located to at Grange Road, Baldoyle, Dublin 13. The proposed development consists of the following;

"1. Demolition of existing, single storey, storage structures on the subject site (c. 446.5 m² GFA).

2. The construction of a residential development comprising of 120 no. apartment units (15 no. studio units, 18 no. 1 bed units, 78 no. 2 bed units, 7 no. 3 bed units, 2 no. 4 bed penthouse units) within 1 no. block (ranging in height from 4 - 12 storeys over basement level).

3. The construction of a basement to be accessed off Myrtle Road and the provision of c. 47 no. car parking spaces, including accessible spaces, electric vehicle charging points, residential visitor parking and associated commercial parking. Add - 2 no. drop off/creche parking on surface.

4. Provision of 326 no. bicycle parking spaces for residents, visitors, and commercial uses in secure locations both at basement level and within the public realm throughout the scheme. Add - 60 (out of 326) are visitor parking on surface.

5. All apartments are provided with private terraces / balconies.

6. Provision of c. 1877 m² of Communal Open Space to serve the development including green roof garden terraces between 5th and 10th floor level.

7. Provision of a childcare facility at ground floor level (c. 156.6 m² GFA) with capacity in the order of 35 no. children and associated, secure, open play area (c. 117.1 m²).

8. Provision of Café unit (c. 70 m² GFA) at ground floor level with associated outdoor seating area.

9. Provision of associated gymnasium at ground and first floor level (c. 280 m²).

10. Provision of Multipurpose Room (c. 48 m² GFA) and Residents Lounge (c. 20 m²) at first floor level.

11. Total non-residential use is c. 574.6 m² (3.85 % of overall development).

12. The development will also provide for all associated ancillary site development infrastructure including: ESB sub-station, bike stores, bin stores, plant rooms, public

lighting, new watermain connection and foul and surface water drainage; internal roads & footpaths; site landscaping, including boundary treatments; associated scheme signage, and all associated site development and excavation works above and below ground necessary to facilitate the development."

This planning document addresses the consistency of the proposed development with all relevant national, regional, county and local planning policy and guidance documents.

This planning report should be read in conjunction with the planning application drawings prepared by CWPA, the associated Design Report prepared by CWPA which consists of a '*Height Statement*' as part of the justification for the proposed development and all other plans and particulars submitted as part of this planning application.

2.0 Site Location and Description

The subject site extends to approx. 0.45 hectares and is located on lands at Grange Road, Baldoyle, Dublin 13.

The site is bounded to the north by an existing residential development (Myrtle Rod), by Grange Road to the south separating the subject site with Baldoyle Industrial Estate, by Longfield Road and Beshoff Motors Car Dealers to the east and an educational facility currently under construction on lands adjoining the west of the subject site.

The subject site is located in close proximity to Clongriffin Station, a high frequency public railway station providing direct connection into Dublin City and onwards to the wider Dublin area. In addition, the site benefits from being serviced with high frequency public bus network services. Please refer to Waterman Moylan's Engineering Assessment Report for further information.

3.0 Planning History

3.1 Subject Site Planning History.

According to Fingal County Council's planning portal the planning history for the subject site is as follows:

Reg Ref: F05A/1799

Location: Grange And Stapolin Townlands, Grange Road, Baldoyle, Dublin 13.

Development Description: *The development will consist of a mixed residential and retail/commercial development, in a 6 and 7-storey over basement level building. The basement level contains parking and service areas. The ground floor contains retail/commercial units, a service yard and parking including 7 No. retail/commercial units and a coffee shop. The first floor contains apartments and a podium level communal open space. Apartments are located above on floors 2, 3, 4 and 5, with a penthouse 6th floor level including apartments and communal roof gardens. Each apartment is provided with either a balcony or a combination of both balcony and terrace. The apartments (65 No.) are made up of: 21 no. 1 bed apartments, 36 no. 2 bed apartments and 8 no. 3 bed apartments. The development shall also include vehicular access onto Grange Road at the permitted cross-roads junction at Grange Rise (Ref. No. F02A/1525). Provision is made for, 98 car parking spaces, of which 66 are to be contained within a basement level car park and 32 at ground level, bicycle parking, service yard, internal service stairwells and lift access, ESB sub-station and all associated site development works and services.*

Decision: Withdrawn Application.

