



Fingal County Council,  
Planning Department,  
County Hall,  
Main St.  
Swords,  
Co. Dublin,  
K67 X8Y2 .

December 14<sup>th</sup>, 2023

**Re: Planning Application for Proposed Large Scale Residential Development of 120 no. Residential Units at Grange Road, Baldoyle, Dublin 13.**

**Statement of Response to LRD Opinion (FCC Ref: LRD0019/S2).**

Dear Sir/Madam,

This letter accompanies a Large - Scale Residential Development (LRD) application submitted on behalf of Rondesere Ltd. which is seeking permission for 120 no. residential units at Grange Road, Baldoyle, Dublin 13. This letter responds to the Stage 2 LRD Opinion issued by Fingal County Council (FCC) under FCC Ref: LRD0019/S2. In addition, this letter responds to various technical considerations set out in this LRD Opinion by the various Departmental Sections in the Local Authority.

The initial Stage 1 Consultation (LRD0019/S1) was undertaken with FCC on the 12<sup>th</sup> of January 2022 under Section 247 of the Planning and Development Act 2000 (the Planning Act). The Stage 2 LRD Meeting (LRD0019/S2) was held between the Design Team and the Local Authority on the 19<sup>th</sup> of September 2023 and the subsequent LRD Opinion was issued on the 17<sup>th</sup> of October 2023 in accordance with section 32D of the Planning Act. A copy of the LRD Opinion is attached as Appendix 1 as part of this correspondence.

Having considered the Stage 2 LRD submission, FCC concluded the following in respect of the proposed development;

*"Fingal County Council has considered the documentation submitted with the consultation request under Section 32B of the Planning and Development Act, 2000, as amended, and is of the opinion that the*

*documents submitted documents require further consideration to constitute a reasonable basis for an application for a Lare – Scale Residential Application".*

The LRD Opinion identifies 4 items in respect of which the Stage 2 application, as submitted to inform the LRD Meeting, did not constitute a reasonable basis on which to make an application. In summary, the items identified relate to the following:

**1. Density, Scale, Massing and Layout.**

**2. Visual Impact.**

**2. Public and Communal Open Space Provision.**

**3. Shortfalls of Car Parking and Bicycle Parking provision.**

This additional information, required to ensure a reasonable basis on which to make an application, has been incorporated into the comprehensive documentation submitted herewith. A summary response to each of the items raised is provided in Section 1 below.

In addition, pursuant to article 16A(7) of the Planning and Development Regulations 2001-2023 (as amended) (Planning Regulations), the LRD Opinion sets out a series of bullet points relating to specific information requested by various FCC Departmental Sections requiring further amendment to the proposed development. In this regard, Section 2 provides a summarised response referring to other documentation where a more detailed or technical response is provided.

## **1. Information Required under Section 32D(2) to constitute a Reasonable Basis on which to Make and Application**

### **1.1 Density, Scale, Massing and Layout & Visual Impact**

Items 1 and 2 were set out by FCC in the LRD Opinion as follows;

***“1. The applicant should address concerns regarding the proposed density, scale massing and layout at this location including having regard to the provisions of the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009; the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020 and the Fingal County Development Plan, 2023-2029.***

***Insufficient justification has been provided in relation to the height and massing of the proposed development having regard to Section 3.2 and Specific Planning Policy Requirement 3 of the Urban Development and Building Heights Guidelines for Planning Authorities, issued by the Department of Housing, Planning and Local Government in December 2018; Section 3.5.5 of the Fingal Development Plan 2023-2029 and the design approach advocated in the Baldoyle-Stapolin Local Area Plan 2013 (as extended).***

***2. The applicant should address concerns regarding visual impacts on this visually prominent site. Further consideration and/or justification of the documents as they relate to the design approach of the proposed development and the potential for any negative visual impact to the adjoining sites and surrounding environs should be provided.***

***The further consideration/ justification should address the concern with overshadowing, overbearing and overlooking of the adjacent school site and existing residential units to the north due to the height proposed, proposed design and massing, inter alia the impact along the Grange Road to the south, Myrtle Road and Longfield Road to the north and compliance with Section 3.2 of the Urban Development and Building Heights: Guidelines for Planning Authorities (2018). Particular regard should be had to the 12 criteria set out in the Urban sign Manual which accompanies the Guidelines for Planning Authorities on Sustainable Residential development in Urban Areas (May 2009) and the requirement to provide a sense of place.”***

**Response:** We wish to confirm that the proposed density, scale, massing and layout of the development formed key design considerations in the preparation of this planning application. Such considerations have been informed by the relevant planning policy documents pertaining to the site, a detailed review of the planning history in the surrounding area together with a number of site specific assessments which have now been undertaken in respect of the proposed development. This includes assessments relating to noise, lighting, micro - climate/ wind impacts and daylight and sunlight assessments, all of which demonstrates that the proposed development can be provided in a manner which will protect the receiving environment and residential and visual amenities of existing and future residents. The proposed Large – Scale Residential Development now before the Local Authority is the same as that proposed at Stage 2 in terms of massing and scale and consists 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). It is recognised that the Local Authority had remaining concerns regarding this level of development on the site. However, noting the additional site specific assessments now carried as requested in the LRD Opinion, we respectfully request that the Local Authority assess the proposed development in the context of these new reports, which provide additional justification for the proposed development, and reconsider their position in terms of density, scale, massing and layout as proposed.

