

LARGE-SCALE RESIDENTIAL DEVELOPMENT
RESPONSE TO FINGAL COUNTY COUNCIL
OPINION

FOR ALTERATIONS TO PERMITTED GA01 SHD
ABP REG. REF. 310418
BALDOYLE, DUBLIN 13

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**Brady Shipman
Martin**

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THE SHORELINE PARTNERSHIP

DATE
APRIL 2023

Baldoyle GA1 LRD Amendment Application
Response to Fingal County Council Opinion

DOCUMENT CONTROL SHEET

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1 INTRODUCTION

Brady Shipman Martin have prepared this Response to the Opinion of Fingal County Council (FCC), dated February 2023, in relation to a Pre-Application Consultation meeting Reg. Ref. LRD0015/S2 held on 17th January 2023, under Section 32B of the 2021 Act.

The proposed amendments consist of the reduction in height, and corresponding façade and building form enhancements, across Block A1, D1, D2 and D3 of the permitted Strategic Housing Development (SHD) as permitted under ABP Ref. 310418. As a result of the reduction in heights across the referenced blocks, the overall density of the permitted development is reduced from 99 units per hectare (as permitted under ABP Ref. 310418) to 93 units per hectare (as proposed). All other elements of the development remain as permitted under ABP Ref. 310418.

2 RESPONSE TO FINGAL COUNTY COUNCIL

In its Opinion of February 2023, FCC determined that:

“It is recommended that the Planning Authority serve notice on the prospective applicant, pursuant to Section 32D of the Planning and Development Act 2000, as amended, stating that is the opinion that the documentation submitted within the consultation request under Section 32B of the Act constitutes a reasonable basis on which to make an application for permission for the proposed Large-scale Residential Development.

Pursuant to Article 16A(7) of the Planning and Development Regulations 2001, as amended, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 20A, 22 and 23, the following specific information should be submitted with any application for permission”

2.1 National, Regional and Local Policy

Detailed statement of consistency to demonstrate that how the proposal accords with National, Regional and Local Policy including the Fingal Development Plan 2017-2023 and the Baldoyle Stapolin Local Area Plan (heights, density, numbers, phasing, creche provision, protection of view corridors etc.)

A Planning Report & Statement of Consistency has been prepared by Brady Shipman Martin and is included within the application documentation. This report sets out how the proposed development is in accordance with National, Regional and Local Planning Policy, including the Fingal Development Plan 2017-2023, the Adopted Fingal Development Plan 2023-2029 (to come into effect 5th April) and the Baldoyle-Stapolin Local Area Plan 2013 (as extended).

Height, density, numbers, phasing, protection of view corridors is discussed in Section 6.2.2 of the Planning Report & Statement of Consistency in relation to the Baldoyle-Stapolin Local Area Plan 2013 (as extended). Creche provision is discussed in Appendix 1 – ‘Social Infrastructure Audit including Education & Childcare’ of the Planning Report & Statement of Consistency.

2.2 Detailed Design Statement

Detailed design statement to demonstrate how the proposed accords with Objective DMS03 of the Fingal Development Plan 2017-2023.

As the proposed development is in excess of 5 residential units, an Architectural Design Statement has been prepared by Henry J Lyons (HJL) Architects in accordance with the requirements stated in Objective DMS03 of the Fingal Development Plan 2017-2023, (and consequently with Objective DMS05

of the adopted Fingal Development Plan 2023-2029). This Objective DMS03 sets out, inter alia, that a Design Statement should be submitted, that demonstrates *“how the twelve urban design criteria (as per the Urban Design Manual – A Best Practice Guide) have been taken into account when designing schemes in urban areas.”*

The introduction of the Architectural Design Statement (page 5) clearly sets out how the proposed development is in accordance with the principles of Objective DMS03 of the Fingal Development Plan 2017-2023 and with the corresponding DMS05 of the Adopted Fingal Development Plan 2023-2029. Please refer to the Architectural Design Statement for further details.

2.3 Housing Quality Assessment

Housing Quality Assessment – including information regarding the number of units exceeding the minimum floor areas.