3.2 Adjoining Sites Planning History.

- Reg. Ref. 310418-21

Development Description: *Alterations of previously permitted Fingal County Council Register Reference number F16A/0412 (An Bord Pleanála Reference Number PL06F.248970) as amended by F20A/0258 and F221A0046) for 882 no. residential units (135 no. houses and 747 no. apartments), creche and associated site works.*

Decision: Grant Permission.

Decision Date: 22/09/2021

- Reg. Ref. LRD0015/S3

Alterations were made to Reg. Ref. 310418-21 under Reg. Ref. LRD0015/S3, resulting in a reduction in height to various previously approved apartment blocks.

Description: *The proposed development seeks to amend permitted SHD under ABP Reg. Ref. 310418 resulting in an overall reduction of 55 no. units from 882 (as permitted) to 827 no. units (as proposed) within GA1 lands.*

** Reduction in building height of Block A1 from an 8-6 no. storey building (as permitted) to a 7-6 no. storey building.*

** Reduction in building height of Block D1 from an 9-6 no. storey building (as permitted) to a 7-6 no. storey building.*

** Reduction in building height of Block D2 from an 8-6 no. storey building (as permitted) to a 7-6 no. storey building.*

** Reduction in building height of Block D3 from an 15-5 no. storey building (as permitted) to a 10-5 no. storey building.*

Decision: Granted.

Decision Date: 29/05/2023.

- Reg Ref: 311016-21

Development Description: 1,221 no. apartments, creche and associated site works.

Decision: Granted With Conditions.

Decision Date: 23/11/2021.

- Reg. Ref. LRD0016/S3

Alterations were made to Reg Ref: 311016-21 under Reg. Ref. LRD0016/S3, resulting in a reduction in height to various previously approved apartment blocks.

Description: *The proposed development seeks to amend the SHD permitted under ABP Reg. Ref. 311016 resulting in an overall reduction of 97 no. units from 1,221 (as permitted) to 1,124 no. units (as proposed) within GA3 land.*

* Block G1 - reduction in height from 10-4 no. storey building (as permitted) to 7-4 no storey building.

* Block G2 - reduction in height from 10-4 no. storey building (as permitted) to 7-4 no. storey building.

* Block G3 - reduction in height from 15-7 no. storey building (as permitted) to 10-6 no. storey building.

* Block G5 - reduction in height from 10-4 no. storey building (as permitted) to 7-4 no. storey building.

* Block E1 - reduction in height from 8-5 no. storey building (as permitted) to 7-5 no. storey building.

Decision: Granted with Conditions.

Decision Date: 25/05/2023.

- Reg Ref: 313222-22

Development Description: *1,007 no. apartments, creche and associated site works.*

Decision: Refused.

Decision Date: 16/03/2023.

Similar developments to the proposed, are as follows:

- Reg. Ref: LRD0001/S3

Description: Large-scale Residential Development comprises the construction of a mixed use development, consisting of 971 no. apartments (comprising 117 no. studio apartments, 368 no. 1 bed apartments, 422 no. 2 bed apartments, and 64 no. 3 bed apartments) in 7 no. buildings (Blocks A, B, C, D, E, F, and G) ranging from 1 no. to 16 no. storeys in height, over a basement level (below 6 no. of the blocks), and provision of a Mobility Hub, with 7 no. levels. The development includes 7 no. commercial units (for Class 1- Shop, or Class 2- Office / Professional Services, or Class 11 Gym, or Restaurant / Café use, including ancillary takeaway use) in Blocks A, C, G and the Mobility Hub, 1 no. Community Facility and 1 no. Place of Worship in the Mobility Hub, 1 no. Childcare Facility in Block A, and ancillary resident amenity floorspace to serve the residential units (in Blocks A, B, D, E and F).

Decision: Granted by Fingal County Council and Granted at Appeal by An Bord Pleanála.

Decision Date: Final - 26/05/2023.

- Reg. Ref: 305316-19

Description: 916 no. apartments including the loss of 114 units (238 no. residential, 678 no. Build to Rent units), 2 no. creches, 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.

Decision: Granted with Conditions by ABP

Decision Date: 13/12/2019

- Reg Ref: 305319-19

Description: 500 no apartments (235 no. residential, 265 no. Build to Rent). Creche and all associated site works in block of 2 – 8 storeys.

Decision: Granted with Condition by ABP.

Decision Date: 13/12/2019.