### **1.1.1 Statement of Consistency & Design Report**

A 'Planning Report and Statement of Consistency' was previously submitted by CWPA Planning & Architecture for the consideration of the Local Authority as part the Stage 2 LRD meeting request. Amongst various additional planning policy documents, this report addressed the consistency of the development with the planning policy documents referenced above in the LRD Opinion, including the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009', the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020', the Fingal County Development Plan 2023-2029 and the Baldoyle Stapolin LAP 2013 (now expired).

Of particular note is that the subject site is located c. 600 m (8 – min walking distance) from Clongriffin Dart Station and thus meets the criteria to be appropriately categorised as a 'Central and Accessible Urban Location' as defined in the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020'. The Guidelines give clear instruction that Planning Authorities are to encourage and facilitate increased building heights and densities at such locations, subject to the

protection of the receiving environment. We believe the full suite of site specific assessments now before the Local Authority demonstrates the proposed development will ensure the achievement of this. In addition, it is recognised that the site was previously identified by Fingal County Council as a '*Punctuation Node*' in the now expired Baldoyle – Stapolin LAP and that such designations related to lands located at '*key junctions*' and '*strategic locations*' within the designated LAP boundary, where the potential for increased building heights were envisaged. The Local Authority have considered the subject site as a '*Peripheral Site*' in the LRD Opinion, however, '*Peripheral and/ or Less Accessible Urban Locations*' are defined in the '*Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020*' as follows:

- Sites in suburban development areas that do not meet proximity or accessibility Criteria.
- Sites in small towns or villages.

As stated above, the subject site is defined under national policy as a 'Central and Accessible Urban Location' which more appropriately describes and subject site and which is guided by national planning policy as referenced above. Furthermore, the subject site represents a vacant, infill, underutilised and brownfield site within a compact urban environment. As such, the proposed development at the scale proposed is in line with overarching national and regional policy and will support the achievement of the 'National Strategic Outcome of Compact Growth' (NSO 1) in the NPF 2040 and the 'Regional Strategic Outcome of Compact Growth and Regeneration' in the RSES 2019 – 2031 which instructs Local Authorities to '*Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens. (NSO 1)*'. It is further noted that there is no reference to the site being categorised as '*peripheral*' in any planning policy document, including the Baldoyle – Stapolin LAP.

A new '*Planning Report and Statement of Consistency*' has been prepared as part of this Stage 3 LRD Application, taking account of the new site specific assessments which have been undertaken. Please refer to this enclosed report for further information which sets out the planning rationale and justification for the proposed development together with addressing the consistency of the proposed development with relevant planning policy.

In addition, a Design Report was submitted as part of Stage 2 with a detailed '*Height Statement*'. We submit this report demonstrated the proposed development is in line with the Development Management

Criteria for Taller Buildings as set out under Section 3.2 and SPPR 3 of the Urban Development and Building Heights Guidelines, 2018. A revised '*Architectural and Urban Design Statement*' is now enclosed as part of this LRD planning application, taking account of additional on – site assessments. Please refer to this report and in particular Section 5 for further information in respect of compliance with the Urban Development and Building Heights Guidelines for Planning Authorities 2018, including Section 3.2 and SPPR 3.

### **Amendments**

The development proposed at Stage 1 (LRD0019/S1) consisted of 138 no. apartments which was not considered suitable for the site in terms of scale and massing. To this end, a detailed and technical assessment of the massing of the proposed development and its potential impact on the receiving environment was undertaken by the Design Team together with Digital Dimensions to provide a technical, evidence-based rationale for amending the scheme. Specifically, a Daylight and Sunlight Assessment was undertaken as part of this detailed massing exercise to reveal the extent to which the massing of proposed development needed to be revised in order to meet the requirements of the Building Research Establishment (BRE) BR209: 2022 "*Site Layout Planning for Daylight and Sunlight*" (Third edition). This resulted in the following specific amendments to the proposed development which were presented to the Local Authority at Stage 2 (LRD0019/S2).

- ***A total reduction of 18 no. units as part of the development from 138 – 120 no. units.***
- ***The height has been reduced from 14 to 12 storey, part of 10 to 7 storey, part of 10 to 9 storey, part 10 to 5 storey, part 9 to 8 storey and part 9 to 4 storey.***
- ***The resultant density has been reduced from 345 to 266.6 Units/Hectare.***

Figure 1 and 2 below illustrate the amendments which were introduced to the scheme between stages 1 and 2.



The above amendments ensure that daylight and sunlight access to existing residential units at Myrtle Avenue will all continue to meet the required standards as per the BR209 Guidelines. In addition, the necessary revisions to the building form will reduce the overbearance effect of the proposed development in terms of visual impact. Please note this assessment has been revised to include an internal analysis of the proposed development together with the adjoining school to the west as requested in the LRD

Opinion. Please refer to this report together with additional site specific assessments which have since been undertaken in respect of noise, lighting and micro-climate/ wind impacts as requested in the LRD Opinion, all of which demonstrates that the proposed development can protect the character of the receiving environment. In addition, a series of photomontages together with a Visual Impact Assessment have also been provided for the consideration of the Local Authority.