The proposed development is an amendment to a permitted SHD development, permitted under ABP Ref. 310418, which would, if permitted, result in an overall reduction of 55 no. units from 882 no. units to 827 no. units.

A Housing Quality Assessment (HQA) has been prepared by HJL Architects that clearly sets out the total number of units, and the units which exceed the minimum floor areas by 10%. The HQA includes for Block A1, D1, D2, D3, and all other residential elements remain as permitted under ABP Ref. 310418.

2.4 Social Infrastructure Audit

Social Infrastructure Audit – including an educational audit which includes for the consideration of childcare and school place demand which will be generated on foot of the proposed development.

Please refer to Appendix 1 – ‘Social Infrastructure Audit including Education & Childcare’ of the Planning Report & Statement of Consistency prepared by Brady Shipman Martin.

The proposed development consists of a reduction in height, façade and building form enhancements resulting in an overall reduction of 55 no. units. The creche facility of c. 539 sq.m, remains as permitted under the permitted SHD development as permitted under ABP Ref. 310418.

As there is a reduction in the overall number of units, the subject application will not generate additional demand for school or childcare places, over and above that of the permitted development. As the overall number of units will reduce, in effect there will be a lesser demand for school and childcare places than previously permitted.

2.5 Environmental Assessments

Environmental assessments as appropriate, Statement on Biodiversity, AA, NIS and updated Environmental Impact Assessment Report, where applicable.

As part of this LRD application documentation the following environmental assessments have been prepared:

- Environmental Impact Assessment Screening Report prepared by Brady Shipman Martin
- Appropriate Assessment Screening and Natura Impact Statement prepared by Altermar Ltd.

The Environmental Impact Assessment (EIA) Screening Report concludes that the proposed development would not be likely to have significant effects on the environment noting that *“there is no real likelihood of significant effects arising as a result of the proposed development; and, therefore, that*

environmental impact assessment and the preparation of an environmental impact assessment report is not required.”

The Appropriate Assessment Screening and Natura Impact Statement prepared by Altemar Ltd. outlines the information required for the competent authority to screen for appropriate assessment and to determine whether or not the proposed development, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites’ conservation objectives, will adversely affect the integrity of the European site.

The Appropriate Assessment Screening and Natura Impact Statement concludes that *“following the implementation of the mitigation measures outlined, the construction and presence of this development would not be deemed to have a significant impact on the integrity of Natura 2000 sites. No significant impacts are likely on Natura 2000 sites, alone in combination with other plans and projects based on the implementation of standard construction phase mitigation measures.”*

2.6 Comparative Assessment

Detailed approved and proposed plans and sections for comparative assessment. Detail on all plans shall be consistent.

Both permitted and proposed drawings prepared by HJL Architects are submitted as part of this LRD application. Please see accompanying drawing register for complete list of drawings.

All other engineering and service elements remain as permitted under the permitted SHD (ABP Ref. 310418) and therefore no engineering drawings are submitted as part of the application documentation. Landscape and Open Space provision also remains as permitted under the permitted SHD (ABP Ref. 310418) and therefore no landscape drawings are provided as part of this application.

2.7 Architectural Drawings

Sufficient plans, contiguous elevations and cross sections to adequately demonstrate the relationship of the proposed development relative to the existing surrounding development.

Architectural drawings have been prepared by HJL Architects which appropriately address the proposed development in the context of surrounding development through plans, elevations and cross sections.

Please refer to permitted and proposed drawings prepared by HJL Architects for further details.

2.8 Separation Distances

Sufficient detail to demonstrate that adequate separation distances would be achieved between opposing windows and balconies. Instances are noted where separation distances are below standard in addition to balconies which have been relocated to the northern western and northern eastern sides of the D Blocks with resulting reduced separation distances. The applicant’s rationale is noted however proposed plans should clearly demonstrate instances for clarity and assessment and provide sufficient compensatory rationale where noncompliance is proposed.

Please refer to Section 04.07 (page 66 & 67) of the Architectural Design Statement prepared by HJL Architects for details on privacy and separation.

Under the permitted SHD development (ABP Ref. 310418) studio apartments on the north and eastern corner of Block D1 and the north and western corner of Block D3 were designed to be dual aspect apartments with north facing balconies.