3.3 Planning History Conclusion

The planning history in the surrounding area consists of a number of significant planning applications spanning across the administrative jurisdictions of both Fingal County Council and Dublin City Council. These approved planning applications demonstrate that future development in the vicinity of the subject site will be largely characterised by compact, consolidated and high density development with apartment blocks ranging in height from 6 – 17 storeys. All future development will benefit from existing infrastructure and high frequency public transport accessibility.

Specifically, 1 no. 17 storey apartment block will be located c. 490 m from the subject site, approved under Reg. Ref. 305316. An additional 15 no. storey apartment block approved under the same application will be located c. 460 m to the north of Clongriffin Dart Station, an equal distance from which the subject site and proposed development is located to the south. Having regard for the recent LRD approvals by Fingal County Council under Reg. Ref. LRD0015/S3 and Reg. Ref. LRD0016/S3, 2 no. 10 storey apartment blocks are set to be constructed c. 516 m and c. 830 m from the subject site respectively. These developments will be surrounded by additional apartment blocks ranging in height from 6 – 7 storeys. However, it is understood that the previous SHD approvals are still at Judicial Review stage and if an outcome is reached in favour of the applicant, these 10 storey apartment blocks may both be constructed at 15 storeys as originally approved under the SHD process.

An additional Large-scale Residential Development has been afforded careful consideration in Blanchardstown under Reg. Ref. LRD0001/S3 where 971 no. apartments have recently been approved by Fingal County Council in 7 no. buildings ranging in height from 1 no. to 16 no. storeys together with supporting commercial development, generating a net residential density of 303 units per hectare. The nature and content of the proposed development has been in part informed by the planning history above, amongst various additional considerations including the statutory planning policy context pertaining to the site and the character of the sites immediate context.

4.0 Proposed Development

Please find below, tables of the proposed development summary, containing unit mix, amenities and open space provisions.

Table 1: Development Summary

DEVELOPMENT SUMMARY

Site Area	1.12 Acres
Total Residential Units	120 units
Density	266.6 u/ha
Plot Ratio	3.29
Site Coverage	1413.53 sqm
Total Development Area	14917.53 sqm
Residential Car Parking	49 no.
Residential Bike Parking Provision	326 no.
Resident Amenities	574.6 sqm

UNIT MIX

Studio	15	12.5 %
1-Bed	18	15 %
2-Bed	78	65 %
3-Bed	7	5.8 %
4 Bed Penthouse	2	1.7 %
Dual Aspect Ratio	58	48 %
Part V Contribution	12	10 %

AMENITIES

Creche	156.6 sqm
Gym	280 sqm
Café	70 sqm
Lounge	20 sqm
Multipurpose Room	48 sqm

OPEN SPACE PROVISIONS

Communal Green Open Space	1877 sqm
Communal Green Courtyard Space	856.61 sqm

5.0 Statement of Consistency

The key policy and guidance documents of relevance to the proposed development are as follows:

- *Housing for All – A New Housing Plan for Ireland (2021);*
- *Project Ireland 2040 – National Planning Framework (2018);*
- *Eastern and Midland Regional Assembly – Regional Spatial & Economic Strategy 2019-2031 (RSES) (2019);*
- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, and the accompanying Urban Design Manual (2009);*
- *Sustainable Urban Housing: Design Standards for New Apartments (2022)*
- *Design Manual for Urban Roads and Streets (2019)*
- *Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)*
- *Guidelines for Planning Authorities on Childcare Facilities (2001);*

5.1 Housing for All – A New Housing Plan for Ireland (2021)

The main aim for Housing For All plan is that *“Everyone in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life”* (p.17). With a view to achieving this aim, the plan sets out four overarching housing policy objectives:

- *Supporting homeownerships and increasing affordability;*
- *Eradicating homelessness, increasing social housing delivery and supporting social inclusion.*
- *Increasing new housing supply; and*
- *Addressing vacancy and efficient use of existing stock.*

The plan ensures that new housing is delivered sustainably, with greater proportion of residential development in the existing built-up footprint of towns and cities, and all new homes being built to Nearly Zero Energy Building (NZEB) standards, as well as a policy of retrofitting existing housing stock.

With a view to support sustainable communities *“places where people want to live and work”*, the plan states commitment *“to continuing the policy of having mixed tenure communities,*

including through the mechanism of Part V of the planning and Development Act 2000, to ensure that social and affordable housing are part of the mix across housing developments", p122.

The proposed development provides a significant amount of housing to increase the housing supply within Baldoyle and deliver a diverse housing type that is currently under demand in the area on lands zoned for residential development in accordance with Government housing policy and includes a Part V proposal.