### **1.1.2 Planning History**

The design amendments that have been incorporated into the proposed development have also been informed by the planning history in the surrounding area. It is considered the revised design will resemble recent planning approvals in the immediate area in terms of scale and massing as well as elsewhere within Fingal County Council. Please refer to the enclosed '*Architectural and Urban Design Statement*' which illustrates the various case precedents which have been considered.

The planning history in the surrounding area consists of a number of significant planning applications spanning across the administrative jurisdictions of Fingal County Council and Dublin City Council. These approved planning applications demonstrate that future development in the vicinity is set to be largely characterised by compact, consolidated and high density development with apartment blocks ranging from 6 – 17 storeys in height. 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. A separate 15 no. storey apartment block approved under the same application will be located c. 460 m to the north of Clongriffin Dart Station, which is an equal distance to the subject site 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 from 6 – 7 storeys tall. However, it is understood that the previous SHD approvals may be still at Judicial Review stage and if an outcome is reached in favour of these applications, 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.

As stated above, it is considered the proposal now before the Local Authority will resemble a development which is consistent with these recent planning approvals by Fingal County Council. Please refer to the '*Architectural and Urban Design Statement*' prepared by CWPA Planning & Architecture for further information in this regard which sets out the '*Height Strategy*' for the proposed development in the context of these recently approved developments.

A detailed assessment of the height and density of these recently approved planning applications has been undertaken by CWPA Planning & Architecture specifically in terms of compliance with the now expired Baldoyle – Stapolin LAP 2013. This assessment is considered critical to this planning application and has informed the nature and content of the proposed development. As demonstrated in Table 1 below, this assessment has revealed that past planning applications within the Baldoyle Stapolin LAP area, the most recent of which were approved in March 2023, have consisted of heights and densities which were beyond well in excess of what was previously envisaged in the LAP. It is further noted that these developments were approved by Fingal County Council whilst the Baldoyle Stapolin LAP had not expired. Under the SHD process (Shoreline SHD 1 and 2) Fingal County Council issued comprehensive recommendations to An Bord Pleanála to approve heights as tall as 15 storeys, a 150% increase in the maximum height allowance under the LAP. Maximum densities approved as a result were 207 uph (Shoreline 1) and 390 uph (Shoreline 2), which again the Planning Authority recommended approval for to An Bord Pleanála. Shoreline LRD 1 and LRD 2 have since been approved by Fingal County Council which sees a reduction in the maximum heights provided in these areas to 10 storeys, however, this is still 100% of an increase over the maximum height allowable under the LAP. Approved densities under these revised LRD's have been reduced to 187.9 uph and 338 uph, which is still an extraordinary increase from what was typically envisaged under the LAP, approved by Fingal County Council. Please refer to Table 1 below which demonstrates that this proposed LRD application is consistent with these recent planning approvals by Fingal County Council in terms of density, scale and massing. Having regard to this, and noting the increased building heights approved by Dublin City Council west of Clongriffin Dart Station, we respectfully submit that the proposed development is of a suitable density and scale and will respond sensitively to the receiving environment.

Planning Applications	Maximum Heights Allowable under LAP	Heights Approved by Fingal CoCo	Applicable LAP Densities (Units per Hectare)	Approved Densities by Fingal CoCo (Units per Hectare)
<b>Shoreline SHD 1 (310418-21)</b>	2 – 5 storeys	<b>2 - 15 storeys</b>	Area A (38 – 42 uph)  Area C (50 – 80 uph)	<b>50 uph (Area A)</b>  <b>207 uph (Area C)</b>
<b>Shoreline LRD 1 (LRD0015/S3)</b>	2 – 5 storeys	<b>6 - 10 storeys</b>	Area C (50 – 80 uph)	<b>187.9 uph (Area C)</b>
<b>Shoreline SHD 2 (311016 – 21)</b>	2 - 4.5 storeys	<b>2 - 15 storeys</b>	Area B (42 – 50 + uph)  Area C (50 – 80 + uph)	<b>Gross Density (177 uph)</b>  <b>390 uph (Area C)</b>
<b>Shoreline LRD 2 (LRD0016/S3)</b>	4 – 4.5 storeys	<b>4 - 10 storeys</b>	Area B (42 – 50 + uph)  Area C (50 – 80 + uph)	<b>Gross Density (163 uph)</b>  <b>338 uph (Area C)</b>

<b>Proposed Baldoyle LRD</b>	3-4 storeys	<b>4 – 12 storeys</b>	Area B (42 – 50 + uph)	<b>266 uph (Area B)</b>
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Having regard for the aforementioned we respectfully submit that the additional information now presented before the Local Authority addresses concerns in respect of density, scale, massing and overall height together with visual impact and we request that this information is taken into consideration in the assessment of this LRD application.

