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**Built.
Environment.**

Project: Lands at Baldoyle / Stapolin (referred to as The Coast), Dublin 13
Alteration of development previously permitted under ABP Reg. Ref. ABP-310418-21 (and as amended under LRD/0016/S3 & LRD/0073/S3E)

Applicant: The Land Development Agency

Subject: Screening for Environmental Impact Assessment

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1.0 Introduction and Proposed Development

The Land Development Agency (LDA) is currently progressing the delivery of residential development at the subject site, pursuant to planning permission granted under ABP Reg. Ref. ABP-310418-21 (and as amended under LRD/0016/S3 & LRD/0073/S3E).

The proposed development, the subject of this application, will consist of alterations relating solely to permitted Block A, Block D and Stapolin Square and therefore relates to approx. 3.3 hectares (ha) of the wider c.9.1ha development permitted under ABP Reg. Ref. ABP-310418-21. No amendments are proposed to any other permitted blocks.

Permitted Block A and Block D are located to the south and north of Stapolin Square and include for 528 no. units (277no. in Block A1, A2 & A3 and 251no. in Block D1, D2 & D3) and include residential tenant amenity, retail/café/restaurant, pharmacy, medical centre, crèche, gym, car and bicycle parking and public realm.

As noted, the proposed alterations only apply to Block A, Block D and Stapolin Square of the permitted development and for the most part are contained within the footprint and massing of the permitted development and relate to internal reconfiguration. The proposed alterations result in an overall increase of 68 no. units in Block A and Block D, bringing the total units in Block A and Block D to 596no. and the total overall permitted development to 893 no. units (760no. apartments and 133no. houses).

The location of the site of the proposed alterations is indicated on **Figure 1**. The as permitted site layout within the wider context is provided on **Figure 2**, while the as permitted and as proposed site layout for area of the amendments are shown on **Figure 3** and **Figure 4**.

2.0 The Proposed Development

The development as currently proposed comprises only minor modifications to the previously permitted development, as follows:

The proposed development will consist of the alteration of permitted development, as permitted under ABP Reg. Ref. ABP-310418-21 (and as amended under LRD/0015/S3 & LRD/0073/S3E), and relating solely to the permitted Block A, Block D and Stapolin Square. No amendments are proposed to any other permitted blocks. The permitted Block A and Block D are located to the south and north of Stapolin Square and include for 528 units (277 in Block A1, A2 & A3 and 251 in Block D1, D2 & D3)

and include residential tenant amenity, retail/café/restaurant, pharmacy, medical centre, crèche, gym, car and bicycle parking and public realm. The proposed alterations only apply to Block A, Block D and Stapolin Square of the permitted development and for the most part are contained within the footprint and massing of the permitted development and relate to internal reconfiguration.

The proposed alterations result in an overall increase of 68 no. units in Block A and Block D, bringing the total units in Block A and Block D to 596, the total units permitted under ABP Reg. Ref. ABP-310418-21 (as amended) to 893 (760 apartments and 133 houses).

The proposed altered residential development of Block A and Block D will consist of a total of 596 no residential apartments, which includes 305 No. 1-Bed, 46 No. 2-Bed- 3-Person, 235 No. 2-Bed- 4-Person and 10 No. 3-Bed- 5-Person as follows:

- 1. Alteration of Blocks A1, A2 & A3 from permitted 4 to 7-storey buildings providing for 288 no. apartment units to a 4 to 7 storey building providing for 312 no. apartments (158 No. 1-Bed, 15 No. 2-Bed-3-Person & 139 No. 2-Bed- 4-Person).*
- 2. Alteration of Blocks D1, D2 & D3 from permitted 5 to 10-storey buildings providing for 251 no. apartment units to a 5 to 10 storey building providing for 284 no apartments (147 No. 1-Bed, 31 No. 2-Bed-3-Person, 96 No. 2-Bed- 4-Person, 10 No. 3-Bed- 5-Person).*
- 3. The reconfiguration of internal layouts of each of the blocks has resulted in the reduction of the blocks overall width and therefore increased width and area to the courtyards and increased distance between individual blocks. A resulting increase in external communal amenity space, at podium level of c.5,740.4 sq.m from c.6,337 sq.m is provided. Removal of permitted roof terrace on Block D3 at level 10.*
- 4. Façade modifications are proposed to respond to the revised internal layouts including minor relocation of windows, balconies etc. The overall parapet heights have also been reduced across the scheme as a result of the reduction of Level 1 floor to floor height by 400mm.*
- 5. Alteration of the permitted uses and facade at ground floor level and removal of permitted Residential Tenant Amenity Facilities located in Blocks A3 and D3 to provide for a ground floor level that includes in Blocks A1-A3, 4 no. retail/restaurant/café/pharmacy/medical centre/gym units totalling 986 sq.m and a crèche of c.702 sq.m including outdoor play space of c.155 sq.m and in Blocks D1-D3, 4 no. retail/restaurant/cafe units totalling and 8 no. residential units.*
- 6. A revised central civic plaza at Stapolin Square centrally located between Blocks A1-A3 and D1-D3, redesigned to address Condition 2 (a) of ABP-310418-21 which requires the removal of the two previously proposed public lifts. Stapolin Square is now designed to accommodate a gently sloped landscaped route from Longfield Road to Clongriffin Train Station.*
- 7. Alterations to the permitted below podium areas under Block A, Stapolin Square & Block D to include for alterations to permitted layouts of car parking, cycle parking, plant, waste stores and substation locations. This includes the reduction in car parking as required under Condition 2 (b) of ABP-310418-21 which requires omission of car parking under the permitted ramped access road to the Train Station to the north of Block D. The reconfiguration of the below podium area results in proposed car parking of 368 no. spaces (326 below podium and 42 at surface level), 1,631 no. cycle parking spaces (all located in secure stores or at surface level) and the removal of the permitted gym below the permitted ramp. Commercial and visitor car and cycle parking is provided at ground level around the scheme.*
- 8. Alteration of the permitted extent of PV panels at roof level of Blocks A1-A3 and D1-D3.*

No amendments are proposed to the constructed Blocks within B3, B4, C4, C5, C6 or the permitted The Haggard Park which remains as permitted, or all other elements including surface water attenuation wetlands and associated upstream surface water network, demolition of existing temporary lift and stair enclosure and associated infrastructure to Clongriffin Train Station, road infrastructure (except where within the application boundary and requiring to be locally altered for proposed alterations), and utilities infrastructure (except where within the application boundary and requiring to be locally altered for proposed alterations), all of which remain as per permitted. A Natura Impact Statement has been prepared in respect of the proposed development.