5.2 Project Ireland 2040 – National Planning Framework.

Project Ireland 2040 contains two key plans – The National Planning Framework and the National Development Plan Framework, which together have set out 10 aims:

- *Compact Growth*
- *Enhanced Regional Accessibility*
- *Strengthen Rural Economies and Communities*
- *Sustainable Mobility*
- *A Strong Economy, supported by Enterprise, Innovation and Skills.*
- *High Quality International Connectivity*
- *Enhanced Amenity and Heritage*
- *Transition to a Low Carbon and Climate Resilient Society*
- *Sustainable Management of Water and other Environment Resources/*
- *Access to Quality Childcare, Education and Health Services.*

An NPF key objective relates to compact growth. The plan manages the sustainable growth of compact cities, town, villages and to add value and create more attractive areas for people to live and work.

The NPF states that the city needs to *'accommodate a greater portion of the growth it generates within its metropolitan boundaries and to offer improved housing choice'*.

National Policy Objective 2a - A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.

National Policy Objective 3a - Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

National Policy Objective 3c- Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.

National Policy Objective 4 – *‘Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*

National Policy Objective 11 – *‘In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, town, and villages, subject to development meeting appropriate planning standards and achieving targeted growth’.*

National Policy Objective 13 – *‘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 e proposed to achieve stated outcomes, provide4d public safety is not compromised and the environment is suitable protected’.*

The National Planning Framework requires housing to be located in areas that support sustainable development. These areas must be accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change.

The subject site fully complies with the NPF because of its location, which is in an area like Baldoyle and next to Clongriffen, both of which provide employment opportunities and services to the local population. The proposed development is near Clongriffen Train Station providing frequent connectivity links to Dublin City Centre through DART services via the main Dublin-Belfast railway line.

The proposed development is consistent with the NPO’s within the NPF and will contribute to a high-quality residential development within the Dublin Metropolitan area.

5.3 Eastern and Midland Regional Assembly – Regional Spatial & Economic Strategy 2019 – 2031.

The RSES is based on three key principles:

Healthy Place making: To promote people’s quality of life through the creation of healthy and attractive places to live.

Climate Action: The need to enhance climate resilience and to accelerate a transition to a low carbon economy recognising the role of natural capital and ecosystems in achieving this.

Economic opportunity: to create the right conditions and opportunities for the region to realise sustained economic growth and employment that ensures good living standards for all.

In accordance with the NPF, the RSES contains a Metropolitan Area Strategic Plan (MASP) for the Dublin Metropolitan Area (DMA), which contains the location of the proposed development. The vision statement for the DMA is to *'build on our strengths to become a smart, climate resilient and global city region, expanding access to social and economic opportunities and improved housing choice, travel options and quality of life for people who live, work, study in or visit the metropolitan area'*.

Regarding the development, the MASP notes Baldoyle within the northern fringe with an overall aim for *'large scale urban expansion creating new communities at Clongriffin-Belmayne (Dublin City) and Baldoyle- Stapolin (Fingal)'*. In the short term, the MASP states that access to the rail station, bus upgrades, new road connections, drainage, parks, and social infrastructure as phasing/ enabling infrastructure.

The MASP focuses on housing delivery along high-quality, existing and planned, transport corridors, that have capacity to accommodate significant development in an integrated and sustainable fashion. These include the *'North-South Corridor Dart Expansion'* which is identified as having a potential long-term population capacity of 51,000:

"The DART Expansion Programme, to be delivered by 2027 will increase capacity on the northern commuter line and support large-scale residential development at Baldoyle, including access to rail station, bus upgrades, new road connections, drainage and social infrastructure".

Baldoyle-Stapolin is located within the Northern Fringe with an overall aim for large-scale expansion. The MASP identifies enabling infrastructure needed to support large-scale residential developments, which includes access to rail stations, bus upgrades, new road connections, drainage, parks and social infrastructure.

Policy objectives relating to the 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'*.

The proposed development is consistent with the RSES and the MASP in that it will contribute to delivering high-quality residential development in an area explicitly earmarked for this

purpose. Strategically located with regard to transport connections and connectivity to the rest of the county.

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

The '*Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities 2009*' are designed to assist Planning Authorities, developers, architects and designers in delivering quality residential development. The Guidelines are provided jointly with the accompanying Urban Design Manual - A Best Practice Guide (2009).