## 1.2 Public and Communal Open Space Provision

Item 3 was set out by FCC in the LRD Opinion as follows;

***"2. No provisions have been made for Public Open Space in this proposed development which should comprise 12% of the site area. Insufficient justification has been provided in relation to this approach. Further consideration and/or justification of the documents as they relate to the provision and delivery of Public and Communal Open Space required to serve the development having regard to, inter alia, the provisions of the sustainable Urban Housing: Design Standards for New Apartments (2020, the Fingal County Development Plan 2023-2029 and the Baldoyle-Stapolin Local Area Plan should be provided.***

***This further consideration/justification should clearly indicate where the public open space is to be provided, how it is going to be delivered and when it is going to be delivered relative to the development of the proposed apartments it is to serve. Landscaping proposals for the public open space should be submitted and clarity provided around how the landscaping is to be delivered if the public open space area is not to be included within the application site boundary. A quantitative and qualitative assessment which provides a breakdown of the communal and public open space, and shall detail the functionality of any play area, water features, informal play areas, and other spaces should also be included."***

**Response:** The quantity of public open space is set out under Section 4.5.2.3 of the recently adopted Fingal Development Plan 2023 – 2029.

*"4.5.2.3 Quantity It is important that a wide variety of public open space is provided throughout Fingal. For all developments with a residential component, the overall standard for public open space provision is a minimum 2.5 hectares per 1000 population. In general, this shall be provided at a ratio of 75% Class 1 and 25% Class 2. In order to provide existing and future communities with adequate recreational and leisure opportunities, the Council will employ a flexible approach to the delivery of public open space and more intensive recreational/amenity facilities. It is the intention of the Council, however, to ensure, except under exceptional circumstances, public open space provision is not less than 12% of a development site area. This provision recognises the contribution residential open space makes to multi-functional urban green infrastructure and nature-based solutions such as Sustainable Urban Drainage (SuDS)".<sup>1</sup>*

For the purposes of calculating public open space requirements, it is noted that the area of the subject site is c. 4533.2 m<sup>2</sup> (0.45 Hectares/ 1.12 Acres). 12 % of this site area equates to 544 m<sup>2</sup>. The proposed apartment development is subject to the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020', for the purposes of calculating a separate communal open space requirement. Having regard to the requirements of Appendix 1 of the above – mentioned Guidelines, the proposed 120 no. unit development (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) generates a communal open space requirement of 720 m<sup>2</sup> to serve future residents. The combined public open space requirement (544 m<sup>2</sup>) and communal open space requirement (720 m<sup>2</sup>) results in a combined quantum of 1, 264 m<sup>2</sup>. Open space at ground floor level across the site extends to c. 1, 877 m<sup>2</sup>, exceeding both the communal and public open space quantum requirements. In addition, an extra c. 860.7 m<sup>2</sup> of open space is provided for residents throughout the development in the form of landscaped terraced gardens.

A full set out landscape drawings have been prepared by RMDA Landscape Architects together with an associated 'Landscape Rationale Report' and 'Green Infrastructure Plan'. The enclosed Landscape Masterplan clearly indicates where the public open space is to be provided within the development. Please refer to these drawings for further information which provide a comprehensive breakdown of landscaping proposals to serve the development together with the functionality of these landscaped areas in terms of formal and informal play areas, public realm enhancement works, hard and soft landscaping and boundary treatments. The proposed landscaping works have been designed to compliment the development and surrounding area visually.

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<sup>1</sup> FDP 2023 – 2029, Section 4.3.5.2, Pg. 186.

Table 2: Breakdown of Public and Communal Open Space Requirements.

Quantum of Public and Communal Open Space	Areas
Site Area	4533.2 m2/ 0.45 Hectares/ 1.12 Acres.
POS requirement 12% Site Area	544 m2.
COS requirement under 2023 Apt Guidelines	720 m2.
POS and COS Requirement	1, 264 m2.
POS and COS Provision	1, 877 m2.
Terraced Gardens Total	c. 860.7 m2.

### 1.3 Shortfalls of Car Parking and Bicycle Parking provision.

Item 2 was set out by FCC in the LRD Opinion as follows:

***“3. Insufficient justification has been provided regarding shortfalls in car parking and bicycle provisions. The proposed parking provision is circa 20% below the car parking standards and the bicycle parking is 25% below the standards as set out in the Fingal Development Plan 2023-2029. Further consideration and/or justification of the documents as they relate to car and bicycle parking as set in the Fingal Development Plan 2023-29 should be provided. A Traffic and Transport Assessment including, inter alia, a rationale for the proposed car parking provision should be prepared, to include details of car parking management, car share schemes and a mobility management plan.”***

*Response:* As part of this LRD planning application, Waterman Moylan Consulting Engineers have prepared comprehensive Traffic and Transport Assessment (TTA) for the consideration of the Local Authority. The enclosed TTA sets out the following rationale and justification for the proposed car parking and bicycle parking provisions.

### 5.3 Car Parking

To ensure adequate residential parking provision, the Fingal Development Plan (2023 – 2029) created the following two distinct car parking zones:

- Zone 1: relates to developments within 800m of Bus Connects spine route, or 1,600m of an existing or planned Luas/Dart/Metro Rail station or within an area covered by a Section 49 scheme, or in lands zoned Major Town Centre.
- Zone 2: Relates to all other areas within the County.

The proposed development is located within the 1,600m criteria from a rail station (c. 500m from Clongriffin station) and therefore is located in Zone 1.