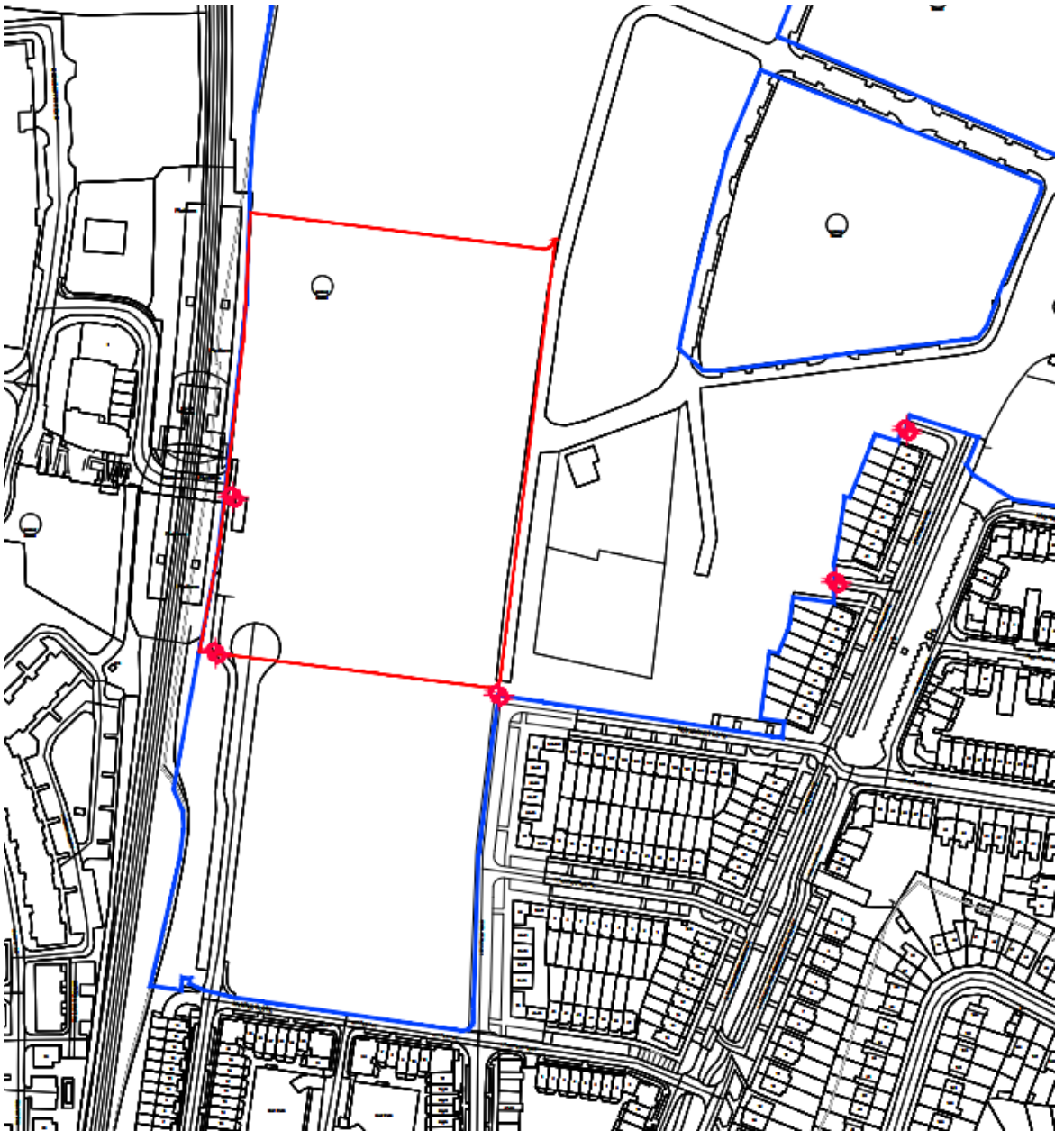


Figure 1: Location of Proposed Alterations Application Site (outlined in Red) adjacent to Clongriffin Train Station