This location would be deemed appropriate as the Guidelines suggest that the city and town centres offer "*the greatest potential for the creation of sustainable patterns of development*" and how brownfield sites should be promoted.

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

The Urban Design Manual is based around 12 Criteria that have been created to provide a list of considerations for residential development. They are a concentration of the current policy of quality urban design. The following points will discuss the proposed designs compliance with the 12 Criteria set out.

1) Context – How does the development respond to its surroundings.

The proposed design respects the surrounding existing residential areas. To the north and east of the subject site, are approved apartment developments, of similar heights and structures. A shadow analysis provided with this planning application shows there will not be overshadowing on the adjoining, existing properties next to the subject site.

2) Connections – How well is the new neighbourhood / site connected?

The site benefits from high levels of connectivity and convenient access to a wide range of transportation options. It benefits from excellent public transportation links, with nearby bus routes providing seamless connections to Dublin's city centre and surrounding areas. Furthermore, the site is located in close proximity to major rail networks including Clongriffin and Donaghmeade Train Stations, facilitating effortless commuting and an avoidance of use of private transport vehicles. Moreover, the provision of bicycle parking spaces promotes sustainable transportation connectivity. High levels of permeability are proposed throughout the site with high quality accessible open spaces providing for an appealing and highly liveable location.

3) Inclusivity- How easily can people use and access the development?

The design incorporates inclusive features, such as accessible car parking spaces and electric vehicle charging points. The inclusion of a childcare facility and an associated secure open play area addresses the needs of families with young children. These features contribute to creating a diverse and inclusive community within the development.

4) Variety – How does the development promote a good mix of activities?

The design incorporates a variety of apartment unit types, ranging from studios to four-bedroom penthouses, catering to different housing needs. The facades have been carefully considered, using a combination of materials such as light-yellow sandstone brick, dark brown vertical wooden panels, and copper-zinc cladding on the upper floors. This blend of materials adds visual variety while maintaining an overall sense of cohesiveness.

Efficiency: How does the development make appropriate use of resources?

Efficiency is addressed through the layout and massing of the building. By utilizing stepped courtyards and open terraces, the design maximizes natural light and ventilation. The arrangement of the apartments and the provision of communal open space ensure efficient use of the available land while providing a high quality of living for the residents.

5) Distinctiveness: How do the proposals create a sense of place.

The design incorporates distinct elements, such as the use of copper-zinc cladding on the top four floors, to create a unique identity for the development. This distinctiveness adds to the architectural character of the building and contributes to the overall visual richness while maintaining a sense of simplicity.

6) Layout: How does the proposal create people friendly streets and spaces

The layout of the development prioritizes the massing and scale of the building to enhance the entrance to the neighbourhood and the surrounding urban realm. The stepped height approach creates visual interest and allows for free air circulation and pedestrian access. The layout also ensures privacy and amenity for the residents by providing private terraces/balconies for all apartments.

7) Adaptability: How will the buildings cope with change

The floor plans of the proposed development prioritize adaptability. With a range of apartment sizes and open layouts, residents have the flexibility to customize their living spaces to meet

their changing needs. The inclusion of multifunctional areas, like the multipurpose room, offers versatility for various activities. Private terraces/balconies provide outdoor retreats that can be personalized. These design elements ensure that the floor plans can easily adapt to residents' evolving lifestyles and preferences.

8) Public Realm: How safe, secure and enjoyable are the public area?

The design contributes to the public realm by incorporating a café unit with associated outdoor seating, a gymnasium, a multipurpose room, and a residents' lounge. These amenities not only enhance the quality of life for the residents but also provide spaces for community interaction and engagement. The provision of communal open spaces and green roof garden terraces further enhances the public realm and promotes a sense of community.

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

The design addresses privacy and amenity by providing private terraces/balconies for all apartments. The inclusion of a gymnasium, multipurpose room, and residents lounge contributes to on-site amenities, promoting a high quality of life for the residents.

10) Parking: How will the parking be secure and attractive?

The design includes a provision for approximately 49 car parking and 326 bike parking spaces, including accessible spaces and electric vehicle charging points, to meet the needs of residents and visitors. This allocation considers the requirements of the development and promotes sustainable transportation options.

11) Detailed Design: How well thought through is the building and landscape design?

The design approach emphasizes both richness and simplicity in the architectural details. The facades are kept simple and ordered, while the use of different materials and colours adds variation and interest to the building's appearance. This attention to detail contributes to the overall aesthetic quality of the development.