Car parking standards for new developments are set out in Table 14.19 of the Fingal Development Plan (2023 – 2029). Those relevant to the proposed scheme are shown in Table 2 below.

Table 1 Car Parking Standards – Fingal Development Plan (2023 – 2029).

Land Use Category	Standards (Zone 1)
Residential (1-2 Bedroom)	0.5 space per unit (Max)
Residential (3-3+ Bedroom)	1 space per unit (Max)

In addition to the above, the FDP also sets out the following with regards to car parking (relevant to the proposed development):

*"Electric Vehicle Parking: All multi-unit residential developments shall incorporate EV charging points at 20% of the proposed parking spaces and appropriate infrastructure (e.g. ducting) to allow for future fit out of a charging point at all parking spaces."*

### 5.4 Cycle Parking

Bicycle parking standards for new developments are set out in Table 14.17 of the Fingal Development Plan (2023 – 2029). Those relevant to the proposed development are summarised in Table 3 below.

Table 2 Bicycle Parking Standards – Fingal Development Plan (2023 – 2029).

Land Use Category	Bicycle Parking Standards	
	Long-Stay	Short-Stay
Residential (1-2 Bedroom)	1, plus 1 per bedroom	0.5 per unit (for apartment blocks only)
Residential (3+ Bedroom)	2, plus 1 per bedroom	0.5 per unit (for apartment blocks only)

## 6. Sustainable Urban Housing: Design Standards for New Apartments

### 6.1 Car Parking

The ‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020’ categorise site locations based on proximity to high frequency public transport infrastructure, town/city centres and employment areas as follows;

#### 1) Central and/or Accessible Urban Locations

- Sites within walking distance (i.e., up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third level institutions.
- Sites within reasonable walking distance (i.e., up to 10 minutes or 800-1,000m) to/from high-capacity urban public transport stops (such as DART or Luas) and
- Sites within easy walking distance (i.e., up to 5 minutes or 400-500m) to/from high frequency (i.e., min 10-minute peak hour frequency) urban bus service.

#### 2) Intermediate Urban Locations

- Sites within or close to i.e., within reasonable walking distance (i.e., up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions.
- Sites within walking distance (i.e., between 10-15 minutes or 1,000-1,500m) of high-capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e., between 5-10 minutes or up to 1,000m) of high frequency (i.e., min 10 minutes peak hour frequency) urban bus services or where such services can be provided.
- Sites within easy walking distance (i.e., up to 5 minutes or 400-500m) of reasonably frequent (min 15-minute peak hour frequency) urban bus services.

### 3) Peripheral and/or Less Accessible Urban Locations

- Sites in suburban development areas that do not meet proximity or accessibility criteria.
- Sites in small towns or villages.

Chapter 4 of the Design Standard for New Apartments sets out the quantum of car parking or the requirement for any such provision for apartment developments.

#### 1) Central and/or Accessible Urban Locations

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 policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity.

#### 2) Intermediate Urban Locations

In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard.

### 3) Peripheral and/or Less Accessible Urban Locations

As a benchmark guideline for apartments in relatively peripheral or less accessible urban locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.

Based on the above, in the case of the subject site, which is located in an urban area within 500m of a major public transport corridor, it is recommended that car parking **'be minimised, substantially reduced or wholly eliminated.'**



## 6.2 Cycle Parking

Section 4.17 of the Design Standards recommends in relation to the quantity of cycle parking.

- A general minimum standard of 1 cycle storage space per bedroom shall be applied.
- For studio units, at least 1 cycle storage space shall be provided.
- Visitor cycle parking shall also be provided at a standard of 1 spaces per 2 residential units.

## 7. Parking

### 7.1 Proposed Car Parking

The proposed development will consist of 120 apartments with 47 residential car parking spaces at basement level. Two additional spaces are provided at surface level as drop-off for the Creche and visitors.

The residential parking provision equates to a ratio of 0.4 parking spaces per unit and is in line with the Fingal Development Plan (2023 – 2029) and the Design Standards for New Apartments (2022). This provision is considered appropriate for the proposed development.

The parking provision of 47 residential spaces includes 2 no disabled spaces (5%) and 9 spaces fitted for electric charging (20%). All of the other parking spaces will have ducting infrastructure to allow for future installation of electric vehicle charging points should the demand for this facility require same.

The breakdown of the residential car parking spaces is outlined below:

- 15 no. Studios: 5 car parking spaces proposed.
- 18 no. 1-bed: 6 car parking spaces proposed.
- 78 no. 2-bed: 32 car parking spaces proposed.
- 9 no. 3+-bed: 4 car parking spaces proposed.

## 7.2 Proposed Cycle Parking

### 7.2.1 Fingal County Development Plan

Based on the standards set out in the County Development Plan, the bicycle parking spaces required to serve the subject development are set out in Table 4.

Table 3 Bicycle Parking Requirement – Fingal Development Plan (2023 – 2029).