Figure 2: The As Permitted Site Layout for the Wider Site Area

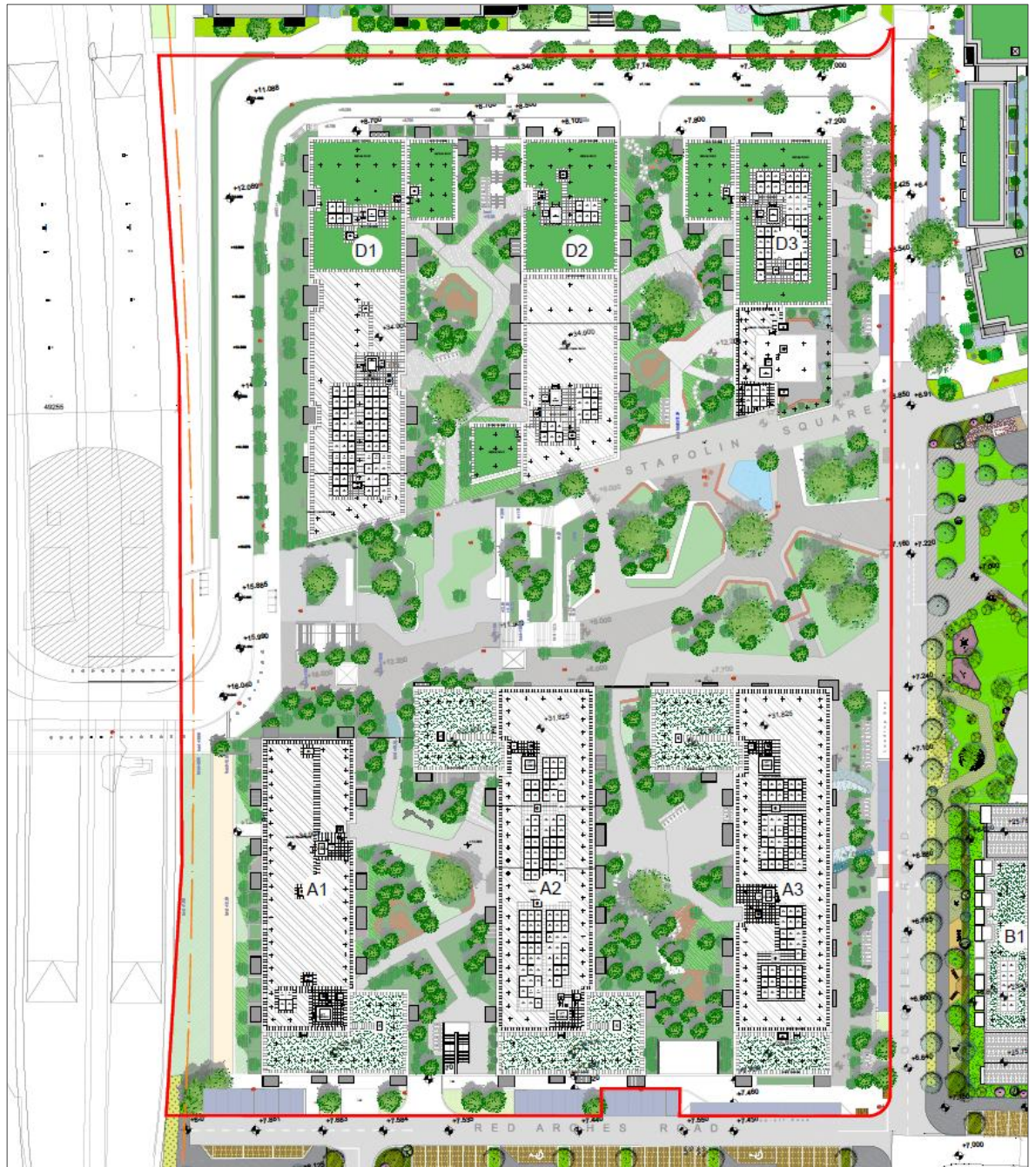


Figure 3: The As Permitted Site Layout for the Area of the Proposed Amendments



Figure 4: The As Proposed Site Layout for the Area of the Proposed Amendments

3.0 Consideration of the requirement for Environmental Impact Assessment (EIA)

3.1 Introduction and Background to EIA for the Proposed Development

Prescribed classes of development and thresholds of development that trigger mandatory Environmental Impact Assessment (EIA) are set out in Schedule 5 of the Planning and Development Regulations 2001, as amended (PDR 2001).

The parent permission (ABP-310418-21 / FCC Reg. Ref.: AHD/011/20) is for development comprising a total of 882 no. residential units. That application for permission was subject to EIA as the proposed development exceeded the 500 residential unit threshold at or above which EIA is required as set out under Class 10(b)(i) in Part 2 of Schedule 5 of the PDR 2001.