The landscape design and building design is elaborated in the Design Statement provided by CWPA Planning & Architecture. The structure is designed to meet the building regulations.

5.6 Sustainable Urban Housing: Design Standards for New Apartment (December 2022).

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, with updates to these guidelines in December 2020.

The subject site represents a significant development on highly accessible brownfield lands in the North Fringe of Dublin City, and as such represents a project that is fully supported by the Guidelines.

The Guidelines identify Central/ Accessible Urban Locations which are suited to higher density development. The site falls within this category as it is a *'Site within reasonable walking distance to / from high-capacity urban public transport stops'*. This includes Clongriffin and Donaghmeade Train Stations located c. 400m and c. 1 km from the site respectively. The site is also located c. 100 m from high frequency urban bus network services provided at Bus Stop 5156. In addition, the subject site is located within walking distance of the Baldoyle Industrial Estate offering employment opportunities. As highlighted elsewhere in this report it is anticipated that Clongriffin will be served by Bus Connects Core Route Corridor.

Table 2 below addresses the consistency of the proposed apartment development with the design standards of the *'Sustainable Urban Housing: Design Standards for New Apartments 2020'*.

Table 2: Consistency with Sustainable Urban Housing: Design Standards for New Apartments 2020.

Design Standard	Required	Provided
Studio apartment	37 sqm	37 sqm, 39 sqm
1 – bed apartment	45 sqm	52 sqm, 61 sqm
2 – bed apartment	73 sqm	81 sqm, 87 sqm, 73 sqm
3 – bed apartment	90 sqm	105 sqm
% of Dual Aspect Provisions	33%	48%
Proposed Floor to Ceiling Height	2.7 m	2.7 m, 2.4 m
Private Amenity Space Provision	4 sqm (Studio) 5 sqm (1 bed) 6 sqm (2 bed) 9 sqm (3 bed)	9.3 sqm, 10.7 sqm More than 8.5 sqm More than 7.5 sqm More than 9.4 sqm
Storage Provision	3 sqm (Studio) 3 sqm (1 bed) 5 sqm (2 bed) 9 sqm (3 bed)	3 sqm, 3.5 sqm 3 sqm 5 sqm 9.4 sqm
Communal Open Space Provision	60 sqm – 15 no. Studio 90 sqm – 18 no. 1 bed 468 sqm – 78 no. 2 bed 63 sqm – 7 no. 3 bed Total = 681 sqm	1877 sqm Open Space 856.61 sqm Green Terrace
Car Parking Provision	47	49
Bicycle Parking Provision	326	326

5.7 Urban Development and Building Heights (December 2018).

The proposed development has been designed with careful consideration for the design guidelines and SPPR's of the Urban Development and Building Heights Guidelines. Please refer to the accompanying Design Booklet prepared by CWPA and the associated '*Height Statement*' where the consistency of the proposed development is comprehensively addressed.

5.8 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 Waterman Moylan 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. Waterman Moylan along with the rest of the design team have interrogated the DMURS principles to ensure the final layout provides a high quality urban extension in proximity to the Docklands. In addition, Waterman Moylan have prepared a DMURS Statement of Consistency which accompanies this planning application documentation.

5.9 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.

1 no. creche facility is provided at ground floor level to serve the development together with a set down area and associated play ground in accordance with the Guidelines. The proposed creche can cater for up to 35 no. children.

5.10 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:

- *to reduce overall travel demand*
- *to maximise the efficiency of the transport network*
- *to reduce reliance on fossil fuels*
- *to reduce transport emissions and*
- *to improve accessibility to transport*

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

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

The subject site encourages sustainable and smarter travel by providing high density development on greenfield lands in close proximity to high frequency public transport connecting the site with employment areas within Dublin City. In addition, through the reduction of car parking and provision of significant cycle facilities where 266 bike parking spaces are provided within the design.

5.11 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.

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

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 Waterman Moylan. The primary objective of the SSFRA is to inform a site design that can manage the impacts of surface water across the site without negatively impacting areas off the site.

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

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

5.13 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.

A Stage 1 Appropriate Assessment Screening and Stage 2 NIS is being prepared will be submitted as part of Stage 4 for the consideration of Fingal County Council.

5.14 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.

The proposed development is well below the 500 residential unit threshold for a mandatory EIA, however, it is intended to prepare an Environmental Impact Assessment Screening prior to lodgement of the official LRD as part of Stage 4.