Proposed Development		Bicycle Parking Spaces Required	
Type	No. Units	Long-Stay	Short-Stay
Studio	15	30	7.5
1-Bed Apartments	18	36	9
2-Bed Apartments	78	234	39
3-Bed Apartments	7	35	3.5
4-Bed Penthouses	2	12	1
Total	120	347	60

### 7.2.2 Design Standard for New Apartments

However, if the standards set out in Design Standard for New Apartments were to be applied, the quantum would reduce to spaces as per Table 5.

Table 4 Bicycle Parking Requirement – Design Standard for New Apartments

Proposed Development		Bicycle Parking Spaces Required	
Type	No. Units	Long-Stay	Short-Stay
Studio	15	15	7.5
1-Bed Apartments	18	18	9
2-Bed Apartments	78	156	39
3-Bed Apartments	7	21	3.5
4-Bed Penthouses	2	8	1
Total	120	218	60

### 7.2.3 Proposed Cycle Parking

The total cycle parking requirement based on the Fingal County Development Plan is 407 spaces for 120 apartments as calculated in Table 3.

The total cycle parking requirement based on the Design Standards for Apartments is 278 spaces for 120 apartments as calculated in Table 4.

A total of 420 bicycle parking spaces are proposed for the subject development, 360 long-stay for residents provided in the basement level and 60 short-stay for visitors and for the Crèche provided on the ground floor.

Having regard for the above information submitted by Waterman Moylan Consulting Engineers, we respectfully submit that the above concerns of the Local Authority in respect of car parking and bicycle parking provision shortfalls have been overcome as part of this LRD planning application.

### Conclusion

We trust the enclosed submission is sufficient for Fingal County Council to carry out a full and adequate assessment of this LRD Application and we look forward to the decision of the Planning Authority in due course. Should you require any clarification or additional information please do not hesitate to contact the undersigned.

Yours Sincerely,



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Francis Whelan MRIAI.

Managing Director (Architecture).



**Table 1: Summary Table of Information specified under Article 16A (7) Planning &Development Regulations 2021, as amended, to be submitted with the LRD Application.**

Information Requested	Reference Document
PLANNING CONSIDERATIONS	
<ul style="list-style-type: none"> <li><i>A Visual Impact Statement is required, impact on skyline and further visual impact on approach from the west towards the coast.</i></li> </ul>	<p>A Visual Impact Assessment Statement has been provided RMDA Landscape Architects in respect of the proposed development which accompanies photo montages of the proposed development prepared by Digital Dimensions Ltd.</p>
<ul style="list-style-type: none"> <li><i>A report which addresses existing and future residential amenity, and which includes matters such as daylight/sunlight analysis, micro-climate/wind impacts and noise impacts, together with proposals to address any such impacts, if necessary. A daylight/sunlight analysis, showing an acceptable level of residential amenity for future occupiers and neighbours of the proposed development, should include details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties.</i></li> </ul>	<p>A revised Daylight &amp; Sunlight Assessments Report has been prepared by Digital Dimensions Ltd. in respect of the proposed development.</p> <p>A Wind Microclimate Modelling Assessment has been prepared by B- Fluid Ltd. in respect of the proposed development.</p> <p>A Noise Impact Assessment has been prepared by i Acoustics in respect of the proposed development.</p> <p>These site specific assessments demonstrate the proposed development can respond to the unique and individual characteristics of the subject site and its receiving environment. It is considered that these assessments provide</p>

	additional justification for the proposed development since the Sage 2 sage of this LRD process.
<ul style="list-style-type: none"> <li><i>Insufficient justification for a cafe with outdoor seating at ground floor level for residents only has been provided.</i></li> </ul>	The café proposed at ground floor level is now proposed to serve both residents and the public.
<ul style="list-style-type: none"> <li><i>Due diligence is required with regard to AA &amp; EIA screening and following screening a determination as to whether an NIS and/or an EIAR is required.</i></li> </ul>	<p>An EIA Screening has been prepared by CWPA Planning &amp; Architecture as part of this LRD application. Please refer to this enclosed report for further information.</p> <p>An AA Screening has been prepared by EIS Environmental as part of this LRD application. Please refer to this enclosed report for further information.</p>
ARCHITECTURAL AND DESIGN CONSIDERATIONS	
<ul style="list-style-type: none"> <li><i>A Materials Strategy that specifically addresses the proposed materials and finishes for buildings, open spaces, paved areas and boundaries, having regard to the requirement to provide high quality and sustainable finishes and details should be provided. This strategy shall include details of the colour, tone and texture of materials and the modelling and profiling of the materials including any cladding or framework system) on each block. Particular attention is required in the context of the strategic location and visibility of the site taking cognisance of the coastal location, a more considered approach to landscaping at higher floors and to the long term management and maintenance of the proposed development. A Building Lifecycle report should also be submitted</i></li> </ul>	A Material Strategy has been prepared by CWPA Planning & Architecture as part of this LRD application. Please refer to this enclosed report for further information.

