

LARGE-SCALE RESIDENTIAL DEVELOPMENT
RESPONSE TO FINGAL COUNTY COUNCIL
OPINION

FOR ALTERATIONS TO PERMITTED SHD
ABP REG. REF. 311016
GA3 LANDS, BALDOYLE, DUBLIN 13

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**Brady Shipman
Martin**

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DATE
MARCH 2023

Baldoyle GA3 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 January 2023, in relation to a Pre-Application Consultation meeting Reg. Ref. LRD00016/S2 held on 5th January 2023, under Section 32B of the 2021 Act.

The proposed development seeks permission to amend permitted Strategic Housing Development (ABP Reg. Ref. 311016) on GA3 lands at Baldoyle, formally known as The Coast, Baldoyle, Dublin 13.

The proposed amendments comprise of modifications to Block G1, G2, G3, G5 and Block E1 and consist of the reduction of height, façade enhancements and building form enhancements. Block G4 and Block E2 also included in the application area, however, will remain as permitted under ABP Reg. Ref 311016 as well as all other elements of the wider GA3 lands.

2 RESPONSE TO FINGAL COUNTY COUNCIL

In its Opinion of January 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 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 accordance with 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. 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 4) clearly sets out how the proposed development is accordance with the principles of Objective DMS03, 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 SHD development permitted under ABP Reg. Ref. 311016 which will result in an overall reduction of 97 no. units from 1,221 no. units to 1,124 no. units on the GA3 lands.

A Housing Quality Assessment (HQA) has been prepared by HJL Architects and clearly sets out the total number of units exceed the minimum floor areas by 10%. The HQA includes for Block E1, G1, G2, G3, and G5 only as all other blocks and residential elements remain as permitted under (ABP Reg. Ref. 311016).

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 reduction of height, façade and building form enhancements resulting in an overall reduction of 97 no. units. The creche facility provided in Block G4 with a total area of c. 452 sq.m remains as permitted under the SHD (ABP Reg. Ref. 311016).

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

2.5 Environmental Assessments

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

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 Altamar Ltd.
- Flood Risk Assessment prepared by JBA Consulting.

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 Altamar 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.”*

The Flood Risk Assessment undertaken in accordance with ‘The Planning System and Flood Risk Management’ Guidelines, concludes that the proposed amendments subject of this LRD application do not change the findings of the Flood Risk Assessment report submitted as part of the permitted SHD (ABP Reg. Ref.311016). The assessment is in agreement with the core principles contained within the Planning Guidelines.

2.6 Comparative Assessment

Detailed approved and proposed plans and sections for comparative assessment. Detail on all plans shall be consistent. This shall include any relevant engineering drawings.

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 SHD (ABP Reg. Ref. TA0F.311016) and therefore no engineering drawings are submitted as part of the application documentation.

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 Floor Plans

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.

2.9 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 to GA3 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 GA3 scheme.

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

2.10 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 on 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.

2.11 Public Lighting Plan

Public Lighting Plan

A Proposed Site Lighting Layout drawing (Dwg No. R500-OCSC-GA03-ZZ-XX-DR-E-0100) 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 Reg. Ref. 311016.

2.12 Taking in Charge Plan

Taking in Charge Plan

A Taking in Charge Plan (dwg no. 21771-CSR-00-XX-DR-0190) has been prepared by CSR Landscape Architects and is submitted as part of this LRD application. The same areas are intended for Taking in Charge as per the permitted SHD development referenced below. All areas outside of the subject application will remain for taking in charge as per the permitted SHD development (ABP Reg. Ref.311016).

3 CONCLUSION

The proposed development seeks permission to amend the GA3 SHD permitted under ABP Reg. Ref. TA06F.311016. 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 polices and guidelines, and that the development proposals respond to FCC's LRD Opinion.