The parent permission was subsequently amended (by LRD0015/S3) and a report (*Screening for the Requirement for Environmental Impact Assessment*) was submitted with that application. That permission reduced the overall number of residential dwellings, as a result of an overall reduction in height, by 55 no. residential units to a total of 825.

Consideration of the requirement for EIA for the above amendment application (Section 4.11 of the FCC Planner's Report) notes that as *"the proposed amendments (proposed development) involves changes to an existing permitted development, the proposed development can be considered for an EIA under project type 13 Changes, Extension, development and Testing as set out in Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended. As there is no change in the development footprint and a reduction in the unit numbers the proposed project does not meet or exceed the thresholds set down [...] and therefore an EIA is not required under this provision."*

The Planner's Report concludes, that: *"The Planning Authority would concur with the findings of the assessment 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 assessment report would not be required."*

3.2 Screening for EIA

The proposed development, comprising minor amendments to the permitted development, is not of a class of development as listed in Part 1 of Schedule 5 of PDR 2001 and therefore, an EIA is not required under this provision.

While the project relates to residential development, the key objective of the proposed alterations is to adjust the layouts of the permitted apartments to optimise the unit ratio mix to deliver a further 68 no. units within the same development footprint on a 3.1ha area of the overall 9.1ha. previously permitted development site. There is no increase in the footprint area of 'urban development' and no 'demolition' works are proposed.

It is noted that while this amendment increases the number of residential units by 68 no., the previous amendment (FCC Reg. ref.: LRD0015/S3) reduced the number by 55no. residential units. As such this proposed amendment only increases the number of residential units permitted in the parent permission (ABP-310418-21 / FCC Reg. Ref.: AHD/011/20) by 13 units and overall by 11 units overall as a result of a further amendment under LRD/0073/S3E to the B Blocks.

Notwithstanding the above, given the small increase in residential units (68 no.), when considered against the overall permitted under ABP-310418-21 / FCC Reg. Ref.: AHD/011/20, which was subject

to an EIAR, and no change in the development footprint, EIA is not required for the proposed development under the normal provisions for new residential development as set out under class 10(b)(i) (*more than 500 units*) or (iv) (*urban development which would involve an area greater than 10 hectares*) of Part 2 of Schedule 5.

However, the proposed amendments (proposed development) do involve changes to an existing permitted development, and therefore, the proposed development can be considered for an EIA under development type “13. *Changes, extensions, development and testing*”, and specifically under:

- “(a) Any change or extension of development already authorised, executed or in the process of being executed (not being a change or extension referred to in Part 1) which would:-
- (i) result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, and
 - (ii) result in an increase in size greater than –
 - 25 per cent, or
 - an amount equal to 50 per cent of the appropriate threshold,
 whichever is the greater”

Given that there is no change in development footprint and there is only a small increase in the numbers of residential units (i.e. 68no. units), the project does not meet or exceed the thresholds set down above or as set out in [Table 3.1](#) below, and therefore an EIA is not required under this provision.

Table 3.1: Consideration for an EIA under Part 2 of Schedule 5

Project Class	Stated (Appropriate) Threshold	Actual Proposed (relative to threshold)	Is an EIA required?
10(b)(i)	Construction of more than 500 new units.	The proposed amendment provides for small increase of 68 no. residential units.	Does not meet or exceed the threshold of 500 new units. EIA is not required under this provision.
10(b)(v)	More than 10 hectares of urban development area.	Proposed amendment relates to previously permitted development on only c.3.3 hectares of the 9.1ha. of permitted development. There is no change in area of development footprint.	Does not meet or exceed threshold of 10 hectares of new urban development. EIA is not required under this provision.
13(a)(i) & (ii)	Being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule,	The proposed amendment provides for a small increase of 68 no. residential units.	Does not meet or exceed either the 25% or 50% thresholds for increase in size – which would entail

Project Class	Stated (Appropriate) Threshold	Actual Proposed (relative to threshold)	Is an EIA required?
	<u>and</u> result in an increase in size greater than – - 25 per cent, or - an amount equal to 50 per cent of the appropriate threshold, <u>whichever is the greater</u>		an increase of 250no. units (50% of 500 – being the greater). EIA is not required under this provision.
14	Works of Demolition	Works of demolition carried out in order to facilitate a project listed in Part 1 or Part 2 of this Schedule where such works would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7	No demolition works are included in the proposed amendment.