<p><i>in this regard, which includes an assessment of the long term running and maintenance costs associated with the development in accordance with Section 6.13 of the 2020 Guidelines on Design Standards for New Apartments.</i></p>	
<p>PARKS AND GREEN INFRASTRUCTURE</p>	
<p><u><i>An integrated Green infrastructure Plan:</i></u></p> <ul style="list-style-type: none"> <li><i>An integrated Green infrastructure Plan is required as outlined in the Councils website guidance on what should be in an LRD application (<a href="https://www.tingal.ie/large-scale-residential-developments-lrd">https://www.tingal.ie/large-scale-residential-developments-lrd</a>).</i></li> <li><i>This plan shall show existing natural features (hedgerows, significant trees, waterbodies) and the proposed green infrastructure network within the development.</i></li> </ul>	<p>As requested, an Integrated Green Infrastructure Plan as per Fingal Development Plan Objective DMSO126 is enclosed as part of this planning application.</p> <p>Objective DMS0126 Requires the submission of an Integrated Green Infrastructure Plan as part of planning applications for residential developments over 50 units and all commercial developments over 2000 sqm.</p> <p>The plan which reflects existing and proposed planting on the new development. Currently there is a hedgerow to the western boundary of the development which shall be retained. The Green infrastructure also provides additional landscape measures that transforms the existing site, by providing new green spaces and planting where none were in existence. Therefore, the increase in the green infrastructure on the site, is total. The proposed development contributes a range of habitats, through suds interventions, wild flower, grass amenity, planting and tree planting.</p>

	<p>Suds details are also included – new habitats that shall be developed through these interventions shall also have an amenity and biodiversity as well as attenuation and cleaning function.</p>
<p><u>SuDS on areas of open space:</u></p> <ul style="list-style-type: none"> <li><i>SuDs on areas of open space should be a maximum of 1:5 to allow for play and maintenance.</i></li> </ul> <p><i>(The submitted details on SuDS indicates 1:3 which would not be acceptable). Full details of the proposed subs should be clearly shown on the landscape plans, in particular in relation to manholes and / head walls.</i></p>	<p>The Suds details shall have margins of 1:5 replacing the 1:3. The landscape plan has been coordinated with the consulting Engineers – Waterman Moylan and reflects the design intent. Sections through the Suds area has also been included.</p>
<p><u>Proposed tree planting in the vicinity of services and structures:</u></p> <ul style="list-style-type: none"> <li><i>It is important that proposed tree planting is not located within at least 2.5 metres of services and walls or other structures on open space areas in order to help avoid any potential conflict or damage into the future. In addition, no trees should be located within 7 metres of lamp standards in accordance with Fingal's Tree Strategy - Forest of Fingal- A Tree Strategy for Fingal. The proposed tree planting plan should be revised to take these issues into account.</i></li> </ul>	<p>No trees are located within 2.5 of a structure. It is proposed to keep medium to large trees to the open space and smaller trees in appropriate positions throughout the scheme.</p>
<p>TRANSPORTATION CONSIDERATIONS</p>	
<p>i. <i>Vehicular crossing of the public footpath should give priority to the pedestrians and cyclists crossing the entrance; and the applicant needs to consider the layout of the entrance taking cognisance of the 'NTA Active Travel Guidance</i></p>	<p>Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to</p>

<p><i>Note on Junction Tightening Schemes', the 'NTAs Safe Routes to School Design Guide' and 'DMURS' standards.</i></p>	<p>Transportation and Water Services Considerations as set out in the Fingal County Council LRD Opinion.</p>
<p>ii. <i>Further detail on the provision of the proposed setback of the northern site boundary along Myrtle Road is required.</i></p>	<p>Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to Transportation and Water Services Considerations as set out in the Fingal County Council LRD Opinion.</p>
<p>iii. <i>The café, gym, yoga room are primarily to cater for residents, and the applicant is not proposing to provide any designated carparking. The applicant would need to demonstrate how these land uses would be limited to residents/justify this approach.</i></p>	<p>Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to Transportation and Water Services Considerations as set out in the Fingal County Council LRD Opinion.</p>
<p>iv. <i>A degree of drop-off provision is required for the creche, and this should ideally not involve reverse manoeuvres. The applicant should further examine the possibility to provide an improved drop-off area for the creche.</i></p>	<p>Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to Transportation and Water Services Considerations as set out in the Fingal County Council LRD Opinion.</p>
<p>v. <i>There would be a cycle parking requirement of a minimum of 359 'long stay' residential bicycle parking spaces. The development is proposing to provide 266 'long stay' residential spaces. This is circa 25% below the standards of the Fingal</i></p>	<p>Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to Transportation and Water Services</p>



<i>Development Plan, and this should be addressed by the applicant.</i>	Considerations as set out in the Fingal County Council LRD Opinion.
vi. <i>The applicant is requested to further examine the possibility of providing a pedestrian entrance to the south of the site.</i>	Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to Transportation and Water Services Considerations as set out in the Fingal County Council LRD Opinion.
vii. <i>Section 14.17.10 of the Fingal Development Plan 2023-2029 states that 'all multi-unit residential developments shall incorporate EV charging points at 20% of the proposed parking spaces and appropriate infrastructure (e.g. ducting) to allow for future fit out of a charging point at all parking spaces'.</i>	Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to Transportation and Water Services Considerations as set out in the Fingal County Council LRD Opinion.
viii. <i>The basement car park needs to be designed in accordance with the requirements of the latest edition of the Design recommendations for multi-storey and underground car parks published by the IStructE.</i>	Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to Transportation and Water Services Considerations as set out in the Fingal County Council LRD Opinion.
ix. <i>A revised Traffic &amp; Transport Assessment needs to be submitted incorporating a junction assessment with the R809.</i>	Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to Transportation and Water Services