5.15 Fingal County Council 2023-2029

The subject site is zoned RA '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 Fingal Development Plan 2023 – 2029 was made on 22nd February 2023 and came into effect on 5th April 2023.

The proposed development is either consistent with or will support the achievement of the following policies and objectives contained in the newly adopted Fingal Development Plan 2023 – 2029.

Policy SPQHP35 – Quality of Residential Development - Promote a high quality of design and layout in new residential developments at appropriate densities across Fingal, ensuring high-quality living environments for all residents in terms of the standard of individual dwelling units and the overall layout and appearance of developments. Residential developments must accord with the standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG 2009 and the accompanying Urban Design Manual – A Best Practice Guide and the Sustainable Urban Housing; Design Standards for New Apartments (DHLGH as updated 2020) and the policies and objectives contained within the Urban Development and Building Heights Guidelines (December, 2018). Developments should be consistent with standards outlined in Chapter 14 Development Management Standards.

Objective SPQHO35 – Private Open Space Require that all private open spaces for houses and apartments/duplexes including balconies, patios, roof gardens and rear gardens are designed in accordance with the qualitative and quantitative standards set out set out in Chapter 14 Development Management Standards.

Objective SPQHO36 – Public open Space Public open space provision in new residential developments must comply with the quantitative and qualitative standards set out in Chapter 14 Development Management Standards.

Objective DMSO20 – Schedule of Accommodation All planning applications for residential development shall be accompanied by a Schedule of Accommodation to demonstrate compliance with housing and apartment standards.

Objective DMSO24 – Apartment Development All applications for apartment development are required to comply with the Specific Planning Policy Requirements (SPPRs), the standards set out under Appendix 1 and general contents of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020 (or updated guidance as may be in place at the time of lodgement of the planning application).

Objective DMSO68 – Playground Facilities within Residential Development Provide appropriately scaled children's playground facilities within residential development. Playground facilities shall be provided at a rate of 4 sq m per residential unit. All residential schemes in excess of 50 units shall incorporate playground facilities clearly delineated on the planning application drawings and demarcated, built and completed, where feasible and appropriate, in advance of the sale of any units.

Objective DMSO73 – Balconies, Roof Terraces or Winter Gardens Require private balconies, roof terraces or winter gardens for all apartments and duplexes comply with or exceed the minimum standards set out in Table 14.14.

Objective DMSO74 – Screening of Private Open Space Require balconies, ground floor private open space, roof terraces or winter gardens be suitably screened in a manner complimenting the design of the building so as to provide an adequate level of privacy and shelter for residents.

Objective DMSO236 – Segregation and Collection of Waste Ensure all new large-scale residential and mixed-use developments include appropriate facilities for source segregation and collection of waste.

Objective DMSO237 – Distance from Front Door to Communal Bin Area 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.

Below are tables contained in FCC'S current development plan, that the proposed development complies with.

Table 5: Minimum Requirements for Apartments. (Table 14.7 FDP)

Unit Type	Size (sqm)	Private Space Required (sqm)	Open Space Required (sqm)	Communal Open Space Required (sqm)	Storage Space Required (sqm)
Studio (1 person)	37	4	4	4	3
One bedroom (2 persons)	45	5	5	5	3
Two bedroom (3 persons)	63	6	6	6	5
Two bedroom (4 person)	73	7	7	7	6
Three bedroom (5 person)	90	9	9	9	9

4.16 Baldoyle- Stapolin LAP 2013-2023

The Baldoyle – Stapolin LAP was adopted in May 2013 and was extended for an additional 5 – year period until May 2023. This document has since expired, however, detailed consistency of this document is addressed where relevant in the accompanying Design Statement prepared by CWPA.

5.0 Part V

Pursuant to Part V of the Planning and Development Act, 2000 (as amended) which refers to the requirement to provide 10% social and 10% affordable 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 intends to comply fully with their Part V obligations. Please refer to the accompanying Part V drawing submitted by CWPA as part of this LRD submission pack.

6.0 Conclusion

The statement set out herein demonstrates the consistency of the proposed development with the relevant national, regional and local planning policy context.

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

Consistency with the policies and provisions of the Final County Development Plan 2023-2029 and the Baldoyle-Stapolin LAP 2013 at a local level, is also demonstrated within this report.

It is respectfully submitted that the proposed development will provide for an appropriate form of high-quality residential development over and above the permitted development.

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.