Therefore, and as with the consideration of the requirement for EIA for the previous amendment (refer to Sub-section 3.1 of this report), it is considered that the proposal would not trigger another mandatory EIAR, nor would it give rise to a sub-threshold environmental impact assessment. The development would not give rise to any effects which would differ from the parent planning permission, as previously amended, and it will be carried out in accordance with the conditions of the previous permissions and of normal building practices in order to mitigate against any adverse impacts.

3.3 Provision of Information as Required of Schedule 7A of the PDR 2001

While it is considered that there is no requirement for EIA or for Screening for EIA, the information as required of the applicant (*i.e.* Schedule 7A of PDR 2001) for the purposes of assisting the competent authority in making such a determination (having regard to the criteria in Schedule 7 of PDR 2001) is provided in the following.

Schedule 7A of the PDR 2001 sets out the information to be provided by the applicant for the purposes of screening sub-threshold development for an EIA (refer to Appendix 1).

Schedule 7 of the PDR 2001 sets out the criteria for determining (by the competent authority) whether development listed in Part 2 of Schedule 5 should be subject to an EIA.

The response to the information to be provided as set out in Schedule 7A of the PDR 2001 is detailed in [Table 3.2](#) below.

Table 3.2: Provision of Information as required from Schedule 7A of PDR 2001

1. A description of the proposed development, including in particular—

(a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works

The proposed development will consist of the alteration of permitted development of Block A, Block D and Stapolin Square, as permitted under ABP Reg. Ref. ABP-310418-21 (and as amended under LRD/0015/S3 & LRD/0073/S3E). No amendments are proposed to any other permitted blocks. The permitted Block A and Block D are located to the south and north of Stapolin Square and include for 528 units (277 in Block A1, A2 & A3 and 251 in Block D1, D2 & D3) and include residential tenant amenity, retail/café/restaurant, pharmacy, medical centre, crèche, gym, car and bicycle parking and public realm. The proposed alterations only relate to Block A, Block D and Stapolin Square, of the permitted development and for the most part are contained within the footprint and massing of the permitted development and relate to internal reconfiguration.

The proposed alterations result in an overall increase of 68 no. units in Block A and Block D, bringing the total units in Block A and Block D to 596, the total units permitted under ABP Reg. Ref. ABP-310418-21 (as amended) to 893 (760 apartments and 133 houses).

The proposed altered residential development of Block A and Block D will consist of a total of 596 no residential apartments, as follows:

1. Alteration of Blocks A1, A2 & A3 from permitted 4 to 7-storey buildings providing for 288 no. apartment units to a 4 to 7 storey building providing for 312 no. apartments.
2. Alteration of Blocks D1, D2 & D3 from permitted 5 to 10-storey buildings providing for 251 no. apartment units to a 5 to 10 storey building providing for 284 no apartments.
3. The reconfiguration of internal layouts of each of the blocks has resulted in the reduction of the blocks overall width and therefore increased width and area to the courtyards and increased distance between individual blocks.
4. Alteration of the permitted uses and facade at ground floor level and removal of permitted Residential Tenant Amenity Facilities located in Blocks A3 and D3 to provide for a ground floor level that includes in Blocks A1-A3, retail/restaurant/café/gym units and a creche including outdoor play space and in Blocks D1-D3, retail/restaurant/cafe units and residential units.
5. A revised central civic plaza at Stapolin Square centrally located between blocks A1-A3 and D1-D3, redesigned to address Condition 2 (a) of ABP-310418-21 which requires the removal of the two previously proposed public lifts. Stapolin Square is now designed to accommodate a gently sloped landscaped route from Longfield Road to Clongriffin Train Station.
6. Alterations to the permitted below podium areas under Block A, Stapolin Square & Block D to include for alterations to permitted layouts of car parking, cycle parking, plant, waste stores and substation locations. This includes the reduction in car parking as required under Condition 2 (b) of ABP-310418-21 which requires omission of car parking under the permitted ramped access road to the Train Station to the north of Block D. An increase in bicycle parking is proposed.