	Considerations as set out in the Fingal County Council LRD Opinion.
x. <i>A Stage 1 Road Safety Audit must complete and submitted with the Planning Application, to the satisfaction of the Planning Authority, in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'.</i>	Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to Transportation and Water Services Considerations as set out in the Fingal County Council LRD Opinion.
<b>WATER SERVICES CONSIDERATIONS</b>	
<p><u>Foul Sewer</u></p> <p>i. <i>The applicant proposes to drain wastewater from the site by gravity to the existing wastewater sewer in Myrtle Road to the north of the site. As this is the low point of the site, this proposal allows for the drainage to discharge by gravity without resulting in excessive invert depths. With regard to the basement, the basement will not generate any foul water, however, surface water from the basement is to be pumped to the foul water network.</i></p> <p>ii. <i>A Pre-Connection Enquiry (CDS22008088) was submitted to Uisce Eireann by the applicant. Confirmation of Feasibility (dated January 10th, 2023) was received from Uisce Eireann by the applicant. A wastewater connection is deemed feasible without upgrade. The applicant should be aware that Uisce Eireann require the applicant to re-engage with Uisce Eireann if the PCE or CoF is older than 6 months. The applicant's PCE is dated January 10th, 2023.</i></p>	Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to Transportation and Water Services Considerations as set out in the Fingal County Council LRD Opinion.
<p><u>Surface Water</u></p> <p>i. <i>In Summary, the drainage design is deemed acceptable. The applicant, in discussions, mentioned the feasibility of introducing additional SuDs measures such as bio-retention areas/rain gardens. This would be welcomed. It is considered</i></p>	

<p><i>that the four pillars of surface water design (quality, quantity, bio-diversity and amenity) are adequately addressed/achieved.</i></p> <ul style="list-style-type: none"> <li><i>Applicant must adhere to the requests of FCC Parks/Transportation with regard to:</i> <ul style="list-style-type: none"> <li><i>Permeable paving.</i></li> <li><i>Design and approach to swales/detention basins/retention ponds.</i></li> </ul> </li> </ul>	<p>Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to Transportation and Water Services Considerations as set out in the Fingal County Council LRD Opinion.</p>
<p><u>Water Supply</u></p> <p>i. <i>It is proposed to provide a new 150mm connection to the existing 150mm diameter water supply main at the north of the site.</i></p>	<p>Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to Transportation and Water Services Considerations as set out in the Fingal County Council LRD Opinion.</p>
<p>ii. <i>As noted previously a Pre-Connection Enquiry (CDS22008088) was submitted to Uisce Eireann by the applicant. Confirmation of Feasibility (dated January 10th, 2023) was received from Uisce Eireann by the applicant. A water connection is deemed feasible without upgrade. The applicant should be aware that Uisce Eireann require the applicant to re-engage with Uisce Eireann if the PCE or CoF is older than 6 months. The applicant's PCE is dated January 10th, 2023.</i></p>	<p>Please refer to the separately enclosed 'Response to LRD Opinion' Report prepared by Waterman Moylan for a response to Transportation and Water Services Considerations as set out in the Fingal County Council LRD Opinion.</p>
<p>HOUSING CONSIDERATIONS</p>	
<ul style="list-style-type: none"> <li><i>The applicant is required to submit a full Part proposal to the Housing Section for review. This can be submitted to <a href="mailto:partv@ringal.ie">partv@ringal.ie</a>.</i></li> </ul>	

<ul style="list-style-type: none"> <li>• <i>The applicant is required to provide proof of land purchase in order to avail of the 10% transitional arrangement, the transitional rate applies when:</i> <ul style="list-style-type: none"> <li>a. <i>Where land had planning permission before 3r September 2021 or</i></li> <li>b. <i>the permission is granted during the period beginning on 3 September 2021 and ending on 31 July 2026 and the land to which the application for permission relates was purchased by the applicant, or the person on whose behalf the application is made, during the period beginning on 1 September 2015 and ending on 31 July 2021.</i></li> </ul> </li> <li>• <i>In order to avail of the 10% rate proof of land purchase can be demonstrated through the following ways.</i> <ul style="list-style-type: none"> <li>• <i>Submitting a copy of land registry folio</i></li> <li>o <i>submitting a copy of signed and dated deeds of transfer (commercially sensitive information should be redacted)</i></li> <li>• <i>Submitting a copy of signed and dated contract for sale (commercially sensitive information should be redacted).</i></li> </ul> </li> <li>• <i>The full Part V Proposal should include the following:</i> <ul style="list-style-type: none"> <li>• <i>Part V costings</i></li> <li>• <i>A site layout plan, o Drawings</i></li> <li>• <i>schedule of accommodation</i></li> <li>• <i>Evidence of land purchase date if availing of transitional arrangements.</i></li> </ul> </li> </ul>	<p>A full Part V proposal was submitted to Fingal County Council in advance of submitted this LRD application and the Part V response letter is enclosed as part of the application pack.</p>
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**Appendix 1: Copy of Fingal County Council LRD Opinion (LRD0019/S2).**