In the proposed scheme, these balconies are increased in size and are moved to the adjacent facade. These balconies have an improved aspect, i.e. they are no longer north facing and face onto the landscaped courtyard (for Block D1 they now face east and for Block D3 they now face west). Relocating the balconies has both increased size and improved privacy of these balconies.

Please refer to the Architectural Design Statement and Architectural Drawings prepared by HJL Architects for further details.

2.9 Storage Areas

Clarify on floor plans of apartments if the floor area of the bedrooms exclude the storage areas.

Storage is not included in the bedroom area and is clearly annotated on the unit type drawings prepared by HJL Architects.

2.10 Landscape and Visual Assessment Report

Landscape and Visual Assessment Report, including CGIs of the proposed development.

A Comparative Visual Appraisal Summary has been prepared by CSR Landscape Architects which should be read in conjunction with Verified Photomontages prepared by ModelWorks.

The Assessment considers key views from the north, south, east and west of the site against 4 no. separate scenarios: baseline view, permitted views, proposed view and cumulative view.

The Comparative Visual Appraisal Summary concludes that the proposed amendments will contribute to reduce the visual effects and are considered visually appropriate and within context. In addition, Street Vistas and View Corridors (as defined in the Baldoyle-Stapolin LAP) are unaltered relative to the permitted SHD scheme (ABP Ref. 310418).

Please refer to the Comparative Visual Appraisal Summary prepared by CSR Landscape Architects and Verified Photomontages prepared by ModelWorks for further details.

2.11 Daylight and Shadow Analysis

Daylight Sunlight Analysis

A Daylight, Sunlight & Overshadowing Report has been prepared by OCSC and is submitted as part of the LRD application documentation.

The Daylight, Sunlight & Overshadowing Report states *“overall, the results show that the daylight in the blocks proposed to be modified, will be improved following the incorporation of the proposed amendments, as is to be expected considering the reduction in massing proposed.”* The report further notes that *“the impact to surrounding properties is reduced following the incorporation of the proposed changes, as is to be expected considering the reduction in massing proposed.”*

Please refer to the A Daylight, Sunlight & Overshadowing Report prepared by OCSC for further details on the methodology, assessment and results.

2.12 Public Lighting Plan

Public Lighting Plan

A Proposed Site Lighting Layout drawing (Dwg No. R500-OCSC-GA01-ZZ-XX-DR-E-0006) has been prepared by OCSC and submitted as part of the LRD application documentation.

No changes are proposed to the permitted Site Lighting Layout under ABP Ref. 310418

2.13 Taking in Charge Plan

Taking in Charge Plan

As per the permitted SHD (ABP Ref. 310418), the proposed development does not require any of the site to be given over to the Local Authority for Taking in Charge, therefore a Taking in Charge drawing is not included as part of the planning application documentation.

2.14 Bicycle Parking

Bicycle parking shall be provided in accordance with Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, as amended.

Cycle parking is provided as permitted under ABP Ref. 310418 & FCC Reg. Ref. SHD/011/20. The permitted SHD includes a total of 1,542 no. cycle parking spaces within the A Blocks and D Blocks comprising a total of 1,056 no. resident cycle parking spaces (long-term) and 146 no. visitor spaces (short-stay).

Although there is a proposed overall reduction of 55 no. units as a result of the proposed amendments, the quantum of cycle parking will remain as permitted, and there will be a slight uplift in resident cycle parking ratio from 1.8 spaces per unit (as permitted) to 2.0 spaces per unit (as proposed). Visitor short-stay cycle parking will also remain unchanged, however the cycle parking ratio will slightly improve from 1 space per 4.0 units (as permitted) to 1 space per 3.6 units (as proposed).

For further details of bicycle parking please refer to the Engineering Services Statement prepared by CS Consulting.

3 CONCLUSION

The proposed development seeks permission to amend the permitted SHD residential development permitted under ABP Ref. 310418. Full application documentation is provided in response to FCC Opinion and is briefly summarised in this Report.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines, and that the development proposals respond to FCC's LRD Opinion.