No amendments are proposed to the constructed Blocks within B3, B4, C4, C5, C6 or the permitted The Haggard Park which remains as permitted, or all other elements including surface water attenuation wetlands and associated upstream surface water network, demolition of existing temporary lift and stair enclosure and associated infrastructure to Clongriffin Train Station, road infrastructure (except where within the application boundary and requiring to be locally altered

for proposed alterations), and utilities infrastructure (except where within the application boundary and requiring to be locally altered for proposed alterations), all of which remain as per permitted.

No demolition works are required for the proposed amendments.

(b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected

The subject site is approx. 3.3 ha, which forms a part of the wider c. 9.1 ha permitted GA1 SHD development, (ABP Reg. Ref. 310418). The site is bound to the north and east by lands referred to as Growth Area 3 (GA03) in the Baldoyle-Stapolin Local Area Plan 2013 (now expired) which are subject of a permitted SHD development (ABP Ref. 311016), to the east and south by the subject permitted lands, and to the west by the Dublin-Belfast railway line.

The subject site is located in Baldoyle, Dublin 13, approximately 10km northeast of the city centre. While the site is on the edge of the urban extent of Dublin City, it is within the administrative area of Fingal County Council (FCC) adjacent to the Dublin City Council administrative boundary at Clongriffin to the west.

Surrounding uses to the west, south and east are predominately residential in nature. Further to the north and northeast is an area designated as 'high amenity' comprising partially of agricultural fields and areas associated with the Baldoyle Estuary. It is intended that FCC will deliver 'Baldoyle Racecourse' Regional Park as part of Development Plan and Local Area Plan objectives at this location.

2. A description of the aspects of the environment likely to be significantly affected by the proposed development.

The proposed amendments relate to a previously permitted development and does not change the nature of the permitted development or the area of the site or the development footprint. The proposed amendments will result in a small increase of 68no. residential units in Block A and Block D and giving an overall development of 893 units.

The proposed amendments will not give rise to any change of any aspects of the environment or to likely significant effects.

3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—

(a) the expected residues and emissions and the production of waste, where relevant

The proposed amendments relate to a previously permitted development and does not change the nature of the permitted development or the area of the site or the development footprint. The proposed amendments will result in a small increase of 68no. residential units in Block A and Block D and giving an overall development of 893 units.

The proposed amendments will not give rise to any change in expected residues or in the production of waste.

(b) the use of natural resources, in particular soil, land, water and biodiversity

The proposed amendments relate to a previously permitted development and does not change the nature of the permitted development or the area of the site or the development footprint.

The proposed amendments will result in a small increase of 68no. residential units in Block A and Block D and giving an overall development of 893 units.

The proposed amendments will not give rise to any appreciable change in the use of natural resources, including soil, land, water or biodiversity.

4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7

The information provided above has taken account of the criteria in Schedule 7.

Conclusion

It is considered that the proposed development, comprising only minor amendments to permitted development would not be likely to have significant effects on the environment. The main reasons for this conclusion are as follows:

- The nature of the proposed development, involving alterations to existing permitted residential development within the same development footprint;
- No demolition works are proposed;
- The proposed development is consistent with the on-going emerging nature the surrounding area;
- No unusual aspects are associated with the proposed development; and
- The proposed development will not give rise to any significant environmental effects.

Therefore, it is recommended that, having regard to the information set out above, the Competent Authority may reach a screening determination 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.*